



U.S. DEPARTMENT OF THE INTERIOR
**BUREAU OF LAND
MANAGEMENT**

U.S. DEPARTMENT OF AGRICULTURE
FOREST SERVICE

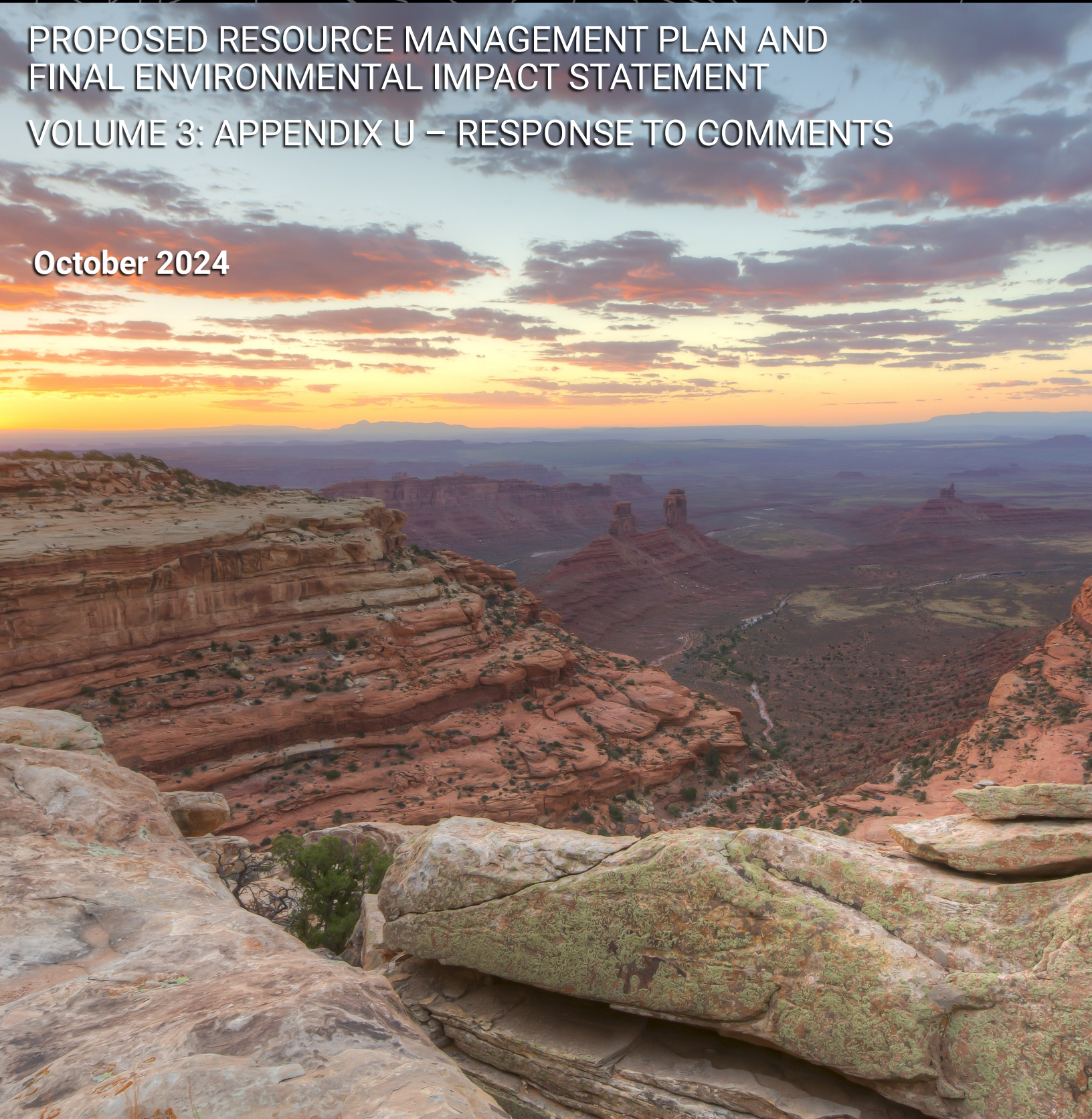


Bears Ears National Monument

San Juan County, Utah

**PROPOSED RESOURCE MANAGEMENT PLAN AND
FINAL ENVIRONMENTAL IMPACT STATEMENT
VOLUME 3: APPENDIX U – RESPONSE TO COMMENTS**

October 2024



U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

BLM Mission

The BLM's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.

U.S. DEPARTMENT OF AGRICULTURE

FOREST SERVICE

USDA Forest Service Mission

The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations.

APPENDIX U

Response to Public Comments

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1 INTRODUCTION

The Bureau of Land Management (BLM) and U.S. Forest Service (USDA Forest Service) (collectively, “the agencies”) published the notice of availability of the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) (Draft RMP/EIS) for Bears Ears National Monument (BENM) on March 13, 2024. The publication of the notice of availability began a 90-day public comment period that ended on June 11, 2024.

Comments on the Draft RMP/EIS were accepted by the BLM and USDA Forest Service during the 90-day public comment period through the ePlanning website, by U.S. Postal Service mail, or by hard copy at BLM and USDA Forest Service offices. Additionally, the BLM and USDA Forest Service hosted five in-person, open house-style public meetings to provide the public with an opportunity to hear a presentation about the RMP/EIS and the planning process, speak with representatives of the BLM and USDA Forest Service, ask questions, and submit comments on the Draft RMP/EIS in writing or verbally through a court reporter present at these meetings. The in-person meetings were held on April 18, 2024, in Salt Lake City, Utah; on April 23, 2024, in Blanding, Utah; on May 6, 2024, in Twin Arrows, Arizona; on Tuesday, May 7, 2024, in Albuquerque, New Mexico; and on May 16, 2024 in Monument Valley, Utah. In addition, two public meetings were held virtually on April 16 and May 2, 2024 to provide the public an opportunity to hear a presentation about the RMP/EIS and the planning process and to submit questions for the BLM and USDA Forest Service to answer. All comments were given equal consideration, regardless of method of submittal.

The BLM and USDA Forest Service are required to assess and consider comments on the Draft RMP/EIS both individually and collectively (40 Code of Federal Regulations [CFR] 1503.4(a)). This appendix summarizes the comments received during the 90-day public comment period and how the BLM and USDA Forest Service addressed these comments in the development of the Proposed RMP/Final EIS.

Consistent with 40 CFR 1503.4(b), this appendix focuses on substantive comments on the Draft RMP/EIS. A high volume of non-substantive comments was also received by the agencies. In general, these non-substantive comments indicate other topics that are of interest to the public that are not directly related to the RMP/EIS or the planning process. The BLM National Environmental Policy Act (NEPA) Handbook defines substantive and non-substantive comments as indicated below.

Substantive comments do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS or environmental assessment
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis
- Present new information relevant to the analysis
- Present reasonable alternatives other than those analyzed in the EIS or environmental assessment
- Cause changes or revisions in one or more of the alternatives

Comments that are not considered substantive include the following:

- Comments in favor of or against the proposed action or alternatives without reasoning that meets the criteria listed above (such as “we disagree with Alternative Two and believe the BLM should select Alternative Three”)

- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above (such as “more grazing should be permitted”)
- Comments that do not pertain to the project area or the project (such as “the government should eliminate all dams,” when the project is about a grazing permit)
- Comments that take the form of vague, open-ended questions

In response to substantive comments, in accordance with 40 CFR 1503.4(a), the agencies could do the following:

- Modify alternatives, including the proposed action
- Develop and evaluate alternatives not previously given detailed consideration by the agencies
- Supplement, improve, or modify their analyses
- Make factual corrections
- Explain why the comments do not warrant further agency response, citing appropriate sources or authorities

Comments that merely express an opinion for or against an alternative or the development of the RMP/EIS were generally not identified as requiring a response because they meet the BLM NEPA Handbook definition for a non-substantive comment.

1.1 Submission Processing and Comment Coding

The following sections describe the methods used to review and identify comments received during the 90-day public comment period.

1.2 Submission-Level Processing

The agencies received 18,217 submissions from the public during the 90-day public comment period. Duplicate submissions from the same sender made through more than one submission method were excluded from this total. Each submission received was entered into a database, assigned a unique submission number, and reviewed individually for substantive comments.

Submissions were categorized based on the content of the submission as unique; form letter (submissions that were identified as identical letters submitted by individuals as part of an organized letter writing campaign with no unique text); and form letter plus (submissions that were identified as part of an organized letter writing campaign that also contained unique text added to, embedded in, or altered from the form letter text).

All comments were given equal consideration, regardless of method of submittal. Of the 18,217 submissions, 1,543 were unique, and 16,674 were part of organized letter writing campaigns, as presented in Table U-1.

Table U-1. Submittal Summary by Type

Format	Number of Submissions
Unique	1,543

Format	Number of Submissions
Form letter	15,625
Form letter plus	1,049
Total	18,217

Each individual submission was also categorized based on the affiliation of the sender as submitted by individuals, organizational groups (e.g., environmental organizations, user group organizations), Tribes, and government agencies (including federal, state, and local governments). Table U-2 presents the number of submissions sent by the individual's self-identified affiliation. There are fewer senders than number of submissions because a number of individuals submitted more than one submittal.

Table U-2. Sender by Type

Format	Number of Submissions
Individuals	16,388
Organizational Senders	120
Government Agencies	9
Tribal Entities	1
No Association Listed	20
Total	16,538

1.3 Comment-Level Coding

After the 18,217 submissions received during the public comment period were entered into a database and assigned a unique submission number, the content of the submissions was reviewed. Based on this review, individual substantive comments were identified. Each individual substantive comment was assigned a unique comment number based on the submission number and the number of comments identified in the submission. Each unique comment was also assigned a topic-based code, or multiple topic-based codes, according to the issue raised in the comment. For example, if a submission numbered 100 brought up four different issues, the submission text was parsed into four separate comments numbered 100-1, 100-2, 100-3, and 100-4, and each comment was assigned a code based on the topic of the unique comment. This parsing process resulted in approximately 2,700 individual comments, which were then coded according to the issues raised. Comments relevant to more than one issue were given secondary codes to ensure that they were captured under each issue. Comments were received on topics related to the planning process, public and stakeholder involvement, and almost every resource or resource use. Tables U-3 through U-33 present the comments sorted by topic. Comments that received secondary code(s) are sorted into their topic table by the primary code.

2 COMMENTS AND RESPONSES BY RESOURCE OR PLANNING TOPIC

The following sections list the individual substantive comments received during the 90-day public comment period and the agencies' responses to those comments. All comments received have been incorporated into the project record and can be accessed by contacting the BLM Monticello Field Office.

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Table U-3. ACECs

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
16940-6	Christopher Lish 1004 Los Gamos Road Apt. D San Rafael, 94903		Designate all the Areas of Critical Environmental Concern (ACEC) proposed in Alternative E, especially the large Aquifer Protection ACEC. Protecting healthy landscapes in these ACECs is more effective than attempting to restore degraded ones.	ACEC01-General	All ACECs listed in Alternative E, with the exception of John's Canyon ACEC, would be designated under the Proposed Plan.
17969-13	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Special Designations TNC supports the designation of Lavender Mesa as an Area of Critical Environmental Concern in the Proposed RMP/Final EIS because of its ecologically important vegetation community that has little to no impact from wildlife, livestock, or people.	ACEC01-General	All ACECs listed in Alternative E, with the exception of John's Canyon ACEC, would be designated under the Proposed Plan.
1826-10	George and Frances Alderson 112 Hilton Ave. Catonsville, MD 21228		ACECs: We support the designation of Areas of Critical Environmental Concern as proposed by BLM, to fulfill the mandate in FLPMA Sec. 202(c). In particular we support the Aquifer Protection ACEC of up to a million acres.	ACEC01-General	All ACECs listed in Alternative E, with the exception of John's Canyon ACEC, would be designated under the Proposed Plan.
8992-7	Olivia Juarez 1919 14th St, Suite 700 Boulder, CO 80302	GreenLatinos	GreenLatinos supports Alternative E for the special designation of the San Juan River as an ACEC, which helps conserve the critical ecosystem services provided by the river. We also support the designation of the Aquifer Protection ACEC to honor and protect the most precious resource and relative at the monument: water. It is imperative that hydrologic studies for all proposed groundwater withdrawals are required and that hazardous material storage is prohibited to protect water health. We encourage the management of the Aquifer Protection ACEC to include a long term hydrologic study of the aquifer in general to track aquifer level changes over time as a result of climate change, or as a result of vegetation management which may help or hinder aquifer recharge.	ACEC01-General	Under the Proposed Plan, the San Juan River ACEC and Aquifer Protection ACEC would be designated. See the Special Designations Section in Chapter 2 for special management associated with the Aquifer Protection ACEC, including prioritizing the completion of a hydrologic study for the ACEC.
17963-5	Sierra Nelson		Wilderness & Special Designations The UWGA opposes the large areas proposed as Areas of Critical Environmental Concern (ACECs) and Lands with Wilderness Characteristics (LWCs). These designations restrict land management and should be minimal, allowing continued grazing and aligning with local management plans.	ACEC01-General, ALT05-Alternative E	See the Proposed Plan in the Special Designation Section in Chapter 2 and Lands with Wilderness Characteristics in Chapter 2 . Grazing is generally not prohibited in BLM WSAs, LWC, or ACECs, but new grazing-related developments and actions may not be allowed if they do not meet the management prescriptions for those areas. Lavender Mesa ACEC is designated as unavailable to grazing, but that is because it is topographically isolated by sheer cliffs, Lavender Mesa is inaccessible to both man and livestock by ground routes. In fact, it is even small mammals such as rabbits and mice, which appear to be absent according to the BLM inventory (BLM, 2023d).
18556-10	Stan		9. The preferred alternative (E) zones of Front Country, Outback, Passage, and Remote frustrate the ACEC process, essentially making the entire monument one huge ACEC.	ACEC01-General, ALT05-Alternative E	All ACECs listed in Alternative E, with the exception of John's Canyon ACEC, would be designated under the Proposed Plan. Because BENM was designated as a national monument pursuant to the authority of the Antiquities Act, the BLM and USDA Forest Service must manage the Monument in a manner that ensures the proper care and management of the objects identified in Proclamation 10285. Further, the agencies have made adjustments to the management zone boundaries in the Recreation and Visitor Services section of the Proposed Plan.
18668-2	Vanessa Soncco		Give ACEC decision making authority to the Bears Ears Commission and Tribal Leaders alongside federal agencies as they must have an option to protect water as a sacred and cultural resource.	ACEC01-General, ALT05-Alternative E	In recognition of the importance of Tribal knowledge about the lands and objects within the boundaries defined by Proclamation 10285, and to ensure that management decisions affecting the Monument reflect the expertise and traditional and historical knowledge of interested Tribal Nations and people, the BLM and USDA Forest Service will continue to meaningfully engage with the BEC regarding the development of the management plan and to inform management of BENM as required in Proclamations 9558 and 10285. However, the BLM and USDA Forest Service retain decision-making authority over management decisions for federal lands within the Monument.
9061-6			Allow the Tribes to designate Areas of Critical Environmental Concern especially with regards to protecting water resources and un-damaged landscapes in Bears National Monument.	ACEC01-General, ALT05-Alternative E, CUL03-Tribal Concerns	In recognition of the importance of Tribal knowledge about the lands and objects within the boundaries defined by Proclamation 10285, and to ensure that management decisions affecting the Monument reflect the expertise and traditional and historical knowledge of interested Tribal Nations and people, the BLM and USDA Forest Service will continue to meaningfully engage with the BEC regarding the development of the management plan and to inform management of BENM as required in Proclamations 9558 and 10285. However, the BLM and USDA Forest Service retain decision-making authority over management decisions for federal lands within the Monument.
3125-10	Steve Knox		Page 2-42, Special Designations, Table 2-9, 1st 2020 ROD/MMP action, Alternatives B, C, D, and E These alternatives refer to management of WSAs as See Management Actions Common to All Action Alternatives, but Section 2.4.10.2 doesnt address BLM WSA management, just Forest Service Wilderness and IRAs. Please clarify Page 2-42, Special Designations, Table 2-9, 1st 2020 ROD/MMP action, Alternatives B, C, D, and E Same comment as comment 23 above for Bridger Jack Mesa WSA. Do you mean Section 2.4.10.1 Goals and Objectives? That section does address WSA management. Page 2-43, Special Designations, Table 2-9, 1st 2020 ROD/MMP action, Alternatives B, C, D, and E Same comment as comment 23 above for Mule Canyon WSA. Page 2-44, Special Designations, Table 2-9, 2nd 2008 Monticello RMP action, Alternatives B, C, D, and E Management Action Common to All Action Alternatives doesnt address this action/prescription. Do you mean to See the Goals and Objectives section?	ACEC01-General, ALT07-Modification of Existing Alternatives	WSA management was moved to be consistent with the Alternatives for Special Designations Table.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-24	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	43 CFR 1610.72 requires that the BLM: Designation of areas of critical environmental concern. Areas having potential for Areas of Critical Environmental Concern (ACEC) designation and protection management shall be identified and considered throughout the resource management planning process (see 1610.41 through 1610.49). FLPMA itself provides the direction for ACEC designation when the statutes stated: (3) give priority to the designation and protection of areas of critical environmental concern; (FLPMA Section 202) The EIS and DRMP failed to comply with these requirements.	ACEC01-General, DECI07-Compliance with other laws and policies	The RMP/EIS includes consideration of the requirements of these guidelines, including prioritizing consideration of proposed ACECs, using an AMS to guide development of a range of reasonable alternatives—including an analysis of all ACECs that meet the criteria in the BLM's ACEC Manual 1613—providing a framework to guide subsequent implementation decisions, and using this land use planning process to coordinate with the public to develop management to protect resources.
11-4	Eric Johnson Amphibian Refuge, 11225 Morocco Road NE Albuquerque, NM 87111	Amphibian Refuge	The San Juan River ACEC should also be studied for its potential to protect amphibians.	ACEC02-Existing ACECs, ALTO7-Modification of Existing Alternatives	The BLM reviewed the relevant and important values in both existing and proposed ACECs and determined a range of geographic designation locations and special management actions under the range of alternatives to fulfill the requirement to protect those relative and important values. For the San Juan River ACEC, Fish and Wildlife resources were found to meet relevant and important values. The San Juan River has a unique endemic fish population and designated critical habitat for the endangered Colorado pikeminnow (<i>Ptychocheilus lucius</i>) and the razorback sucker (<i>Xyrauchen texanus</i>), as well as important habitat for the state/BLM sensitive flannelmouth sucker (<i>Catostomus latipinnis</i>), bluehead sucker (<i>Catostomus discobolus</i>), and roundtail chub (<i>Gila robusta</i>). Bighorn sheep (<i>Ovis canadensis nelsoni</i>) inhabit the rocky precipices of the lower river. The corridor is used by migrating southwestern willow flycatcher (<i>Empidonax traillii extimus</i>) (T&E species), and yellow-billed cuckoo (<i>Coccyzus americanus</i>) (T&E species). The San Juan River provides important riparian habitat for several species of wildlife including the bighorn sheep, amphibians, neo-tropical birds, and waterfowl.
9232-4	A Utah citizen conservationist		I support the designation of all the ACECs proposed in Alternative E, especially the large Aquifer Protection ACEC. Protecting healthy landscapes in these ACECs is more effective than attempting to restore degraded ones. ACECs are appropriate in BENM to provide an extra level of management attention and protection.	ACEC03-Nominated ACECs	All ACECs listed in Alternative E, with the exception of John's Canyon ACEC, would be designated under the Proposed Plan.
18238-37	Chaitna Sinha		We propose: BLM must adopt the Aquifer Protection Boundaries specified in Alternative D because there is no evidence that the much smaller acreage proposed in Alternative E would protect the relevant and important values for which the ACEC was nominated or adequately protect Monument objects and values. As noted by BLM, the relevant and important values for which the ACEC was nominated extend across the BENM, and protecting only a small fraction of the acreage as proposed in Alternative E is simply not appropriate to encompass the relevant and important values and geographic extent of the special management attention needed to provide protection. The proposed ACEC in Alternative E also fails to adequately protect watersheds, riparian areas, and associated wildlife and plants all of which are Monument objects and values.	ACEC03-Nominated ACECs, ALTO5-Alternative E	See the Proposed Plan in the Special Designation section of Chapter 2, which includes changes to ACEC designations. Impacts from ACEC designations on relevant and important values are discussed in the Areas of Environmental Concern and Research Natural Areas section of Chapter 3. The ACEC under the Proposed Plan incorporates portions of the aquifers and aquifer systems serving as primary drinking water sources for communities near BENM, including White Mesa, Bluff, and Blanding, and the public drinking water systems at NABR and Sand Island Ranger Station. This area includes important recharge areas on BLM-administered lands related to these public drinking water systems, the proposed sole source aquifer area for the community of White Mesa, and the GPZ surrounding NABR as designated by the State of Utah. Proposed management actions under other resources would provide similar protections to the special management for the rest of BENM. For example, water resources in BENM would be managed to maintain and enhance water quantity and quality, desired mix of vegetation types, and landscape/riparian/watershed function to protect BENM objects, which would provide protection to Natural Systems/Aquifer Recharge values.
16784-30	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP identifies the Johns Canyon area as a paleontological ACEC. SVP notes that other areas of the monument have as much paleontological potential as Johns Canyon. Given the paleontological investigation in Johns Canyon and its potential for future scientific discoveries, we would endorse permitted paleontological collections following PRPA.	ACEC03-Nominated ACECs, ALTO7-Modification of Existing Alternatives, PALEOGE003-Paleo	The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
16784-31	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP states, Under Alternative A, the Johns Canyon Paleontological ACEC would not be designated. Surveys would be required in PFYC Classes 4 and 5 prior to implementing discretionary actions. SVP would recommend surveys with collection and salvage of at-risk fossils for any of the Alternatives A through E prior to discretionary actions that would potentially harm fossiliferous areas. It would be helpful to include language that explicitly mandates the collection and salvage of these resources.	ACEC03-Nominated ACECs, ALTO7-Modification of Existing Alternatives, PALEOGE003-Paleo	The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
16784-32	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP proposes Johns Canyon Paleontological ACEC under Alternative D and discusses paleontological investigation only in the context of the survey prior to surface-disturbing activities. The pursuit of paleontological research the mechanisms for collecting (i.e., surface collections or excavation) should be stipulated based on the regulations in PRPA.	ACEC03-Nominated ACECs, DECI07- Compliance with other laws and policies, PALEOGE003-Paleo	The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
18803-1	Shane Shumway Blanding, UT 84511		The BLM should not be designating any new ACECs. The State of Utah, which is sovereign, controls the water rights within the state. For the BLM to come and try to lay claims on how best to manage the aquifers and waters is completely out of their jurisdiction.	ACEC03-Nominated ACECs, DECI07- Compliance with other laws and policies	See the Proposed Plan in the Special Designations Section in Chapter 2. The Proposed Plan designates one new ACEC, the Aquifer Protection ACEC, which was nominated during the RMP process. The special management prescriptions for the Aquifer Protection ACEC are necessary to protect natural system/aquifer recharge, scenic, cultural, and paleontological relevant and important values. The special management prescriptions would not interfere with state water law. Further, nothing in Proclamation 10285, the BENM Proposed RMP, or Utah state law would preclude the BLM or USDA Forest Service from obtaining or maintaining appropriative water rights, as appropriate, where the agencies meet state water law requirements.

Table U-4. Air Resources

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18082-16	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Goals and Objectives We recommend revising the first goal and objective to the following: Protect and enhance air quality and air quality related values at sensitive areas (e.g., Class I and Class II areas) contained in and near BENM by ensuring that all authorized uses on public lands comply with and support federal, state, and local laws and regulations for protecting air quality.	AIRO1-General, ALT07-Modification of Existing Alternatives	Class I areas hold special status in the Clean Air Act for protection of air quality and air quality related values that are not provided to Class II areas. All other management actions common to all alternatives are specific to protecting air quality in Class II areas, since BENM is a Class II area. See changes to the Goals and Objectives of the Air Quality Section in Chapter 2.
18082-17	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Management Actions Common to All Alternatives We recommend revising the first management action to the following: Manage emissions and discretionary actions in BENM to enhance air quality; maintain wilderness character for lands with wilderness characteristics, wilderness study areas, recommended wilderness, and designated wilderness; and to protect BENM objects, values, and resources.	AIRO1-General, ALT07-Modification of Existing Alternatives	Management actions and discussion of impacts relating to lands with wilderness characteristics, designated wilderness, and wilderness study areas are described in Chapter 2 and Chapter 3. The Proposed Plan contains management actions for wilderness areas, wilderness study areas, and lands with wilderness characteristics according to their Class II designation. It is beyond the agencies' authority to reclassify Class II wilderness areas, study areas, or lands with wilderness characteristics as Class I areas.
18082-18	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend a management action that states, Do not authorize actions, or mitigate the air quality effects of actions, that may be expected to or are shown to (1) cause or contribute to exceedance of the National Ambient Air Quality Standards (NAAQS) or (2) cause or contribute to exceedance of the limit of acceptable change for visibility, in deciviews, based on the current version of the Federal Land Managers Air Quality Guidance or equivalent or (3) cause or contribute to exceedance of critical loads for deposition based on the most current information available, or in areas where deposition is already of concern, the limit of acceptable change based on the most current version of Federal Land Managers Air Quality Guidance or equivalent.	AIRO1-General, ALT07-Modification of Existing Alternatives	NAAQS are enforced by UDAQ with EPA oversight. Special requirements to reduce potential air quality impacts would be considered on a case-by-case basis in processing land use authorizations under the Proposed Plan. See the Proposed Plan for Air Quality table. See also the Management Actions Common to all Action Alternatives section for Visual Resource Management, Night Skies, and Soundscapes. The agencies considered and referenced the Federal Land Managers' Air Quality Related Values Work Group Phase I Report (See Air Quality in Chapter 3 and Literature Cited).
18082-20	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend revising the following management action: The agencies would manage emissions to prevent adverse impact to air quality in Class I airsheds to include Class II airsheds.	AIRO1-General, ALT07-Modification of Existing Alternatives	Class I areas hold special status in the Clean Air Act for protection of air quality and air quality related values that are not provided to Class II areas. All other management actions common to all alternatives are specific to protecting air quality in Class II areas, since BENM is a Class II area. See changes to the Goals and Objectives of the Air Quality Section in Chapter 2.
18082-22	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend a management action that addresses lake acidification thresholds, as developed by USFS and other Federal Land Managers, by allowing no more than a 10% change from established baseline for lakes with an acid neutralizing capacity of greater than or equal to 25 eq/l, and for lakes with an acid neutralizing capacity of less than 25 eq/l, allowing no more than 1 eq/l decrease in acid neutralizing capacity.	AIRO1-General, ALT07-Modification of Existing Alternatives	All emission sources within the Monument would be minor sources. Federal Land Managers Air Quality Values Working Group (FLAG) as referenced by the commentor is specific to major emissions sources that would trigger Prevention of Significant Determination (PSD) requirements. Development of major emissions sources would not be consistent with protection of BENM objects and therefore the management action being requested by the EPA would never come into use; the minor source emissions activities within BENM would have a negligible contribution to lake acidification.
18082-23	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend adding a management action to reduce GHG emissions from BLM-authorized activities to the greatest extent possible.	AIRO1-General, ALT07-Modification of Existing Alternatives	The agencies are required to follow all laws and regulations regarding emissions reduction. Management Actions Common to All Action Alternatives in the Air Quality section includes managing emissions and discretionary actions in BENM to ensure compliance with state and federal air quality standards.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18082-26	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	On p. 3-270, Table 3-67 estimates the annual air pollutant emissions [tons per year (tpy)] by source (livestock grazing, prescribed fires and vegetation management, and recreation and travel management). The table notes that the source of the emissions inventory was prepared in coordination with BLM resource specialists based on historical data indicative of existing management activities under the No Action Alternative. We recommend the Final EIS substantiate this table with a comprehensive emissions inventory, like the one suggested above, for each of the alternatives to assess the potential impacts of BLM-authorized activities under the proposed RMP and to assist the reader with making a reasoned choice among alternatives. Please identify areas where assumptions were used to generate emissions estimates.	AIRO1-General, DATA01-Analysis Methods and Data	An emissions inventory based on existing data on authorized activities was prepared. NEPA does not require new data to be generated. The emissions inventory is within the NEPA rule of reason, which allows agencies to determine, based on their expertise and experience, how to consider an environmental effect, and prepare analysis based on the best available information. These emission estimates are anticipated to be representative of both current conditions and conditions under the action alternatives evaluated in the RMP/EIS for most emissions-generating activities, based on limitations on resource uses in BENM under Proclamation 10285 and management alternatives described in the RMP/EIS. Changes in quantifiable emission estimates by RMP/EIS alternative are anticipated only for livestock grazing and are accounted for in the analyses contained in the RMP/EIS, under Chapter 3 for Air Quality. However, the data has been updated for livestock grazing, construction dust, paved and unpaved road dust, prescribed fire and wildlife in the Affected Environment for Air Quality in Appendix N with the finalized emissions inventory (US EPA 2023b). The main source of PM2.5 and PM10 in the Planning Area counties was from unpaved roads followed by dust from agricultural sources such as crop and livestock sources.
18082-27	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We also recommend the BLM review the information in Table 3-67 to make sure it is accurate. For instance, PM10 emissions for recreation and travel management in Table 3-67 are 336 tpy. However, the PM10 emissions in Table 3-64 for paved and unpaved road dust for both San Juan and Garfield Counties is 4,439 tpy. If the information in Table 3-67 is accurate, we recommend the Final EIS explain the basis for the emissions difference. This is an example of why it is important to have a comprehensive baseline emissions inventory and a separate emissions inventory for each of the alternatives so that the reader can understand the magnitude of impact specific sources are having within the Monument, as well as how decision-making regarding the various resources and uses could change those impacts.	AIRO1-General, DATA01-Analysis Methods and Data	The Annual Criteria Air Pollutant and Hazardous Air Pollutant Emissions by Source table in the Air Quality section of Chapter 3 represents estimated emissions from authorized activities in the Monument, which would be a fraction of those in the 2020 Emissions Inventory by Source table which include emissions from all activities and all land designations in the county, including lands outside the Monument. Also see response to 18082-26. 18082-26: 'An emissions inventory based on existing data on authorized activities was prepared. NEPA does not require new data to be generated. The emissions inventory is within the NEPA rule of reason, which allows agencies to determine, based on their expertise and experience, how to consider an environmental effect and prepare analysis based on the best available information. These emission estimates are anticipated to be representative of both current conditions and conditions under the action alternatives evaluated in the RMP/EIS for most emissions-generating activities, based on limitations on resource uses in BENM under Proclamation 10285 and management alternatives described in the RMP/EIS. Changes in quantifiable emission estimates by RMP/EIS alternative are anticipated only for livestock grazing and are accounted for in the analyses contained in the RMP/EIS, under Chapter 3 for Air Quality. However, the analysis has been revised to be consistent with the finalized emissions inventory (US EPA, 2023b) which provides a summary of methods, assumptions, and results.

Table U-5. Analysis Methods and Data

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19035-8	Gail Johnson		I submit that the White Canyon Allotment (along with the other grazing allotments in BENM) is a Traditional Cultural Property and the livestock grazing is a Traditional Cultural Practice and should be recognized as eligible for nomination for historical preservation under the National Historical Preservation Act of 1966. I believe the agencies must consider the effect of the alternatives in the RMP draft on this historic property and practice before the RMP is approved.	DATA01; HIST001	While livestock grazing is a use noted in the Proclamation, it is not itself an object. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources in Chapter 2. The Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 98% acres of grazing currently available for grazing would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts. No additional acres of the White Canyon Allotment would be made unavailable under the Proposed Plan.
19017-10	Sylvia Stubbs	San Juan County	The proposed high percentages of VRM I and II particularly in Alternatives D and Eis overly restrictive and would likely preclude the development of future infrastructure (including range improvements and communications facilities) needed for management of the Monument. Additionally, the logic and credibility of the VRM and SIO systems would suffer if large areas are "converted" from their current VRM III and IV and lower SIO classifications to higher 3 classifications as in Alternatives D and E. This may be alright for analysis purposes in a range of alternatives but would not be practical. If an area is currently rated as VRM III or IV or a lower SIO class, is it credible to "magically convert" such classes to the highest classes with the stroke of a pen? Visual resource ratings should be consistent with current conditions as rated through agency evaluation procedures. We recognize that there is some leeway in making these evaluations. We recommend selecting a higher ratio of existing visual classifications to contrived classifications for practical management. Such a management strategy would still provide protection for BEM objects.	DATA01; VIS01	VRM was adjusted in the Proposed Plan that would allow for development of infrastructure that is discussed in the comment The Proposed Plan would manage WSAs, protected LWC, certain ACECs, WSR segments, and Designated wilderness as VRM Class I and SIO Very High (See Visual Resource Management, Night Skies, and Soundscapes Table in Chapter 2. Areas managed as VRM Class II and Class III were updated and would allow for the sort of infrastructure the commenters points to. Site specific NEPA analysis would determine appropriateness of specific locations and actions of proposed projects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18383-1	Cassie Rose		In the Navajo Management Plan, it was stated that the cows graze all the grass, leaving no vegetation for the prairie dogs because the prairie dog eat the same plants as cattle, as a result the eagles die because they have no prairie dogs to hunt and feed upon. It was referenced for the research being done by Preston 2021 and Wadsworth 2021. I wanted to do additional research myself and read this information. What I found was on the Sited References that was provided, these references where not in the back of the book. I could not research this any further to see if this was REALLY stated as quoted in the Navajo Management Plan for the Bears Ear Monument. Therefore, the Draft RMP/EIS is incomplete.	DATA01-Analysis Methods and Data	The resources the commentor discusses are cited in the Bears Ears Inter-Tribal Coalition: A Collaborative Land Management Plan for the Bears Ears National Monument, Appendix L. The agencies are not responsible for the completeness of the citations of the Bears Ears Inter-Tribal Coalition: A Collaborative Land Management Plan.
9372-4	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	On Page 21 paragraph 2, the management plan claims that this area is not significantly protected. Such a claim has no basis. There are many layers of protection in place to protect archaeology, off-road use, grazing regulations, extraction, and all other users.	DATA01-Analysis Methods and Data	This language is paraphrased from Proclamation 10285, which found that a reservation under the Antiquities Act is required to adequately protect BENM objects.
18082-24	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Table 3-64 includes the 2020 National Emissions Inventory (NEI) data by source (crops and livestock dust, construction dust, paved road dust, unpaved road dust, prescribed fire, wildfire, and other) and by county (San Juan and Garfield Counties). While this information can be useful, we recommend the BLM produce an emissions inventory of existing emissions for BENM (not by county), including industrial point sources, non-point sources, mobile sources, and area sources to provide a baseline for comparison against the alternatives to assess whether BLM-authorized activities have potential regulatory or human health significance.	DATA01-Analysis Methods and Data, AIR01-General	Air quality is evaluated on an airshed basis which may include activities outside of the Monument. Airsheds do not follow administrative boundaries, and EPA's own NEI is the best available information to describe the air quality of the affected airsheds. An emissions inventory was prepared for authorized activities as shown for the No Action alternative (i.e. baseline; Air Quality, Chapter 3.). It would go beyond NEPA to create and emissions inventory for industrial sources and other sources which agencies don't have regulatory authority. The agencies do not have the capability of producing an emissions inventory similar to the NEI (Industrial point, non-point, mobile, and area sources) for just the BENM area. Such an inventory would be best prepared by the Utah Division of Air Quality or the EPA. Additionally, air pollutants are not confined to administrative boundaries, but rather airsheds. The description of the affected environment is best described by the county level emissions inventory from the 2020 NEI. Changes from existing emissions management are reflected in the Air Quality Section of Chapter 3.
18082-25	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS at Table 3-66 shows the 8-hour ozone data in the planning area between 2012 and 2022 (p. 3-264). The analysis did not characterize the rest of the NAAQS for the planning area or existing conditions for AQRVs. In the Affected Environment analysis, we recommend the Final EIS include the design values for each of the NAAQS pollutants, existing conditions for AQRVs, and a trends analysis for both the NAAQS and AQRVs. This information is important because it reflects monitored data rather than reported data. We also recommend considering adding charts or graphs illustrating the trends for visibility and deposition.	DATA01-Analysis Methods and Data, AIR01-General	BENM does not meet EPA requirements for air quality monitoring [40 CFR Part 58], specifically thresholds for populations and pollutants are below 80% of the NAAQS. As a result, there are no monitors for air pollutants other than ozone. Without monitors the airshed is assumed to be attaining the NAAQS. No other monitors in the state are representative of the airshed, therefore monitoring data on other criteria air pollutants have not been collected.
18238-9	Chaitna Sinha		Moreover, in consideration of the long-term aridification that the Southwest is experiencing, even the recharge rates at higher elevations need to be re-evaluated, particularly in light of the proposed wells and their assumed life spans. Stable isotope tracing, including springs in the proposed project area, could reveal the residence time for groundwater emerging from springs.	DATA01-Analysis Methods and Data, ALT05-Alternative E, WAT03-Groundwater (including quality/ quantity, Groundwater Protection Zones (GPZs))	In the Proposed Plan it states that "Under all alternatives, agencies would conduct comprehensive monitoring to track water quality conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects. Additionally, under all alternatives, agencies would conduct a groundwater study on the Cedar Mesa Sandstone and N aquifer to better understand characteristics, current conditions, recharge areas, recharge rates, groundwater budget (inflow vs. outflow), travel time, and springs". A hydrologic study would be required for all proposed discretionary land uses supporting groundwater withdrawals.
12746-15	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	The Proposal is tasked with creating a plan balancing many values after the Proclamation including wildlife, water, cultural and historical resources, scenic values and recreational values. Some multiple uses are of higher priority when the balancing of uses occurs and others are limited or removed under the Proclamation. Of the multiple uses generally available on public lands, the only general classes of values removed from analysis by the Proclamation is oil and gas exploration and drilling. Even those values that are reduced or limited, such as grazing, are still provided detailed analysis. While some values are addressed in signicant detail in the analysis, foundational information necessary to address critical values, such as cultural resources are not provided at all. This is despite the Proclamation identifying multiple classes of cultural resources, including cultural sites and cultural landscapes. While we are familiar with the management of cultural sites, we have never addressed cultural landscape management and are unable to locate any regulations on this type of management.	DATA01-Analysis Methods and Data, CUL01-General	The agencies will follow law, regulation, and policy for analyzing historic properties including cultural landscapes and historic landscapes. See regulations for the National Register of Historic places promulgated by the National Park Services, specifically see 36 CFR Part 60 and further guidance in National Register Bulletin 18 https://www.nps.gov/subjects/nationalregister/upload/NRB18-Complete.pdf . The above reference provides further policy guidance on historic/cultural landscapes. The discussion and analysis found in Cultural Resource Management, Indigenous Peoples' Religious Concerns, and Tribal Use Section of Chapter 3 addresses cultural landscapes. See Appendix N Affected Environment that explicitly discusses Traditional Indigenous Knowledge and the Traditional Cultural Property site type of the National Register of Historic Places within the BENM Planning Area landscape. Cultural resources are considered in detail in Appendix N, Section 3.5. Also see Appendix O for a discussion of consultation that occurred during the planning process.
12746-2	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	Thirdly, significant portions of analysis simply do not have any factual accuracy, such as the economic analysis and the complete lack of cultural resource inventory information despite the Proclamation identifying several different cultural values to be protected, such as cultural sites and cultural landscapes. The Proposal introduces entirely new planning concepts, such as a cultural landscape, but fails to provide any definition used in the development of the Proposal or that could be used in any subsequent site-specific planning efforts. Without basic definitions and analysis on landscape level foundational terms and concepts such as cultural landscape or what a soundscape management plan would require, how can subsequent planning be guided by the RMP. We are unable to find any definitions for these and many other concepts in BLM regulations or existing statutes further compounding the failure of the Proposal on this issue. When our efforts forced us to seek other authorities for a possible definition of a cultural landscape, these definitions simply failed to align in any way with the concepts or analysis in the Proposal. The Proposal not only fails to align with third party definitions of cultural landscapes, and fails to provide any cultural standards at all. Is	DATA01-Analysis Methods and Data, CUL01-General, NOISE01-General	Analysis of potential impacts was conducted using cultural resources survey data provided by the agencies and included all formally documented archaeological sites located within the Monument boundaries. Analysis of potential impacts from alternatives, including site counts where available, are presented for Cultural Resources in Chapter 3. Proclamation 10285 notes that cultural landscapes are important objects of the Monument. The agencies will follow applicable laws, regulations, and policies for analyzing historic properties while implementing future projects, including cultural landscapes and historic landscapes, specifically see 36 CFR Part 60 and further guidance in National Register Bulletin 18 https://www.nps.gov/subjects/nationalregister/upload/NRB18-Complete.pdf .

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			a cultural site more protected than a cultural landscape? Is there a certain density of cultural sites necessary to have a cultural landscape? Is the entire Monument a cultural landscape? How many cultural sites have been identified already in the planning area? We simply do not know.		
14767-54	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Manual 6100 provide further NLCS specific requirements and policy. 1.6 Policy. A. General Principles for the Management of NLCS units 1. As required under the Omnibus Act of 2009, the BLM will manage NLCS units to conserve, protect, and restore nationally significant landscapes. 2. As also provided for under the Act, the Secretary of the Interior, through the BLM, shall manage the... [NLCS] ...in accordance with any applicable law (including regulations) relating to any component of the systemand...in a manner that protects the values for which the components of the system were designated. Accordingly, site-specific activities requiring BLM approval, including Bureau initiated actions, will be managed in a manner consistent with the protection of those values. Multiple uses may be allowed to the extent that they are consistent with the designating legislation or proclamation, other applicable laws, and all relevant policies (including NLCS policy guidance).(emphasis added) What this demonstrates is that the BLM, in NLCS units, must prioritize the conservation, protection and restoration of these nationally significant landscapes above BLMs standard multiple use approach. The BLM utterly failed to implement these requirements in the EIS and DRMP, instead treated these lands as if permitting livestock grazing was mandatory. Again, the BLM has put the cart before the horse and determined that livestock grazing will continue essentially in a status quo manner without any rational or logical analysis or determination that its status quo approach is consistent with the designating legislation or proclamation. Again, the BLM failed to make this basic NLCS requirement common to all alternatives nor, and more fundamentally, has the BLM provided an analysis (AMS) of what level of livestock grazing could be allowed to the extent that they are consistent with the designating legislation or proclamation. This is a fatal error that must be corrected.	DATA01-Analysis Methods and Data, DECI07-Compliance with other laws and policies	The Proposed Plan complies with all applicable laws and policies. Section 302 of FLPMA states that public lands should be managed under the principles of multiple use and sustained yield “except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.” Proclamation 10285 dedicates the lands within BENM to a specific use, therefore the lands reserved within the Monument boundary must be managed in a manner that protects the objects for which the Monument has been designated. In other words, within BENM, typical multiple use management is superseded by the direction in Proclamation 10285 to protect Monument objects. Multiple uses are allowed only to the extent they are consistent with the protection of the objects within the Monument. See Appendix B: Laws, Regulations, Policies, and Plans considered in the Development of the Resource Management plan and Environmental Impact Statement. Implementation level planning will analyze the impacts of the proposed actions on BENM objects and implement the Proposed Plan to protect BENM objects. Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." The Proposed Plan provides direction towards implementation of grazing permit renewals and allotment management plans. Grazing management in the Proposed Plan is designed to protect resources, including objects of the Monument.
12746-33	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	Given the diversity of the above definition, the Organizations will again assert the need for a single starting point for NEPA analysis. This definition is not provided in BLM regulations, the Proclamation or the Proposal. Clearly if the three categories of designation are being applied in the Proposal, there are areas where expanding recreational access would be entirely consistent with the definition of a cultural landscape that is created by man. If the Proposal seeks to apply all three subcategories of the definition, then each subcategory should be mapped and identified along with permitted uses and levels of protection for each subcategory. This simply has not happened, and as a result, this portion of the Proposal falls well short of the maximum public engagement required under the Proclamation or needed to satisfy NEPA.	DATA01-Analysis Methods and Data, DECI07-Compliance with other laws and policies, CUL01-General	See regulations for the National Register of Historic places promulgated by the National Park Services, specifically see 36 CFR Part 60 and further guidance in National Register Bulletin 18 https://www.nps.gov/subjects/nationalregister/upload/NRB18-Complete.pdf . The guidance states that a cultural landscape is, "a geographic area (including both cultural and natural resources and the wildlife or domestic animals therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." Proclamation 10285 notes that cultural landscapes are important objects of the Monument.
12746-38	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	We are very concerned that without national standards and guidelines for this type of plan, this effort would result in immense conflict between uses, at best would be hugely subjective in nature, and would be problematic to defend in any legal action. Legally management plans that have attempted to manage sound on public areas have a low percentage of surviving legal challenges given the large number of protected Constitutional rights that can be impacted. We are unable to identify any portion of the Proposal that addresses how basic constitutionality of a soundscape plan would be achieved as one of the primary challenges to soundscape efforts has been Constitutionally protected frees speech of the public. Rather than avoiding the systemic failures that have plagued this effort this requirement seems to embrace the desire to continue to plan based on inaccurate or non-existent requirements, such as the cultural landscape concept.	DATA01-Analysis Methods and Data, DECI07-Compliance with other laws and policies, NOISE01-General	The Proposed Plan is consistent with applicable laws and regulations. The soundscape management plan is an implementation plan to mitigate effects from BENM uses, including education about soundscapes and their importance to BENM and Tribal Nations, and will include public involvement.
18995-3	Tim Allen	National Rifle Association; National Shooting Sports Foundation; Boone & Crockett Club; Rocky Mountain Elk Foundation; Delta Waterfowl; Congressional Sportsmens Foundation; Association of Fish and Wildlife Agencies; Public Lands Foundation; Dallas Safari Club; Wild Turkey Federation; Archery Trade Association	Another significant flaw in the LUP/EIS is its references to textbook-like impacts of firearm discharge. Those references fail to make the case for closures. For example, under 3.5.7.2.7 of Alternative E - Impacts from Recreational Shooting, it states, "Additionally, such management would provide environmental benefits by preventing noise pollution and lead fragments from bullets leaching into soils and waterways, protecting wildlife from lead poisoning (emphasis added)..." The LUP/EIS does not describe factors that would cause lead to leach into soils such as the soils being acidic in nature (uncommon in BENM) and high precipitation.	DATA01-Analysis Methods and Data, DINGELL01-mentions Dingell Act, REC06-Shooting Sports/Hunting/Fishing	Thank you for your comment. The agencies have added additional information and clarification in the Wildlife section of Chapter 3 in regards to impacts from lead poisoning associated with wildlife, including factors that cause lead to leach into soils.

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18657-67	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The Biden Administrations focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The BLM is therefore required by this executive order and others mandating that federal agencies consider environmental justice in NEPA proceedings to consider whether any restriction or closure of OHV access imposed by the BENM RMP would disproportionately harm disabled users ability to access public lands. It is imperative that the BLM consider the access needs of disabled users in considering the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access. Such consideration is also required by the BLMs recently adopted Equity Action Plan that was released by the Department of Interior in April 2022. The Equity Action Plan recognizes that off-road routes create a form of access to public land for those with disabilities, and specifically identifies limited physical access as a barrier that prevents people with disabilities from recreating on public lands. Limiting the areas motorized vehicles can access limits those users who want to experience public land and contradicts the agency's Equity Action Plan. Therefore, BLM should analyze how the proposed closures would undermine the objectives of the Equity Action Plan.	DATA01-Analysis Methods and Data, EJSOC02-EJ Populations	Additional information was added to the Environmental Justice and Social and Economic Values section of Chapter 3 to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment. The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws.
17573-49	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, at least three independent studies have shown that through multiplier effects, each AUM permitted for use in the region generates approximately \$100 in economic activity within Utahs counties. Ranchers hire workers, make payments on bank loans, buy supplies, and engage in other types of commercial activity, stimulating economic ripple effects within the community. Even when agricultural enterprises lose money in the region, this serves as a means of channeling a flow of money from outside the region into the communities within the BENM area. An evaluation of the economic hardship that is sure to follow a drastic reduction of grazing on the BENM should be fully analyzed in the next phase of this planning process as it deserves to be given due consideration. The Utah SRMP recognizes and supports the responsible use of public land for livestock grazing as an integral part of Utahs agricultural economy.30	DATA01-Analysis Methods and Data, EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	The Environmental Justice and Social and Economic Values section of Chapter 3 discusses grazing contributions to the region's economy, and the multiplier impacts resulting from grazing activities. The discussion of environmental consequences for grazing activities is documented in the Proposed Plan using IMPLAN analysis, which clearly depicts these multiplier impacts from indirect and induced impacts. The Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 97% of BENM lands that are currently available would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.
552-2			The document mentions managing fires with the use of fire retardant foam (section 2.4.17.3. management actions by alternative, Table 2-16. Alternatives for Fire Management). Although using fire retardant to manage fire can be useful, it can also cause problems for people and the environment and we feel this be further investigated if it is part of the alternatives for fire management. Firefighters and residents near treated areas may be exposed to chemicals in fire retardants, which could have respiratory or other health effects (Burke 2017). The safety of these substances for people in the vicinity, especially over long periods, is a concern. Fire retardants are also known to cause long-term changes in soil, making it harder for plants to grow properly, which is of high concern for areas with rare and native plants (Segev 2009). If native and rare plant species are significantly impacted by the fire retardant, they may die off, accelerating invasive plant encroachment and permanently changing the plant community. Additionally fire retardant used near water may runoff into rivers and streams polluting surface and groundwater that is crucial for human and wildlife use (Segev 2009). Fish and aquatic insects may be harmed by the runoff from fire retardant negatively affecting their life cycles. And finally, fire retardant remains in the environment for long periods of time and can continue to damage ecosystems (Segev 2009). Fire retardants should be something considered as an emergency only fire management protocol.	DATA01-Analysis Methods and Data, FIRE01-General	Under the Proposed Plan, fire retardant or other chemical spraying would not be used within 300 feet of perennial waterbodies except for the protection of human lives, and that potential damage to other ecological or cultural resources should be considered when using foam retardant. Additionally, BMPs would mitigate the potential impact of chemical retardants on soil and Minimum Impact Suppression Tactics (MIST) techniques would be implemented on lands with wilderness characteristics to preserve apparent naturalness, and this includes reducing the use of fire retardant.
552-3			Another alternative mentioned being used is prescribed burns. Bears Ears National Monument is dominated by the sagebrush and pinyon pine plant communities that can typically handle a prescribed burn well. However, there are several concerns and risks relating to prescribed burns that were not addressed in the alternatives. One of the most significant risks of prescribed burns is that they can escape control leading to an unintentional wildfire. This may happen due to unexpected changes in weather, and wind shifts. Creating a management plan to account for an escaped prescribed burn should be included in the alternatives. Prescribed burns also produce a lot of smoke, decreasing the air quality. This may be of high concern to nearby communities with individuals suffering from respiratory issues. Communication with the public when issuing a prescribed burn should be described in the management plan. Another concern regarding prescribed burns is the potential for introduced, non native plant species to encroach the landscape. Prescribed burns may reduce the density of native vegetation that competes with introduced species for resources(Coulter 2010). With fewer competitors, non-native plants can more easily establish and spread(Coulter 2010). Certain soils are more susceptible to disturbance than others making invasion by non-native plants more likely to occur(Coulter 2010). This leads us to want to understand the criteria that prescribed fire is going to be used, and in what areas? A particular nonnative of concern is cheatgrass (Bromus tectorum) (Bradley 2018). Cheatgrass may become more established after fires due to increasing climate change (Bradley 2018). Surveying the land to determine transitional states would be a method to determine where and when to issue a prescribed burn. We feel this is an important alternative that should be thoroughly investigated prior to scheduling a prescribed burn in this plant community.	DATA01-Analysis Methods and Data, FIRE01-General	Prescribed burning is addressed in additional detail in regional Fire Management Plans and would be analyzed through implementation level site-specific NEPA. Appendix G includes BMPs to minimize potential impacts to vegetation productivity and mitigate impacts from smoke and emissions from prescribed burning. In Chapter 2 Water Resources, the Proposed Plan includes management actions for controlling the spread and introduction of invasive species. In Chapter 2 Cultural Resources, the Proposed Plan states agencies would coordinate with the BEC, Tribal Nations, and UDEQ to time and implement prescribed burns to minimize smoke impacts. Impacts of fire (prescribed burning and wildfire) on vegetation and air quality are discussed in Chapter 3 Air Quality, and Terrestrial Habitat and Vegetation Resilience and Conservation respectively.

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18082-39	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Table 3-145 on p. 3-453 indicates that grazing is restricted on certain acres of BLM and USFS land within the planning area under Alternative D, but not the Preferred Alternative. According to the Draft EIS, the BLM reviewed monitoring data and remote sensing data to better understand land health and ecosystem function, identifying departed watersheds and departed vegetation and soil conditions. In these departed areas, the BLM would consider discontinuing livestock grazing under Alternative D (p. 2-8). The EPA recommends that these monitoring and remote sensing data are included in Appendix I, Supporting Data for Water Resources. We also recommend summarizing these data in the Final EIS. We support allowing for the discontinuation of livestock grazing in those departed watersheds in the Final EIS chosen alternative.	DATA01-Analysis Methods and Data, GRAZ01-General	The Proposed Plan includes additional acres on BLM-administered lands made unavailable to grazing or limited to trailing only than is currently grazed. AIM data used to inform the development of alternatives, including Alternative D, are provided in Appendix K.
14767-56	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	9. The BLM will use the best available science in managing NLCS units. Again, the BLM failed to comply with this requirement, that should be the basis for all alternatives. Current range science has been ignored as well as current science on biological soil crusts.	DATA01-Analysis Methods and Data, GRAZ01-General	Agencies used best available science to develop the Proposed Plan. See Volume 2 of the EIS, Literature Cited for the Soils and Biological Crust references and Livestock Grazing resources.
14767-67	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The BLM must analyze, in a site-specific way, the capability of these allotments to provide forage for livestock. This analysis needs to assess the need for vegetative and BSC recovery, the availability of forage, the distances to water, and slopes not to exceed a certain limit depending on soil types along with the protection and recovery of all Monument objects. Forage produced on highly erosive soils must be removed from consideration. NLCS requirements must be factored into the analysis of forage availability, lands available for livestock. The BLM studiously avoided this issue.	DATA01-Analysis Methods and Data, GRAZ01-General	The RMP is a landscape level management plan that covers a large area and broad range of different resources. Site-specific studies and analysis to fine tune management of grazing allotments will be conducted through implementation level planning including grazing permit renewals guided by the development of Land Health Evaluations which take soil types, forage availability, and upland range monitoring data in comparison to the reference NRCS ESD. In Chapter 2 Section Detailed Descriptions of the Alternatives the Proposed Plan identifies 7 priority allotments for which the BLM will complete land health assessments, and, if needed, causal factor determinations. The BLM will then complete appropriate NEPA and Section 106 compliance and consultation to renew such permits. Additionally, the BLM has created a schedule for all allotments within BENM to fully process permit renewals.
15381-22	Sagebrush Habitat Conservation Fund		Overall, this RMP/EIS is strong in terms of goals and good intentions but noticeably short on management action or direction. At least regarding grazing, this RMP/EIS has such speculative, unquantified discussion of environmental effects it does not adequately inform a decision maker trying to make a rational decision. The entire document suffers because: 1. Actions/change agents are not clearly identified in the description of the alternatives. 2. The afore-mentioned goals and good intentions are presented as if they are actions and accomplish something. 3. Actions that are not merely aspirational are matters of existing law and/or agency policy, not discretionary management actions. 4. Actions that are identified in an alternative are described as impacts in the analysis. This leads to painfully circular reasoning. For example, the impact of eliminating x acres from grazing is that x acres won't be grazed. This is restating the obvious, circular reasoning, and meaningless in terms of informing the public or the decision maker. 5. The affected environment sections tend to be encyclopedic, generic, and lack quantification. 6. Impacts sections are also lacking in quantification and impacts are mostly described in relativistic terms.	DATA01-Analysis Methods and Data, GRAZ01-General	The Proposed Plan includes clear, land use level planning management actions. For example in Chapter 2 Livestock Grazing includes a requirement to prohibit new range improvements or modifications to existing range improvements, for livestock grazing purposes, unless the primary purpose is to protect BENM objects; and unless, on BLM-administered lands only, a current (within the last 10 years) land health assessment has been completed, and, if needed, a causal factor determination has been made for the allotment or applicable watershed. As informed by the land health assessment and causal factor determination, the new/modified range improvements would support the achievement of the BLM Utah Rangeland Health Standards. An exception to this requirement could be approved for new/modifications to range improvements to prevent imminent damage to BENM objects. There are other specific management actions related to grazing through the Proposed Plan. Chapter 3 was updated to more clearly discuss impacts of management actions, including those of livestock grazing.
17573-48	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	As analyzed in prior comments ad nauseam, livestock grazing has existed on this landscape for more than a century. It is, in a way, part of the landscape and should be protected, as an object of cultural significance, by this BENM RMP. The rich history of cattle grazing in Southern Utah, including the lands encompassed by the monument, are part of the landscape, not just through culture and tradition, but biologically as well. The fences that have been built and maintained, the water wells and ponds that have been developed, and the vegetation treatments that have been done and maintained have all had a biological effect on the landscape. Livestock grazing has improved soil health and minimized flammable underbrush in the monument. Cattle break the soil cap with their hooves, fertilize it with urine and dung rich in gut bacteria, and trample plant matter into the soil surface, including dead grasses which when left standing and oxidizing interfere with new growth. ²⁸ Grazing can stimulate biotic activity by facilitating the circulation of oxygen, carbon dioxide, and other gases, by providing nutrients, allowing penetration of water, and providing land cover to minimize or eliminate bare ground. ²⁹ BLM cannot ignore the positive impacts of livestock grazing on the lands within the BENM in this EIS. It must set forth both the positive impacts on the rangeland and the wildlife that benefit from livestock watering sources and vegetation treatments and the potential negative impacts of any proposed reductions in livestock occupancy to the rangeland and wildlife. Again, the positives of livestock grazing deserve to be given a full analysis as part of the current BENM RMP-EIS process. For similar reasons, the Agencies rejection of multiple-use management under FLPMA as inconsistent with the Proclamation is arbitrary and capricious, especially because there is no significant analysis despite BLM allowing multiple uses in other monuments.	DATA01-Analysis Methods and Data, GRAZ01-General	The agencies have analyzed the impacts of livestock grazing in Chapter 3 Livestock Grazing, including beneficial impacts. See the Proposed Plan in Chapter 2 for changes to grazing.
17573-56	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State is concerned with the AUM allocations outlined on page 2-122 of the ADEIS. The CAs have expressed concerns regarding these AUM numbers and how they were calculated. To create an accurate AUM allocation on the BENM, the Agencies should have analyzed each allotment management plan to understand whether or not the areas to be retired from grazing were calculated in the current stocking rates. If these areas, as assured to us by the Agencies, are mostly unusable and inaccessible lands, then those lands were likely not considered in the current stocking rates. When this question was raised in the July CA meeting, the Agencies were unsure as to whether this was taken into consideration. Even if these AUM allocation numbers are qualified as estimates, the	DATA01-Analysis Methods and Data, GRAZ01-General	The Proposed Plan would not alter currently allocated AUMs as outlined in Chapter 2 Livestock Grazing.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			numbers can and will be used against stocking rates moving forward whether the rangeland health studies find that stocking rates are appropriate. These numbers should be removed from the ADEIS.		
18082-38	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	On page 3-450 of the Draft EIS it states, Grazing can be used as a tool to move rangelands toward desired conditions by decreasing fine fuels and invasive weeds, thus decreasing the potential for severe wildfires (BLM 2001). See Sections 3.4.4, 3.4.5, and 3.5.4 for more information on these impacts to rangeland health and livestock grazing. However, the information in Sections 3.4.4, 3.4.5, and 3.5.4 seem to indicate that there are a number of negative ecological impacts related to livestock grazing, such as spread of invasive grasses leading to an increase in wildfire occurrence and severity. A meta-analysis of 14 years of data across 417 sites across the Great Basin does not appear to support the quoted statement on p. 3-450.13 The results of this analysis indicate that grazing corresponds with increased cheatgrass occurrence and prevalence regardless of variation in climate, topography, or community composition, which is contrary to the notion that contemporary grazing regimes or grazing in conjunction with fire can suppress cheatgrass. We recommend the Final EIS consider this meta-analysis and other best available science and monitoring data to evaluate whether and to what extent grazing decreases fine fuels and invasive weeds on the BENM, thus decreasing the potential for severe wildfire.	DATA01-Analysis Methods and Data, GRAZ01-General	The BLM used best available science to develop and analyze the Proposed Plan. BENM is within the Colorado Plateau and meta-analysis from the Great Basin in not necessarily applicable to landscapes within BENM due to differences in eco-regions. See Proposed Plan in Chapter 2 Livestock Grazing: Manage grazing to minimize or eliminate intrusion of invasive grass and plant species due to grazing-related activities.
12746-27	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	Before addressing the concerns and challenges around developing a soundscape management plan required under every Alternative, the Organizations believe it is necessary to state that this requirement is largely a novel concept and clearly not worthy of inclusion in every Alternative. At no point does the Proclamation require the development of a Soundscape Plan and the Proclamation fails to mention sound or concepts such as quiet or silence. Rather the Proclamation speaks to the solitude available in particular locations. Levels of sound are one of many planning requirements required to be addressed in existing planning for the Proclamation, and as a result we must question why a soundscape plan would thought to be necessary. It should be largely redundant to existing planning, as without a denition of what is required we again must ask how this requirement was thought to be analyzed sufficiently for NEPA purposes. While the Proposal requires a Soundscape Plan at some unspecied time in the future, the Proposal is entirely silent on a denition of what a soundscape plan is, what factors would be addressed, and how would they be measured and managed. This is highly relevant as we are unable to identify a soundscape plan currently effectively in place in the United States. We are aware of sound management efforts around airports and other activities in highly developed areas, but these are in no way similar to the Monument. In an even more troubling development, we are unable to identify any regulations, under the USFS 2012 Planning Rule or recent BLM Planning efforts that could guide the development of this type of a plan. Would the Plan attempt to apply an existing model? How would the plan address protected usages that make sound? These are basic questions that absolutely no guidance is provided regarding.	DATA01-Analysis Methods and Data, NOISE01-General	Proclamation 9558, which is incorporated into Proclamation 10285 describes the "natural quiet of the Bears Ears area" and says that "Bears Ears has that rare and arresting quality of deafening silence". In Chapter 2 Visual Resource Management, Night Skies, and Soundscapes, the night skies management plan and soundscapes management plan would be developed to mitigate effects from BENM uses, including education about night skies (e.g., celestial observations), unimpeded natural viewsapes, soundscapes, culturally important viewsheds, and their importance to BENM and Tribal Nations. The soundscape plan is an implementation plan that will be developed after this plan and will involve stakeholder considerations. Additionally, agencies would collaborate with the BEC to inventory and monitor soundscapes within BENM to identify general trends and specific effects from BLM and USDA Forest Service-managed uses within BENM.
16784-25	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP states, only a small number of these occurrences are ever prosecuted. It would be appropriate in this sentence and throughout the paragraph to report actual statistics on the number of reports of theft and vandalism and the number of prosecutions over the last 10 years. We also know of cases where educational and scientific activities have resulted in the recovery of fossils looted from the management area, including a phytosaur skull surrendered at Petrified Forest and then reunited with the remainder of the skeleton that was discovered under permit in situ in the management area.	DATA01-Analysis Methods and Data, PALEOGE003-Paleo	Specific instances of theft and vandalism may still be under investigation and those data are not available for the Proposed Plan.
16784-38	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP states, approximately one exhibit is completed every few years for public exhibition. Some of these are portable, whereas others are fixed at institutions like visitor centers, in situ fossil localities, and museum exhibit halls. This paragraph, including this sentence, is vague because it does not indicate whether statements such as these are summaries of past activity over some number of years or targets for future activities.	DATA01-Analysis Methods and Data, PALEOGE003-Paleo	The Proposed Plan in the Paleontology Resources and Geology section of Appendix N was changed to clarify that the agencies and museums regularly create exhibits for the public for interpretation and educational purposes.
12746-12	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	Secondly, these generalized assertions of benefits are made without recognition or analysis of the major or indirect components of the recreational usage asserted to be benefitted. An example of this would be assertions that more camping access is made, but there is no recognition that camping is often driven by motorized access. There is no location where motorized access would be improved making any assertion of improved opportunities like camping difficult to support.	DATA01-Analysis Methods and Data, REC01-General	The agencies have assessed impacts of recreation management actions on recreation opportunities. Management action impacts on camping opportunities are discussed in Chapter 3. Management including limiting camping around certain resources and designating campsites, could limit camping opportunities.
1817-1	Michele Dieterich 2099 Silver Ridge Rd Hamilton, 59840		Please do not allow a programmatic authorization of fixed anchors in the Indian Creek Zone of the monument. This area is already overwhelmed with climbing. Any new fixed anchor routes must be thoroughly analyzed and environmental effects considered. Has a capacity study been conducted. The area seems well beyohnd capacity as it stands.	DATA01-Analysis Methods and Data, REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new climbing routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
12746-10	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The above Organizations are vigorously opposed to Alternatives D and E of the Proposal as we are unable to align these Alternatives with the basic purpose and need of the project or the requirements of the Proclamation designating the area. While the Proclamation repeatedly identies a wide range of recreational opportunities and other values and factors to be protected in the Monument, these Alternatives consistently fail to recognize these values. 1 We are unable to reconcile protecting recreational values in an alternative that would designate most of the planning area as an Area of Critical Environmental Concern or see to develop an entirely new planning model, when compared to	DATA01-Analysis Methods and Data, REC01-General, DECI07-Compliance with other laws and policies	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			USFS and BLM planning regulations. The long-term conict and challenge of attempting to align decisions such as this with traditional BLM management, such as budgeting and efforts like Great American Outdoors Act funding would be immense. Not only does this type of designation fail to meet the purpose and need of the Proclamation, many legal concepts and standards are twisted into new denitions to support the Alternative.		Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
12746-4	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	Many of these newly proposed LWC areas are areas were previously found unsuitable for designation or management as an LWC in the 2008 Monticello RMP due to the recreational usages of these areas and various transportation routes in the area.3 Appendix O of the 2008 Monticello RMP specically identies 21 different locations that were removed from possible LWC designation due to the high levels of routes and recreation present in the area. Given the uncontested nature of development in the Monument since 2008, any assertion of Wilderness Characteristics improving in the area lacks a factual and legal basis. This new expansion of LWC areas is provided without any substantiation or support from the Proclamation, which only mentions Wilderness three times when it is discusses existing Wilderness areas in the Planning area. Again, this type of detailed discussion is not provided, and clearly, this type of an expansion of recreational restrictions in every Alternative of management would be contrary to an assertion of expanding recreational infrastructure. This type of inaccuracy gives the Organizations signicant concern regarding any of the Alternatives Proposed.	DATA01-Analysis Methods and Data, REC01-General, DEC107-Compliance with other laws and policies	The lands with wilderness characteristics were inventoried by BLM interdisciplinary teams between 1999 and 2022. With the exception of three areas which were found to have regained apparent naturalness since the last field inventory in 1999 (due in part to better vegetation treatment methods), all areas identified for LWC management are identified in Appendix O of the 2008 RMP as acres with wilderness characteristics. Also see 2008 RMP LWC map, which shows areas found not to have wilderness characteristics, areas found to have wilderness characteristics but not managed for those characteristics, and lands found to have wilderness characteristics which are also managed to protect those characteristics (Natural Areas). See Appendix A for a map of LWC under the Proposed Plan.
12746-22	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	As noted in the Western Governors' Get Out West report, public lands are a major economic driver for many Western communities that are often completely surrounded by large tracts of public lands. Usage of these public lands takes a variety of forms, but the largest user of public lands throughout the West is the recreational user. To ensure economic contributions of public lands to local communities and western states, relevant federal statutes and BLM planning documents implementing these statutes explicitly require economics to be addressed in every stage of the planning process. The BLM handbook requires planners to document economic methods in two stages before the releasing draft alternatives. The Organizations believe these mandates simply have not been complied with in the development of the Proposal and will result in long term increases in user conicts and degradation of assets and economic contributions, all of which are identied as priority concerns in the Proclamation.	DATA01-Analysis Methods and Data, REC01-General, EJSOC01-General	A detailed analysis on the impacts on economic contributions due to potential changes in recreation under each of the alternatives is provided in the Environmental Justice and Social and Economic Values section of Chapter 3.
12746-31	Scott Jones 3301 Fairway Drive Argyle, TX 7621726	ORBA, SEMA, TPA, COHVC	While the Proposal recognizes the increased conflict that will result, again no resources are identified to address this issue. We are aware that recreational shooting opportunities can be developed to address generalized shooting closures on public lands. An example of this type of strategy is exemplified by the efforts of the Arapahoe/Roosevelt NF in northern Colorado in addressing their unmanaged recreational shooting issues on the Forest.5 Again, no information or analysis is provided to streamline this type of discussion despite the fact Forests that have adopted this strategy have found the development of shooting facilities in association with landscape level shooting closures highly effective in addressing this issue.	DATA01-Analysis Methods and Data, REC06-Shooting Sports/Hunting/Fishing	Under the Proposed Plan, recreational shooting would be prohibited in BENM. See the Recreation Use and Visitor Services section of Chapter 3 for a discussion of impacts on recreational shooting closures on recreational users. Recreational shooting management intends to reduce user conflicts while protecting Monument objects. The agencies would continue to coordinate with the State of Utah on recreational uses.
18995-6	Tim Allen	National Rifle Association; National Shooting Sports Foundation; Boone & Crockett Club; Rocky Mountain Elk Foundation; Delta Waterfowl; Congressional Sportsmens Foundation; Association of Fish and Wildlife Agencies; Public Lands Foundation; Dallas Safari Club; Wild Turkey Federation; Archery Trade Association	Bias against recreational shooting is apparent in several ways. For example, closures are proposed in remote areas such as on land with wilderness characteristics where recreational shooting rarely takes place, but where hunting and the discharge of firearms is most likely to occur. However, hunting has no prohibitions or closures, nor should it. This is only to demonstrate the lack of rationale that is being used to limit or prohibit recreational shooting. In a variety of instances, the LUP/EIS speaks to recreational shooting closures to reduce the presence of trash and bullet damage to rocks, soil, and vegetation. There is little or no evidence of these impacts actually occurring in the BENM. Nonetheless, there is nothing other than prohibitions as a means of addressing recreational shooting. Similar impacts, as stated in the LUP/EIS, are occurring as a result of other forms of recreation; however, the response is to recommend some closures, seasonal closures, use by permit, etc. related to these impacting uses. It gives the clear impression that the BLM is working to accommodate all the other recreational uses, but not recreational shooting.	DATA01-Analysis Methods and Data, REC06-Shooting Sports/Hunting/Fishing, SHOOT01-not in favor of shooting closures	Under the Proposed Plan, recreational shooting would be prohibited in BENM. See the Recreation Use and Visitor Services section of Chapter 3 for a discussion of impacts on recreational shooting closures on recreational users. Recreational shooting management intends to reduce user conflicts while protecting Monument objects. The agencies would continue to coordinate with the State of Utah on recreational uses. Proclamation 10285 incorporates by reference Proclamation 9558, which states that designation of BENM does not diminish the jurisdiction and authority of the State of Utah with respect to fish and wildlife management, including but not limited to hunting. The use of firearms in the lawful pursuit of game will continue to be permitted on BENM.
18082-57	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS discusses the vegetation management impacts on soils and vegetation common to all the alternatives and states that, Although these short-term impacts could last up to 5 years, soils would be expected to stabilize as native or desired vegetation structure is established and natural soil protection (such as vegetation debris built up along soil surfaces) accumulates (p. 3-42). We recommend the Final EIS discuss how this timeframe can be impacted by climate change (e.g., long-term drought and flash flooding) and evaluate whether more conservative management actions and/or adaptation and resiliency measures are necessary for the RMP.	DATA01-Analysis Methods and Data, SOILS02-Structure, Health, Function, and Preservation of Soil Resources	Discussion of how climate change may impact vegetation and soil restoration time frames has been added to Chapter 2, Soils and Biological Crusts.
18082-48	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS describes how ground disturbing activities (e.g., livestock grazing, recreation and visitor services, lands and realty, and vegetation management), in addition to climate change, impact BSCs. We recommend the chosen alternative prioritize protection of this Monument resource.19 We recommend the Final EIS include mitigation that minimizes and compensates for adverse effects to this Monument resource and evaluate how or to what extent, based on the best available science, those measures would prevent further degradation of BSCs. This information can and should be	DATA01-Analysis Methods and Data, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	Under the Proposed Plan agencies would collaborate with the BEC in identifying areas with BSCs and classifying those crusts to best protect them. These protections could include seasonal closures of areas to visitation during drought periods and ceremonially and traditionally important times of the year or permanent closures of areas with high BSC density.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			included during Monument planning for the public to provide input and to show how BLM plans to protect Monument ROVs and meet the goals and objectives in the RMP.		
8742-2	Peter Hovingh		Although the southeastern Utah reaches of the Colorado River basin are harsh environments for aquatic and amphibious fauna, the few permanent and semipermanent waters should have a thorough multi year invertebrate survey as underwent at the 1994 Defense Distribution Depot Ogden, Utah by the U.S. Army Corps of Engineers and Montgomery Watson. I found five molluscan species and one leech species in Peters Canyon springs, a rather rich for these invertebrates, and compares with six species in the Tushar Mountains. I have noted a small spring source on Federal lands was fenced off, resulting in no surface water and no wetlands, and was a previous site for aquatic fauna. All the water sources should be surveyed for both fauna and use.	DATA01-Analysis Methods and Data, WILDFISH01-General	The management of aquatic resources within the Monument aims to preserve water quality, protect aquatic habitats, and maintain the ecological integrity of streams, rivers, springs, and other water bodies. Regular monitoring of water quality and aquatic habitats to assess environmental conditions and identify potential threats or impacts is included in the Proposed Plan (Chapter 2, Water Resources). Additionally, under Section titled Management Actions Common to All Action Alternatives for fish and wildlife species, the land management agencies plan to collaborate with the BEC, Tribal experts recognized by Tribal Nations, and applicable federal and state agencies in inventorying and monitoring BENM resources to develop a greater understanding of resource status and to provide for effective management. The list of resources includes wildlife habitat, and water (e.g. springs), and culturally important plants and animals.
9353-1	Larry Beane		Not only managed but well protected. To do this resources should be inventoried from bacteria in springs, spiders and arachnids, to eagles and large mamals.	DATA01-Analysis Methods and Data, WILDFISH01-General	In the Proposed Plan in Chapter 2 in the section titled Inventorying, Monitoring, Science, and Indigenous Knowledge, agencies would collaborate with the BEC, Tribal experts recognized by Tribal Nations, and applicable federal and state agencies in inventorying and monitoring BENM resources to develop a greater understanding of resource status and to provide for effective management. The list of resources includes wildlife habitat, and water (e.g. springs), and culturally important plants and animals.
19017-20	Sylvia Stubbs	San Juan County	p. 2-116 Table 2-20 Road Closures Alternative D (and to a lesser extent in other alternatives) includes a significant number of road closures due to these roads being within proposed OHV closed areas. Apparently these closed areas coincide with LWCs where wilderness characteristics are to be protected. Such a major closure of roads without any site specific analysis is arbitrary and contrary to the process of site specific road analysis that would be used in implementation level travel planning. Such an arbitrary method precludes meaningful public and local government input which could better inform decision-making and is inconsistent with guidance for requiring inclusion of the public and coordination with local government in land use planning. In addition, these closures would be inconsistent with San Juan County's Travel Plan which includes these roads. Closure of the roads in Bull and Imperial Valleys would also be inconsistent with Glen Canyon National Recreation Area's OHV Plan which recognizes the continuance of these roads from BLM lands onto the NRA. We recommend deferring consideration of any road closures to the travel planning (implementation level) stage.	DATA02; DECIO7; TRAVEL01	43 CFR 8342.2(b) requires the BLM to designate all public lands as either open, closed, or limited to OHVs during the land use planning process (also see MS-1626, Section 3.1, area designations). The Proposed Plan includes area designations in accordance with that legal requirement. Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. See Appendix H, Travel Management Plan Criteria. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. During the agencies review of state and county plans for consistency (see Appendix S), several inconsistencies were found in the Travel and Transportation section; however the agencies determined that the inconsistency is appropriate because the management of OHV use is consistent with the regulations at 43 CFR 8342.1, the protection of Monument objects, the Wilderness Act, and FLPMA's direction on the management of WSAs.
19007-3	Angela Marian		The Lack of Consideration: In this plan the AUM (Animal Units Month) in total may have been calculated, however the individual economic loss for each and every individual rancher was not calculated. In the Nepa law one requirement is addressing each project, taking into account all consequences.	DATA02; GRAZO1	Potential economic impacts of the Proposed Plan are discussed in the Environmental Justice and Social and Economic Values section. The agencies conducted a landscape level analysis that covers a large area and a broad range of resources. The economic impacts are discussed at a Planning Area scale appropriate to the scope of this RMP. When considering any future permit renewals for allotments within BENM, the agencies will analyze the economic impacts to the permittee and any other associates of the grazing operation, as appropriate, including if AUMs/available acreage are reduced.
19035-3	Gail Johnson		All of the alternatives have allocations of unavailable/unsuitable acres. But the criteria for what is unavailable/unsuitable isn't stated. Obviously, there must be different criteria for each alternative because each alternative has different pasture and acreage listed. This makes it impossible to comment in a substantive way. The language is unclear and lacking important information.	DATA02; GRAZO1	BLM Land Use Plan Handbook H1601. Appendix C.II.B provides the criteria for identifying lands available or not available for livestock grazing. In the Proposed Plan in Chapter 2, Livestock Grazing, livestock would be physically restricted from these areas based upon topography (e.g., cliff lines) and/or fences. Site specific barriers (e.g., fences) would be analyzed at the implementation level. The Proposed Plan includes acres unavailable to grazing and limited to trailing only that are currently grazed. The unavailable allocation would take effect once the ROD is signed, however, the BLM would need to undertake additional processes to modify permits or to construct fences if needed to prevent access, if necessary.
14767-53	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	There is nothing but bald, unsupported assertions that livestock grazing protects and restores the objects of the Monument. This is the very essence of arbitrary and capricious decision-making that is a violation of the Administrative Procedures Act. d. Science shall be integrated into management decisions concerning NLCS components in order to enhance land and resource stewardship and promote greater understanding of lands and resources through research and education. The alternatives and DRMP failed to implement science into the process. For instance, the alternatives and DRPM fail to implement the most basic range management science, such as utilization rates or stocking determinations. Further, the common to all alternatives fails to provide any implementation of current science regarding biological soil crust. Again, the BLM fails to comply with its own direction.	DATA02-Inadequate Methodologies	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in Chapter 2, Livestock Grazing, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
14767-131	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	At 2.1.5, the EIS states: Areas selected for limiting or discontinuing discretionary uses were determined by evaluation of available data that informed the overall ecological condition of the landscape and known objects at risk (e.g., susceptibility of perennial water to degradation) across multiple lines of evidence. The EIS fails to provide this evaluation or even cite to it. NEPA is a disclosure document and this is the heart of the question to be answered, what uses (and how they are managed) are compatible with the protection and restoration of all objects. While, of course the answer to this question is inconvenient for the BLM to honestly answer, NEPA compliance demands this.	DATA02-Inadequate Methodologies	Chapter 2, Description of the Alternatives Analyzed in this Proposed Resource Management Plan and Final Environmental Impact Statement, the section on Alternative D lists the data types used, including but not limited to AIM data, trend data, state and federal water quality data. See Appendix K for an overview of the AIM data and methodology used in the RMP/EIS.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-140	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	At 2.4.2.2: Agencies would collaborate with the BEC and Tribal Nations when developing stipulations for discretionary actions including, but not limited to, seed and plant collection and permitted activities, as consistent with federal law and regulations. But the primary purpose of an RMP is to do just that, not promise to do it at some undefined future. You can't analyze the impact of actions or the effectiveness of stipulations if you have not even bothered to create them. Lets examine this from the perspective of the discretionary use of livestock grazing. What are the stipulations set for livestock grazing? What would be the trigger for implementation (on ROD signing, or likely never during permit NEPA due to FLPMA 402c2 addition)? What is the scientific research on the effectiveness of the stipulations? None of these basic questions were asked or answered. This, like much of the DRMP is act now, think later, maybe. Not only does this violate NEPAs hard look requirement, it also ignores nearly all of BLMs directives on RMP development.	DATA02-Inadequate Methodologies	Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Section titled Tribal Co-Stewardship provides management actions for tribal co-stewardship, to ensure enhanced Tribal Nation engagement and collaboration in the management of BENM. Specific management actions for seed gathering and plant collection can be found in Chapter 2 in sections titled “Vegetation” and “Livestock Grazing”.
18923-5			The BLM should seek to collaborate with the tribes to apply the scienfic method to their cultural praces that may influence changes in the landscape, but it is premature to guide management of this landscape for the next 30+ years by way of indigenous knowledge not yet tested by the rigors of the scienfic method which is to include the scruny of peer-review.	DATA02-Inadequate Methodologies	The planning effort utilizes Traditional Indigenous Knowledge sources of information to reflect the traditional and historical knowledge of Tribal Nations as directed in Proclamation 10285. Please see Section titled Traditional Indigenous Knowledge and the Bears Ears Landscape of the Draft RMP/EIS for further discussion of the use of Traditional Indigenous Knowledge.
916-14	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	The agency should adequately consider that sound decisions cannot be made without sufficient data and analysis of the entire spectrum of issues so that all significant causes and effects are adequately identified and evaluated. [see letter for further detail and rationale]	DATA02-Inadequate Methodologies	As stated in Section titled Availability of Data and Incomplete Information, the agencies used the best available science in the preparation of the analysis in the Proposed RMP/EIS. Where quantitative or location-specific data was not available, qualitative data was used. The issues analyzed in the Proposed RMP/EIS are outlined in Section titled “Issues Considered” in Chapter 1.
18987-2			Additionally, the ambiguity of but are not limited to is extremely concerning and should be removed. There is no methodology or analysis to allow the agencies to select what activities will be banned at their discretion. This is a blanket statement and could include other activities that would not have been properly analyzed and would likely have significant adverse effects. Please do not select this statement from Alternative E in the final plan.	DATA02-Inadequate Methodologies, ALT05-Alternative E, REC01-General	The agencies would follow applicable law and conduct analysis and involve the public, consistent with federal law, when considering closures of public lands. See the Proposed Plan under the section titled Recreation Use and Visitor Service, for clarification to the language around rest and closures.
18112-23	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	The Aquifer Protection ACEC Unreasonably Harms Blanding City. Under the Federal Land Policy and Management Act (FLPMA), the Bureau must prioritize and protect areas of critical environmental concern (ACECs). 43 U.S.C. 1712(c)(3). Blanding City understands that. But the Bureaus proposal to take away Blanding Citys ability to serve its constituents water needs through a proposed Aquifer Protection ACEC is unreasonable and must be reconsidered. As a preliminary consideration, the Bureaus ever-expanding use of ACECs across other recent resource-management plans shows that the current Bureau has launched an anti-use attack on local communities rather than implement Congress multiple-use requirement. Here, for example, the Bureaus preferred Alternative E, would designate more ACECs than the other alternatives. Draft Plan ES-16. Local stakeholders unheard concerns surrounding ACEC designation are not new, and the injury felt by the public as a direct result will be longstanding as ACEC designations tend to be rigid in practice and arent often undesignated. See Karin P. Sheldon & Pamela Balwin, Areas of Critical Environmental Concern: FLPMA's Unfulfilled Conservation Mandate, 28:1 Colo. Nat. Resources, Energy & Env'tl. L. Rev. 1, 32 (2017) (analysis of then-current BLM planning regulations). Turning to the proposed revisions, in preferred Alternative E, the Bureau would designate a new Aquifer Protection ACEC. E.g., Draft Plan 3-182. This ACEC would cover[] almost all BLM-administered lands within the boundaries of the plan area, and incorporate[] all aquifers and aquifer systems serving as primary drinking water sources for communities near [Bears Ears], including . . . Blanding. Id. at 3-187 (describing Alternative D but similarly applicable to Alternative E, as explained at 3-189). The designation would result in the imposition of draconian anti-use restrictions on Blanding City, preventing it from using its water resources to serve its constituents. The Blanding Municipal Watershed lies partially within the Planning Area. Draft Plan 3-70. Blanding City has voiced its concerns about the proposed ACEC designations at the hosted town hall meetings but were told the ACEC designations would only benefit their water quality, long term. Blanding City pointed out that if certain areas were to be designated as ACECs, then such designations would make it very difficult, if not impossible, for them to conduct repairs to pipelines and other vital city infrastructure that may rest within the planning area. The draft plan itself concedes to this point, Specifically, under Alternative A and B, 38% of BENM lands would be managed as VRM Class I, meaning that only negligible and natural process changes to landscape would be allowed. Under Alternative E, the BLM would manage all lands as VRM Class I or II, with almost 98% managed as VRM Class I Alternative A would allow for the most acres to be managed as VRM Class III (20%), where projects could modify the landscape character such that changes could attract the attention of the casual observer, whereas Alternative E would not allow any lands to be managed to these objectives. Draft Plan ES-18. This shows that even slight modification to the visual value would be enough to result in a swathe of repercussions that Blanding City would then have to account for under the Bureaus preferred Alternative E. This sort of disregard for the thoughts of the affected community shows the Bureaus disregard for the practical impacts on local stakeholders. Counterintuitively, the Bureau also states: under Alternative A, the Aquifer Protection ACEC would not be designated . . . however, proposed management action under other resources would provide similar protection to the relevant and important values identified for the ACEC As a result, not designating the Aquifer Protection ACEC would be unlikely to have meaningful impacts to the resources located there. Draft	DATA02-Inadequate Methodologies, ALT07-Modification of Existing Alternatives, WAT01-General	See the Section titled Special Designations in Chapter 2 of the Proposed Plan for ACEC designations. The Proposed Plan would designate the 85,856-acre Aquifer Protection ACEC. Special management associated with the ACEC is provided in Chapter 2 Special Designations, and was developed to protect the relevant and important values identified in the ACEC, including Natural System/Aquifer Recharge, Scenic, Cultural, and Paleontological. Under the Proposed Plan, the Aquifer Protection ACEC is a little over 6% of BENM. The analysis in Chapter 3 was clarified that the Aquifer Protection ACEC could provide further protections. VRM Management in the Proposed Plan would designate fewer acres as VRM Class I, providing more flexibility for maintenance of water equipment. Moreover, according to the Blanding City Water Conservation Plan updated 01/2021, there are no water rights owned by Blanding City in the ACEC, and according to the Blanding City Water Source & Reservoir Configuration in this document, there are no water sources that serve Blanding within the ACEC.

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			Plan 3-182. So why bother? The BLM answers this question in their explanation under Alternative E, management of the Aquifer Protection ACEC would be the same as under Alternative D and would therefore have the same management implications as Alternative D . . . [t]his management would largely preclude viewshed-disrupting development in these areas of the ACEC, preserving its scenic relevant and important value. Draft Plan 3-189. This only bolsters Blanding Citys concerns that if they have equipment in the area that may need repair or maintenance, they very well could be subject to the repercussions of disturbing the ACEC if they send workers out to address the issue. The Bureau does not provide information supporting their response to Blanding City that the Aquifer Protection ACEC would improve the watershed. If anything, the proposal shows that there would be no real benefit to designation other than supporting scenic views to the detriment of Blanding City and its constituents. Considering the potential harms to Blanding City, this cannot stand.		
967-1	Matt Draper, UT		These airstrips are in an area of the nation prone to unpredictable weather and air currents. Aviation traffic that has the potential to use these airstrips need to have options available to them not only for recreational use, but also emergency use during times when bad weather or air currents cause emergency situations. This does not apply specifically to air traffic that has the intentions of landing in the area. It has broad implications for any traffic flying through the area that may have needs that require the traffic to land, even if for a very brief and temporary period of time. To close these airstrips removes many pilot's abilities to get safely on the ground under circumstances that prevent them from staying in the air. The two fields being chosen to remain open are not enough to cover the possibilities of what could happen. Pilots should have options and not be limited by groups trying to remove all human presence from the area aside from the elite few who meet the criteria to stay. The lives of individuals in the air are not worth the sense of satisfaction of those on the ground. So please, abort this plan of closing airstrips until enough of a study has been accomplished to not only identify what airstrips don't meet the agreed upon criteria to remain open, but also identify what airstrips could provide a safe harbor for pilots who could easily find themselves in trouble flying through the area.	DATA02-Inadequate Methodologies, ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and the Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on NFS lands. Impacts of aircraft on the natural environment are discussed in the Travel, Transportation, and Access Management section of Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
9524-5	379 Ridge View Drive Grand Junction, CO 81507;Sherry Schenk		I am concerned that climate change impacts across the Monument are not fully acknowledged in the draft document and I believe that Traditional Ecological Knowledge could be expanded in the plan to be used to address climate change impacts when needed.	DATA02-Inadequate Methodologies, CC01-General	Chapter 3, section titled “Climate Change” discusses impacts of management actions on climate change. The planning effort utilizes Traditional Indigenous Knowledge sources of information to reflect the traditional and historical knowledge of Tribal Nations as directed in Proclamation 10285. Please see Section titled “Traditional Indigenous Knowledge and the Bears Ears Landscape” of the Draft RMP/EIS for further discussion of the use of Traditional Indigenous Knowledge.
15381-16	Sagebrush Habitat Conservation Fund		3.5.2.2.2. Impacts Common to All Alternatives (Archaeology Sites) Livestock Grazing It is hardly meaningful analysis to point out grazing impacts are more likely to occur in areas where there is grazing. Adverse effects to cultural sites are identified, and the source of those adverse effects are attributed in the site recording and monitoring. A finding of adverse effect should trigger part 106 consultation to identify mitigation. At the very least, the activity causing adverse effects should be removed pending site mitigation. If livestock are causing an adverse effect, grazing must be curtailed to prevent further damage at least until mitigation is implemented. This should be the case for any discretionary activity permitted by BLM. We have seen direct livestock damage to archaeological sites caused by trailing, trampling, manure accumulation, and rubbing on structural features within Bears Ears. Indirect impacts occur through livestock related accelerated erosion. Archaeological sites are Monument objects that BLM must protect under the Proclamation and NHPA. Accepting and merely cataloguing loss and damage is not acceptable.	DATA02-Inadequate Methodologies, CUL01-General, GRAZ01-General	The agencies are required to conduct implementation level analysis, which will include Section 106 consultation and compliance for grazing allotment renewals as well as other discretionary actions for grazing. The agencies are conducting Section 106 consultation and compliance for the plan and evaluating affects to historic properties from management actions in the plan.
12746-34	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The Proposals lack of integration of impacts of changes in management between expected current recreational usage and resources provided to users of the Planning area after implementation has directly impacted the very limited range of alternatives provided in the Proposal. This range of alternatives is even more unacceptable as recreation and economics being identified as priority issues in the Proclamation. Even the most development intensive alternative provided in the Proposal fails to provide any meaningful guidance for the developing and utilizing recreational opportunities in the planning area. The failure to tie proposed changes in the Alternatives of the Proposal to the impacts desired outcomes after implementation has resulted in a Plan being provided for public comment that has many viable options for management not being explored. The Organizations believe these analysis flaws have resulted in a range of Alternatives being presented that simply bear no rational relationship to the planned usage or benefits that are currently accruing to the local communities from the recreational usage of the BENM or possible impacts to these communities from these changes. Providing an accurate and reasonable range of alternatives to the public as part of the NEPA process is a critical component of the NEPA process. The rational decision-making process of NEPA is compromised when agencies consider only a limited range of alternatives to their proposed projects.	DATA02-Inadequate Methodologies, DECIO7-Compliance with other laws and policies, REC01-General	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. The agencies have assessed economic impacts of recreation in Environmental Justice and Social and Economic Values in Chapter 3.

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18082-14	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The BLMs Conservation and Landscape Health Rule became effective June 10, 2024.10 This rule establishes policy to protect the most intact, functioning landscapes; restore degraded habitat and ecosystems; and use science and data as the foundation for management decisions across all plans and programs. We recommend that the Final EIS demonstrate how the chosen alternative is consistent with this rule.	DATA02-Inadequate Methodologies, DECI07-Compliance with other laws and policies	The BLMs Conservation and Landscape Health Rule became effective on June 10, 2024. This plan is consistent to the extent practicable.
12746-23	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	As the Organizations have noted in previous sections of these comments, we have concerns about the accuracy of the social surplus component of the economic analysis provided in the Proposal. The Organizations must question why this type of information was provided or sought out when the conclusions of the basic economic analysis are simply lacking factual basis in any manner. As noted the Proclamation clearly states economic contributions are an important planning factor and makes no mention at all regarding concepts such as surplus economic values not captured in various uses. The concepts of economic contributions and surplus economic value are two entirely separate concept for economic analysis with very little overlap.	DATA02-Inadequate Methodologies, EJSOC01-General	Total economic value is the combination of all benefits people receive from BLM-administered lands and resources. Total economic value is the sum of the market value from economic activities and the nonmarket value. This discussion was added to the Environmental Justice and Social and Economic Values section to clarify. Nonmarket values are unable to be quantified; however, consumer surplus can be used as an estimate of some of the nonmarket values for individuals. The discussion on consumer surplus was provided to highlight the value that recreation provides under all alternatives, but the discussion on consumer surplus was not analyzed under the impacts by alternative, due to the difficulty of quantifying consumer surplus. Therefore, the discussion on consumer surplus was revised so that it is discussed qualitatively, rather than quantitatively, and the Estimates of the Average Consumer Surplus of Recreation Benefits for the Intermountain Region, per Person per Primary Activity Day table, was removed.
18803-5	Shane Shumway Blanding, UT 84511		Within the DEIS there is not a thorough analysis on the amount of people who rely on wood burning stoves to heat their homes, and the cost of heating their homes through another form if these restrictions are imposed. This needs to be included before any decision is made.	DATA02-Inadequate Methodologies, EJSOC01-General	Discussion on impacts on individuals who rely on wood product harvesting for heating sources and other uses are included in the Environmental Justice and Social and Economic Values in Chapter 3.
12746-24	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	As previously noted in these comments, economic contributions from recreation are identified as an important factor to be addressed in subsequent planning in the Proclamation. Many of these activity-based estimates used in the Proclamation are so low they render it impossible for the average visitor to achieve their desired opportunity with funds at the level asserted to be average. In isolation, this is a major concern. When the planning efforts that have occurred on the monument at the same time as the Proposal are reviewed the conflicts in conclusions become unresolvable.	DATA02-Inadequate Methodologies, EJSOC01-General, REC01-General	The estimates used in this analysis represent the best currently available data.
12746-26	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	The Organizations have extensive experiences with the difference between an asserted social economic value and the desire to actually convert this surplus economic social value into a monetary value and an economic contribution that can be used for management and maintenance of the resource. With the eroding budgets of USFS and BLM federally for basic operations, our members have started to be engaged by various states and other interests on how to replicate the OHV registration program that has become highly effective in Utah and other states. The desire has been to create similar programs for hiking, biking, camping and other uses. To date the motorized recreational community continues to be the only non-consumptive user group of public lands that have adopted the pay to play model. Many other user groups have been openly hostile to the concept of monetizing this type of surplus economic value for the benefit of public lands. This makes our members question any asserted surplus value from opportunities on public lands, especially since the surplus value is asserted to be many times more than any registration or permit would cost annually. Through these efforts we have found that other interests who assert the highest consumer surplus in their opportunity are also the least willing to pay anything. The Proposal asserts that there is an average consumer surplus of value estimated to be \$77.04 per person.47 Our concern with this estimate is the fact that if the excess value was anywhere near this assertion in terms of dollars our requests for a 20 or \$30 annual registration to support these opportunities should be an easy sell. To date we have not seen any interest in any level of support despite some highly detailed meetings. This causes us concern about the value of these efforts and calculations. While the calculation of this surplus economic value may be an interesting academic effort, these surpluses cannot hire staff, empty trash, grade roads or support basic operations in adjacent counties. Again, we must question why this would be included as it is not required in the Proclamation, and it has been our experience that these estimates are not able to be converted into an actual economic contribution.	DATA02-Inadequate Methodologies, EJSOC01-General, REC01-General	Total economic value is the combination of all benefits people receive from BLM-administered lands and resources. Total economic value is the sum of the market value from economic activities and the nonmarket value. This discussion was added to the Environmental Justice and Social and Economic Values section to clarify. Nonmarket values are unable to be quantified; however, consumer surplus can be used as an estimate of some of the nonmarket values for individuals. The discussion on consumer surplus was provided to highlight the value that recreation provides under all alternatives, but the discussion on consumer surplus was not analyzed under the impacts by alternative, due to the difficulty of quantifying consumer surplus. Therefore, the discussion on consumer surplus was revised so that it is discussed qualitatively, rather than quantitatively, and the Estimates of the Average Consumer Surplus of Recreation Benefits for the Intermountain Region, per Person per Primary Activity Day table, was removed.
10626-28	Debra Van Putten		What I did see was a lot of families spending time together, and very importantly, kids spending outside with physical activity and not on phones. (Exhibit I) I saw older couples exploring and enjoying themselves. I dont see any meaningful discussion of these benefits in the EIS.	DATA02-Inadequate Methodologies, EJSOC04-Nonmarket (a sense of place and cultural identification)	Discussion on nonmarket values of open spaces, such as those in the comment, are included in the Proposed Plan Environmental Justice and Social and Economic Values in Chapter 3. For example, a discussion on the willingness to pay for benefits received through spending time in open spaces, such as increased physical health and reduced potential health costs from exercise as well as increased enjoyment and quality-of-life, is provided.
9189-13	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The RMP allows wood harvest on up to 68% of the BENM. Wood cant be harvested without traveling to the place of harvest. This implies roads, trails, ohv and pickups going cross country. All these activities disturb the soil, break up soil crusts and accelerate erosion. This must be analyzed and reported with areas designated so it is not a free-for-all.	DATA02-Inadequate Methodologies, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Proposed Plan in the Forestry and Woodlands Section would allow wood product harvest on 859,983 acres of BENM in accordance with applicable law. The Forestry and Woodlands analysis (see Chapter 3, Forestry and Woodlands, Environmental Consequences) evaluate impacts of OHV as it relates to wood product harvest.

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17573-53	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Typically, AUMs on federal land are calculated and allocated by BLM/USFS Range Conservationists on an allotment-by-allotment basis. This mirrors rangeland management practices by private land managers where AUMs, and correlating stock rates/stocking densities are calculated on a pasture-by-pasture basis as well. The States first concern here is that as part of the current BENM RMP-EIS process the BLM has castaway this decades old range management practice and instead of allocating AUMs on an allotment-by-allotment basis using best available rangeland health data, the BLM is retiring large areas of allotments without properly identifying a need. By doing so, the BLM has disregarded the localized land-use decisions needed to properly care for the range health of each individual allotment.	DATA02-Inadequate Methodologies, GRAZ01-General	The Proposed Plan would not alter currently allocated AUMs as outlined in Chapter 2, Livestock Grazing. Modifications to AUMs would be done at the site-specific implementation level planning process.
14767-103	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Further underscoring the need to properly determine available forage is the fact that the current permit allocations were set more half a century ago, back when high levels of utilization were considered fine. In addition, livestock weights have dramatically increased over this time period, resulting in the removal of significantly more forage by the same number of livestock. We attach Carter, 2008 for details on this issue. In summarizing the issue, Carter states: Applying this to the current weight of 1,680 pounds for a cow/calf pair, the daily forage consumption would be 50.4 lbs of air-dry forage per day, or for a month (30.4 days), 1532 pounds of forage per AUM. When the permits were issued, the BLM was using 790 lbs. of forage per AUM, yet current consumption is approximately twice that. So, in other words, the current permits result in the removal of approximately twice the total biomass than occurred when the AUM allocation was set in the mid twentieth century. Clearly, the BLM must apply NLCS requirements to permit AUM allocations. The continued failure to do so would render this process arbitrary and irrational.	DATA02-Inadequate Methodologies, GRAZ01-General	The Proposed Plan would not alter currently allocated AUMs as outlined in Chapter 2 Livestock Grazing. The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined in Chapter 2, Livestock Grazing. Livestock management can be adjusted as necessary to meet these objectives for rangeland health. The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
14767-106	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	While the BLM has demonstrated a deep, purposeful ignorance of the ecosystem covered under the RMP, we again refer you to RMRS GTR-169 which we have provided to you previous but was ignored, which states the same scientific conclusion as Mack and Thompson that this ecosystem did not evolve with large herbivores and is incapable of withstanding the impacts of large herbivores and remaining functional. The basic incompatibility of livestock grazing with the ecosystems of the arid west must be fully acknowledged and the final decision must deal with this fact. The EIS and RMP can not ignore this foundational issue and be legally compliant.	DATA02-Inadequate Methodologies, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
14767-110	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The BLM incorrectly and facetiously assumes that all permits will be subject to terms and conditions but this is not correct. Livestock grazing permits on BENM have, for the most part, never undergone NEPA analysis in the more than half century since the law was passed.	DATA02-Inadequate Methodologies, GRAZ01-General	All BLM permits include the following stipulation: Grazing management practices will comply with Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah (1997). In Chapter 2, Livestock Grazing, the Proposed Plan identifies priority allotments for which the BLM will complete land health assessments, and, if needed, causal factor determinations. The BLM will then complete appropriate NEPA and Section 106 compliance and consultation to renew such permits. Additionally, the BLM has created a schedule for all allotments within BENM to fully process permit renewals.
14767-113	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Speaking of regulations, 43 C.F.R. 4130.3-1(a) requires that "authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment." The regulations define livestock carrying capacity as the maximum stocking rate possible without inducing damage to vegetation or related resources. 43 C.F.R. 4100.0-5 (emphasis added). Yet the AMS provides no information regarding livestock carrying capacity. It simply continues a determination made more than half a century ago. The BLM has not the foggiest idea if the AUMs it proposed to authorize for livestock exist today.	DATA02-Inadequate Methodologies, GRAZ01-General	The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined in Chapter 2, Livestock Grazing. Livestock management can be adjusted as necessary to meet these objectives for rangeland health.
14767-135	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Lets examine The BLMs own data, the most recent comprehensive condition data located in the San Juan Resource Management Plan 1991. Below are the percentages of the allotment in POOR or FAIR condition (a loss of >50% of the plant community) and the percent rock (ungrazable so can not be degraded). In the far right column is the % in 76-100% of potential, the appropriate condition to protect and restore Monument objects: Allotment Name % POOR + FAIR ROCK Total % POOR + FAIR + Rock 76-100% of potential Comb Wash 58% 17% 75% 3% Cottonwood 76% 15% 91% 0% Harts Draw 51% 30% 81% 2% Harts Point 66% 34% 100% 0% Hurrah Pass 44% 30% 74% 8% Indian Creek 59% 24% 83% 3% Lake Canyon 27% 38% 65% 11% Lone Cedar 67% 33% 100% 0% Perkins 23% 7% 30% 17% Slickhorn 58% 7% 65% 9% Tank Bench 39% 21% 60% 14% Tank Draw 91% 9% 100% 0% Texas Muley 85% 9% 94% 2% White Canyon 35% 15% 50% 15% White Mesa 61% 11% 72% 3% We provide the original document for your reference. What should be obvious from this most recent quantitative vegetative condition data is that the vast majority of the grazable acres are in severely degraded conditions, far below the level needed to protect and restore the objects. The management that resulted in these severely degraded conditions is nearly identical to those in place today and nearly identical to those the BLM proposes to continue into the future. Again, on what rational basis the BLM determined that, miraculously, that all this degradation evaporated into thin air and that continuing the same management as caused this degradation would lead to restoration of the objects beggar credulity. But the BLM simply chose to hide its review in its attempt to avoid examination. NEPA does not allow this.	DATA02-Inadequate Methodologies, GRAZ01-General	The BLM used the best available science and up to date BLM data to develop the Proposed Plan. Chapter 3, Livestock Grazing, discusses use of AIM data and trend studies for livestock grazing management. The Proposed Plan includes North Cottonwood and Upper North Cottonwood as limited to trailing only, and John's Canyon of Perkins South as unavailable to grazing. The Proposed Plan in Chapter 2, Livestock Grazing, outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-139	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The EIS mentions Traditional Indigenous Knowledge as a foundation for management of the BENM under the DRMP but fails to define what this is and how it would affect management and impacts. This seems similar to the issue of relying on undefined BMPs which the agency has lost many court cases on. You can't analyze the impacts of implementing actions when you dont know what those actions are. At 2.4.2.1 we see the assertion that: All actions in BENM would be consistent with Proclamations 9558 and 10285 and the protection of BENM objects. But as we have laid out above and will further elaborate below, livestock grazing is an action and is not consistent with the protection of BENM objects, let alone the much higher bar, purposefully ignored by the BLM, that to recover objects. The EIS provides no rational support for its conclusory assertion that livestock grazing as proposed (basically the status quo over the last half century) would protect and restore all objects.	DATA02-Inadequate Methodologies, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Chapter 2, Livestock Grazing, states livestock management actions will include collaboration with the BEC, which includes incorporation of Traditional Indigenous Knowledge. The section titled, Traditional Indigenous Knowledge and the Bears Ears Landscape, discusses Traditional Indigenous Knowledge and the Bears Ears Landscape. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
14767-217	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The other issue ignored in the AMS and the EIS and RMP is the fact that the BLM no longer does NEPA for permit renewals and instead rubberstamps permits decade after decade under FLPMA 402c2. One of the critical elements of the proposed RMP will be implementation of all grazing related requirements upon signing of the ROD. If that does not happen everything related to livestock impacts is entirely meaningless because it will never be implemented.	DATA02-Inadequate Methodologies, GRAZ01-General	Chapter 2, Livestock Grazing, in the Proposed Plan identifies 7 priority allotments for which the BLM will complete land health assessments, and, if needed, causal factor determinations. The BLM will then complete appropriate NEPA and Section 106 compliance and consultation to renew such permits. Additionally, the BLM has created a schedule for all allotments within BENM to fully process permit renewals.
9189-4	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Livestock trample the soil, remove soil covering and stabilizing vegetation in upland and riparian areas. They destroy biological crusts, pollute the springs and streams, litter areas with manure, and damage cultural and archeological resources.1 These all detract from and heavily damage the objects, visual aesthetics and natural values at issue in the RMP. The soils in BENM are highly erodible and require biological crusts and plants to stabilize them. We see that the RMP has determined, apparently without any systematic or scientific analysis, that 70 - 90 percent of BENM is suitable for livestock. What we dont see in this RMP is a determination of current forage capacity for livestock and wildlife or the setting of stocking rates using adequate rest and todays forage consumption rates. I reviewed the forage consumption rates for cattle and sheep in a 2016 white paper.2 That review pointed out that an AUM consisting of a cow and calf would consume 3% of their body weight per day, which applied to current weight of 1,680 pounds would result in forage consumption of 1,532 pounds of air dry forage per month, while agencies are currently allocating 790 lbs/month. An AUM for domestic sheep consists of five ewes plus their lambs. My review determined with current weights, an AUM of domestic sheep consumes 1,976 pounds per month, again grossly exceeding the current allocations.	DATA02-Inadequate Methodologies, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. The Proposed Plan in Chapter 2, Livestock Grazing, outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. Chapter 2, Livestock Grazing and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
9189-9	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	I analyzed the soil survey for Grand Staircase Escalante National Monument to provide input to their proposed Livestock Grazing Plan Amendment. 7 That analysis relied upon the Soil Survey and current science on livestock impacts to soils and water with an emphasis on biological crusts and erosion limitations. The Soil Survey acknowledged historic overuse by livestock and the accompanying loss of production. I summarized the capability classes in the soil survey showing that 6 of 8 classes are not suitable for grazing; wind erodibility excludes coarse sands, loamy fine sands, and very fine sands which are not suitable. In those comments, I also included reference to BLM policy on livestock grazing as well as the Soil Survey. Once the lands available for livestock grazing are identified and delineated on maps, the BLM Land Use Planning Manual (Appendix C II B p. 14) states: identify on an areawide basis both the amount of existing forage available for livestock (expressed in animal unit months) and the future anticipated amount of forage available for livestock with full implementation of the land use plan while maintaining a thriving natural ecological balance and multiple-use relationships. The Soil Survey (p. 174) states: The objective of range management is to manage all uses, including grazing, so that the plants growing on a site are about the same in kind and amount as the potential natural plant community for that site or a desired plant community, which is one of the sites potential vegetation states. Such management generally results in the optimum production of vegetation, control of undesirable plants, conservation of water, and control of erosion. These references illustrate the elements the RMP should be addressing in regard to determining suitability, stocking rates, and management for livestock grazing. We also dont see any analysis of the potential of these plant and soil communities. They should be dominated by soil crusts. What is needed is an analysis of long term livestock excluded areas such as Canyonlands National Park compared to conditions in BENM as well as analysis of soil survey data.	DATA02-Inadequate Methodologies, GRAZ01-General	The BLM used the best available science and up to date BLM data to develop the Proposed Plan. The Proposed Plan in Chapter 2, Livestock Grazing, outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
14767-184	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.2.1.1: The USGS has recorded at least seven multiyear droughts in Utah since 1896 (USGS 2003), and droughts are becoming increasingly common and more severe than in the past (Littell et al. 2016; Seager et al. 2007). Trends in the soil water balance over time have shown a greater water deficit within the soil of topographically diverse environments (escarpments and mesa lands), which are generally associated with pinyon-juniper and/or shrubland vegetation (DAmore and Kane 2016). While the above statement is certainly true, the EIS entirely fails to examine its decision to continue authorizing essentially the same livestock AUMs and grazing management in light of this known information. How would the reduced vegetative productivity affect available AUMs? The BLM fails to answer this foundational question.	DATA02-Inadequate Methodologies, HABVEG01-Vegetation	In the Proposed Plan, the agencies will develop a Drought Management Plan (see Chapter 2, Livestock Grazing). The Goals and Objectives of the Livestock Grazing Section says that the agencies will implement livestock grazing management practices to meet standards for rangeland health. Chapter 2, Livestock Grazing, outlines that rangeland conditions will be monitored, including during periods of drought.

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916-5	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Avoid Over-Representing the Publics Need for More Wilderness [see letter for further detail and rationale]	DATA02-Inadequate Methodologies, LWC01-General	See Chapter 2 sections titled Lands with Wilderness Characteristics (applies to BLM-administered lands only) and 2.4.10. Special Designations of the Proposed Plan for lands with wilderness characteristics, wilderness study area, and designation wilderness management actions. See Chapter 3 Sections Lands with Wilderness Characteristics and Wilderness Study Areas for a discussion of impacts from management actions regarding lands with wilderness characteristics and wilderness study areas.
889-76	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The primary rationale stated in the DEIS for prohibiting launching and landing drones across the entire monument in alternatives C, D, and E is preserving natural soundscapes. Yet a prohibition on drones would do little to accomplish this goal, particularly when one considers other more impactful activities that would continue to be allowed in the same areas under the proposed management plan. The DEIS makes no attempt to quantify the alleged impacts of drone flying on natural soundscapes in the monument, nor does it provide any explanation for the inconsistency in banning quieter devices in areas where far noisier machines would still be allowed. The DEIS presents no factual findings regarding the frequency of drone use in the monument, nor are there any discussions of actual measurable noise levels attributable to drones. Instead the DEIS simply makes the repeated but completely unsupported assertion that drones impact natural soundscapes and therefore it is necessary to prohibit them. This does NOT satisfy the agencies legal burden under NEPA that decisions are supposed to be based on the best available science and that agencies must articulate a clear connection between the facts found and the decision made.	DATA02-Inadequate Methodologies, NOISE01-General, REC01-General	The agencies reviewed and added two documents discussing drone noise effects to wildlife to References: Three Considerations around Drone Noise and Strategies for Mitigation and Terrestrial Megafauna Response to Drone Noise Levels in Ex Situ Areas. The Affected Environment for Natural Soundscapes was updated to include impacts to wildlife from drone use as provided in the above documents.
16784-27	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP states, although specific goals, objectives, and management direction vary slightly between Alternative A and the action alternatives, many of the key elements are the same. This is untrue as the variation from A, which allows scientific collection and survey work, to all other alternatives represents a ban on research and work which is explicitly called out in the authorizing language of the Presidential Proclamations. The presidential proclamation states that the fossils of BENM provide important opportunities for further paleontological study (Presidential Proclamation 9558), and allow future paleontological exploration [that] will greatly expand our understanding of prehistoric life (Presidential Proclamation 10285).	DATA02-Inadequate Methodologies, PALEOGE003-Paleo	The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, the Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
16784-37	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP states: Additionally, the 2008 Monticello RMP requires a permit for the casting of fossils (specifically vertebrate paleontological resources and including some trace fossils). Although the 2020 ROD/MMPs does not provide guidance regarding the casting of paleontological resources, casting of paleontological resources would follow permit stipulations issued by the Authorized Officer (BLM)/Responsible Official (USDA Forest Service). As discussed above, the definition of casting needs to be refined in this document. To the best of our knowledge, the provision about casting in the Monticello RMP is unique, and without elaboration, it should not be transferred to the BENM MMP because it could have unintended consequences of hampering scientific studies of paleontological resources or inadvertently damaging them. SVP recommends that this paragraph be revised by BLM and USFS paleontologists and at very least amended to state casting of paleontological resources in the boundaries of BENM would fossil permit stipulations issued by the Authorized Officer and perhaps that Casting of fossils removed to approved repositories would follow the stipulations given in the repository agreement.	DATA02-Inadequate Methodologies, PALEOGE003-Paleo	The agencies have considered the proposed change. "In situ" has been added to the management action related to casting in Chapter 2 Paleontological Resources under the Proposed Plan.
18987-5			This proposed action in Alternative E is not clearly defined and is ambiguous and therefore not analyzed properly. The term canyons is not defined anywhere else in the document and could be interpreted in many different ways and construed to apply to numerous geographical areas. Alternative E warrants more specificity on the geographic area to be sufficiently analyzed before implementing a permit system that would have significant adverse effects of limiting recreation access.	DATA02-Inadequate Methodologies, PALEOGE004-Geology, ALT05-Alternative E	Under the Proposed Plan in the Chapter 2 Recreation and Visitor Services section, permits would be required as specified under Management Areas and Sub-Areas.
916-12	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Provide Adequate Coordination with Local and State Government	DATA02-Inadequate Methodologies, PUBL07-Importance of Local Input	Appendix O, Consultation and Coordination, describes the coordination efforts for this RMP/EIS with local and State government.
916-16	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Motorized recreationists need trail opportunities similar the abundant hiking and mountain bike trail systems. The purpose and need process circumvented identifying and addressing this critical issue. [see letter for further detail and rationale]	DATA02-Inadequate Methodologies, PURNE01-Purpose and Need, TRAVEL01-General	The Purpose and Need of the Draft RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape." Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18657-54	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Moreover, the motorized route network in the monument is what enables all other recreational activities to take place. Most of the monument is highly remote, and many areas can be accessed only by primitive four-wheel-drive roads. Driving these roads is in itself a valued recreational experience for many people, while others use them to access hiking trailheads, climbing sites, campsites, or archaeological and cultural sites. A robust motorized route network is key to enabling all forms of recreation, whether those participating in a given activity appreciate that or not. Despite this fact, there is no recognition in the DEIS of any positive impacts of the motorized route network in Bears Ears National Monument. Every mention of motorized routes and OHV use is negative, and motorized access is treated throughout the document as a threat to monument values or as a nuisance to be eliminated. Alternative D in particular would designate the vast majority of the monument as OHV closed in favor of managing for so-called wilderness characteristics, attempting to manufacture wilderness suitability by the mass closure of existing roads. This is utterly unacceptable. Any objective evaluation of motorized use in Bears Ears must recognize the positive aspects of motorized access as well as the negative impacts, which the agencies have not done. Such blatant bias against motorized recreation must not be allowed to form the basis of the new Bears Ears management plan.	DATA02-Inadequate Methodologies, REC01-General	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. The range of alternatives developed by the agencies adequately analyzes the impacts of OHV use on Monument objects while recognizing the widespread use of OHV on BENM. Travel management planning will be completed as an implementation-level action, at which time specific routes will be designated.
889-74	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We strongly oppose any additional restrictions on flying drones within the monument beyond those in the 2020 management plans. Additional restrictions on drones are utterly unwarranted and would likely be unenforceable in any event. We note that while there are numerous mentions of drones in the DEIS claiming that they negatively impact natural soundscapes (which appears to be the primary motivation for prohibiting them) yet no attempt is made to quantify this impact in either a numerical or qualitative sense. There is no acknowledgement of the fact that most drones are extremely quiet and are largely inaudible more than a few hundred feet away, and such sounds that they do make are highly ephemeral, typically lasting no more than 20 - 30 minutes. The agencies also provide no analysis justifying why drones should be prohibited in the same areas where far noisier motor vehicles are still allowed, thus rendering the proposed ban on drones within the monument the epitome of arbitrary and capricious. We urge the incorporation of alternative As stance on drones into the final management plan, or most alternatives Bs actions.	DATA02-Inadequate Methodologies, REC01-General	Drone use in airspace is managed by the Federal Aviation Administration Civil Operations Part 107. However, the agencies have the authority to manage the casual use landing or taking off of drones on BLM- and NFS lands. Additionally, the agencies have the discretion to dictate all aspects of drone use if that drone is being used as part of a permitted activity. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion. Restrictions of drone use in the Proposed Plan for the purpose of protecting BENM objects is consistent with applicable law.
18987-1			Alternative E on the chart states: Prohibited activities include, but are not limited to, paragliding, hang gliding, base jumping, wingsuit flying, geocaching, and rock stacking. These are inappropriate activities in the Bears Ears cultural landscape according to Tribal expertise and Traditional Indigenous Knowledge. The ban on activities like this is very concerning and I can find no further analysis on this in the document aside from the text cited above. There is no methodology or analysis provided to explain why these are inappropriate activities. There is no analysis of the effects of banning these types of recreation.	DATA02-Inadequate Methodologies, REC01-General, ALT05-Alternative E	Very few visitors to the BENM region participate in most of these activities except for stacking rocks, otherwise known as cairning. Although creating cairns is a common activity on the landscape it can create a safety issue due to visitors getting lost. The agencies have documented impacts to cultural resources from rock stacking across the landscape.
18112-9	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	The Bureau also presents substantial changes to recreational shooting in the proposed revisions. Under the preferred Alternative E, [r]ecreational shooting activities would be prohibited in all areas of BENM. Draft Plan 3-431. Although the plan does state that [t]his prohibition does not apply to the use of firearms in the lawful pursuit of game[,] the prohibition makes no mention of the myriad of other forms of recreational shooting that include, but are not limited to, target shooting and long-range shooting. Simply put, it is not even clear that hunting will actually be allowed, or what will be banned as recreational shooting. In practice, the Bureau proposes that recreational shooting will be allowed in certain ways and areas if there are not any problems. But what constitutes a problem, and who actually says that there is a problem? Non-hunters who visit the area might outnumber the hunters and file complaints that could have the non-hunters define recreational shooting in any way that they want to including likely attempts to eliminate hunting altogether. Further, the proposal to broadly prohibit recreational shooting throughout the planning area does not appear to be based on any studies that present facts. The Bureau presents no numbers and admits that Alternative E does not use the BLM Recreation Planning Framework as described in H-8230-1 and is not addressed in-depth in this appendix. Instead, Alternative E creates four landscape-level zones in which standardized management would apply across the entire Monument. Draft Plan, App. E, E-4. To base such a sweeping prohibition of recreational shooting whatever that is on no finding of facts is unreasonable. Again, the Bureau is just guessing. But the Bureau must act reasonably when drafting resource-management plans and to do otherwise justifies setting the final Plan aside. See 5 U.S.C. 706(2).	DATA02-Inadequate Methodologies, REC01-General, SHOOT01-not in favor of shooting closures	Under the Proposed Plan, recreational shooting would be prohibited in BENM. See the Recreation Use and Visitor Services section of Chapter 3 for a discussion of impacts on recreational shooting closures on recreational users. Recreational shooting management intends to reduce user conflicts while protecting Monument objects. The agencies would continue to coordinate with the State of Utah on recreational uses. Recreational shooting is defined in the Glossary.
17252-4	Dallas Safari Club; Archery Trade Association; National Shooting Sports Foundation; Boone & Crockett Club; Congressional Sportsmen's Foundation; Delta Waterfowl; Wild Turkey Federation; National Rifle Association; Rocky Mountain Elk Foundation; Tom Allen 1959		Another significant flaw in the LUP/EIS is its references to textbook-like impacts of firearm discharge. Those references fail to make the case for closures. For example, under 3.5.7.2.7 of Alternative E - Impacts from Recreational Shooting, it states, Additionally, such management would provide environmental benefits by preventing noise pollution and lead fragments from bullets leaching into soils and waterways, protecting wildlife from lead poisoning (emphasis added) The LUP/EIS does not describe factors that would cause lead to leach into soils such as the soils being acidic in nature (uncommon in BENM) and high precipitation.	DATA02-Inadequate Methodologies, REC06-Shooting Sports/Hunting/Fishing	The agencies have added additional information and clarification in the Wildlife section of Chapter 3 in regards to lead poisoning associated with wildlife.

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	Stone Canyon Court Grand Junction, CO 81507;Association of Fish and Wildlife Agencies				
17252-5	Dallas Safari Club; Archery Trade Association; National Shooting Sports Foundation; Boone & Crockett Club; Congressional Sportsmen's Foundation; Delta Waterfowl; Wild Turkey Federation; National Rifle Association; Rocky Mountain Elk Foundation; Tom Allen 1959 Stone Canyon Court Grand Junction, CO 81507;Association of Fish and Wildlife Agencies		Equally egregious is the lack of scientific evidence to support the claim that dispersed recreational shooting is poisoning wildlife. There are no carcasses or gut piles to feed upon and the scattered lead particles from dispersed recreational shooting are unlikely to be a significantly detectable source for lead ingestion. Such an undocumented statement provides no scientific rationale for further closures in the BENM. In fact, it is irresponsible for the LUP/EIS to make such statements and to suggest to the public interested in the future management of the BENM that recreational shooting is having such an effect on wildlife.	DATA02-Inadequate Methodologies, REC06-Shooting Sports/Hunting/Fishing	The agencies have added additional information and clarification in the Wildlife section of Chapter 3 in regards to lead poisoning associated with wildlife.
14767-186	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.2.1.2, we see that 99% of the grazable acres within the Monument are highly or moderately susceptible to site degradation7 8 Yet the EIS failed to examine this issue when it rubber stamped status quo livestock grazing. How would livestock grazing protect and restore soils that are highly susceptible to degradation? The BLM planted its head deeply in its sand. NEPA does not allow for such ignorance. How does the continuation of livestock grazing on soils that are highly susceptible to degradation comply with the BLMs planning requirements that RMPs provide requirements and limitations to address each significant resource (in this case soils)(Appendix C)? The BLM fails to even provide a map, among the hundred or so in Vol II as to these soil properties and what the overlap with grazing allotments is.	DATA02-Inadequate Methodologies, SOILS01-General	See Chapter 3 Soils and Biological Crusts under impacts analysis for BSCs from livestock grazing. If monitoring indicates that domestic livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts in a manner that ensures protection of BENM objects. Chapter 2, Livestock Grazing, and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
14767-192	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Lets examine how the BLM has crafted its definition of surface disturbance to see if it has a rational basis in fact. Surface disturbance: Activities that normally result in more than negligible disturbance to public lands and that accelerate the natural erosive process. These activities normally involve use and/or occupancy of the surface, cause disturbance to soils and vegetation, and are usually caused by motorized or mechanical actions. Surface disturbance may result from activities using earth-moving equipment; off-road vehicle travel; the use of pyrotechnics and explosives; and construction of facilities like power lines, pipelines, recreation sites, livestock facilities, wildlife waters, or new roads. Surface disturbance is not normally caused by casual use. Activities that are not typically surface disturbing include proper livestock grazing, cross-country hiking, minimum-impact filming and vehicle travel on designated routes. Well firstly, what is proper livestock grazing and on what basis has the BLM come to the conclusion that it does not cause surface disturbance? The EIS is silent. No rational person with the slightest experience with the soils of BENM could come to the conclusion that livestock grazing does not cause soil disturbance.	DATA02-Inadequate Methodologies, SOILS01-General	The agencies considered the commentor's suggestions and provided changes to the surface disturbance definition in the Glossary.
14767-193	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Back to the definition: These activities normally involve use and/or occupancy of the surface, cause disturbance to soils and vegetation, and are usually caused by motorized or mechanical actions. Livestock use and occupy the surface. Check. Livestock cause disturbance to soils. Check. Livestock cause disturbance to vegetation. Check. Livestock cause mechanical actions to the soil surface from hoof impacts. Check. The BLM has no rational support for its conclusion that livestock cause no surface disturbance.	DATA02-Inadequate Methodologies, SOILS01-General	The agencies considered the commentor's suggestions and provided changes to the surface disturbance definition in the Glossary.
14767-18	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In AMS 5.4 we see the assumption BSC conditions can be derived from plot data generated by agencies and extrapolated spatially But this has not been done. The critical nature of BSC and their absolute incompatibility with continued livestock grazing have not been translated into quantitative planning criteria. Bowker and others have done extensive work on understanding BSC within the adjacent GSEN Monument. It would be very easy to determine the departure from potential. ESDs can not be used for this purpose as their understanding of BSC has no scientific basis. Most ESDs in the Monument list BSC potential as 1-5%, whereas the reality is on most soil types in the Monument BSC should be at or near 100% of available habitat (not rock, not basal and not under shrubs).	DATA02-Inadequate Methodologies, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	The Soil Resource section of the Proposed Plan states agencies would identify areas with BSCs and classify those crusts to best protect them. Additionally, Traditional Indigenous Knowledge and Tribal policies and guidelines, peer-reviewed literature based on the best available Western science, and best management practices would be applied to restore soil crusts. See Chapter 3 Soil Resource section under impacts analysis for BSCs from livestock grazing.
14767-198	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Construction of rangeland improvements would cause ground disturbance and potential compaction or displacement of soils, however, range improvements can also have an overall benefit to soil resources when they improve the distribution pattern of livestock grazing across a pasture or allotment (Holecheck et al. 2001), particularly if they result in livestock avoiding areas with sensitive soil types. Sensitive soil types, such as BSCs, would generally be more susceptible to physical impacts from livestock trampling or rangeland improvement construction activities than non-sensitive soil types. range improvements simply shift impacts from one place to another. They do not have an overall benefit. Sensitive soil types, as laid out in the EIS, cover 99% of the grazable acres of the	DATA02-Inadequate Methodologies, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	The Soils section of Chapter 3 was revised to clarify that range improvements can help reduce impacts to soils from livestock grazing.

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			Monument so it is impossible to avoid sensitive soil types under the BLMs proposal. But the EIS failed to examine this issue.		
14767-216	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The soil surveys do not contain information on the amounts or types of biological crusts that may occur in each soil map unit. No survey or inventory data has been collected specific to BSCs within the Planning Area and is not required for the BENM planning effort. There is now a vast amount of scientific literature on this topic with significant work having been done on the adjacent GSENM and Canyonlands National Park that can easily be applied here. The basic outcome is on most soil types, BSC naturally cover 75-100% of available habitat. As discussed in Mack and Thompson and other literature provided, this ecosystem did not evolve with and cannot withstand the impacts of large herbivores. This basic and absolute incompatibility must be directly addressed, but was strenuously avoided in the EIS. Currently on BENM, in areas accessible to livestock, the coverage is generally in the 1-3% range. Acres meeting, not meeting, and/or making progress toward meeting Standard 1 (upland soils) for rangeland health It must be that the BLM has not examined its rangeland health evaluation data. Large portions of the Monument have never been assessed since the 4180 regulations were put into force more than a quarter of a century ago. Most of the recent are one to two decades old. Most that have been done are superficial, do not comply with Manual H-4180-1 and do not implement current policy.	DATA02-Inadequate Methodologies, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	Literature was reviewed and relevant data regarding BSC coverage on soil types within BENM was added to Chapter 3 titled Soils and Biological Crusts. Information about departures from expected soil conditions using Assessment, Inventory, and Monitoring data can be found in Appendix A. As noted in Chapter 3 titled Soils and Biological Crusts, survey or inventory data for BSC is not required for the BENM planning effort; however, agencies will continue to collect BSC frequency and cover data.
14767-174	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.2, we see: Management methods involving Traditional Indigenous Knowledge have been considered throughout the analysis; however, in many cases, specific details of Traditional Indigenous Knowledge to be applied are not included So actions have been considered throughout the analysis but the analysis (the EIS) is silent. How does that comply with NEPA? So we have analyzed all these actions, but were not going to tell you what the actions are or what the effects are. Then you have not considered them under NEPA. Your position is absurd.	DATA02-Inadequate Methodologies, TIK01-Traditional Ecological or Indigenous Knowledge	Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. Traditional Ecological Knowledge, just as Western Science, is simply a method for generating knowledge. As stated in Section titled Traditional Indigenous Knowledge and the Bears Ears Landscape is considered in combination with Western Science.
889-34	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The Arch Canyon route has now been effectively managed under basically these same rules for 16 years, and despite increased use as it has become more well-known and OHV recreation has increased generally, it is still not causing any serious impacts to the creek, cultural sites, wildlife, or any other resources in the canyon. The 2020 management plans determined that continued motorized use on this route was not incompatible with protecting monument objects and values (which at that time included archeological and paleontological sites) and nothing has changed in the last two years to necessitate altering this decision. The only change since 2020 is a new presidential administration and a new monument proclamation. The only difference between the Biden proclamation and the Trump proclamation with respect to Arch Canyon is that the Biden proclamation added mentions of the stream providing potential habitat for sensitive fish and Navajo sedge populations in the canyon bottom. Even if these additional things are considered new objects of protection, neither of them justify closing this route to motorized use because the BLM has repeatedly found the route is not adversely affecting either the stream or endangered plants. No reasonable argument can be made that the Arch Canyon OHV route is incompatible with protecting the current monument objects and values. Any potential impacts to them could be mitigated by following the adaptive management guidelines in the 2020 monument management plan, which allowed for more restrictive group size limitations in the future if determined to be necessary by regular monitoring.	DATA02-Inadequate Methodologies, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
916-20	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Avoid Overstating the Impact of Motorized Access and Motorized Recreation on Fish and Wildlife [see letter for further detail and rationale]	DATA02-Inadequate Methodologies, TRAVEL01-General, WILDFISH01-General	The RMP/EIS acknowledges motorized vehicles as one of the many anthropogenic disturbances that contributes to habitat fragmentation, noise, direct species mortality, and soil and vegetation impacts. The impact of motorized access and motorized recreation on fish and wildlife can be variable, depending on factors such as the type of vehicles, the intensity of use, and the sensitivity of the habitat. Chapter 3, Wildlife and Fisheries, discusses the affected environment and environmental consequences for wildlife and fisheries. Impacts to wildlife and fisheries under the Proposed Plan are disclosed in Chapter 2, Wildlife and Fisheries. Under all alternatives, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use (See Chapter 2 Travel and Transportation Management).
14767-206	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Although off-site water sources do protect ecological function at the spring source and reduce direct impacts from trampling, often other natural ecosystems are impacted by reduced water availability, such as wet meadows around the springs, as well as reduced flows at the spring sites. Yet all alternatives allow for the continued impacts discussed above as well as new water developments, due to the loopholes the BLM has created to allow for this. Yet the BLM, despite these admissions, fails to even consider whether these impacts comply with the protect and restore mandate.	DATA02-Inadequate Methodologies, WAT01-General	Under the Proposed Plan, in Chapter 3, Livestock Grazing, it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and (BLM-administered lands only) A current (within the last 10 years) land health assessment has been completed. Impacts from water developments on water resources is discussed in the Water Resources section of Chapter 3.
889-99	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Notably, the only actual analysis in the DEIS regarding the impacts of the Arch Canyon road on water quality relies on data collected prior to the BLMs 2010 decision to deny SUWAs petition to close the road and its finding that the route was NOT causing significant adverse effects on water quality. The DEIS states: Detailed water sampling was conducted as part of a monitoring program for vehicle recreation permits, including Jeep Safari, ATV Safari, Jeep Jamboree, and other events. Samples were collected by BLM staff in Arch Creek from 2003 to 2010 at two locations: sample site Arch Ck near mouth and sample site Arch Ck 4 miles above Comb Wash. Sample site Arch Ck near mouth is	DATA02-Inadequate Methodologies, WAT01-General, TRAVEL01-General	Thank you for your comment. Additional information on OHV impacts to water resources in Arch Canyon was added to the Water Resources section of Chapter 3 and Appendix N.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			located downstream of all but one (59/60) road crossings of Arch Creek and serves as a comprehensive site for measuring the effect of recreational vehicles on water quality. Samples were usually taken several days before an event, the day of the event, and several days after the event. Laboratory tests included several hydrocarbon analyses, total suspended solids, and TDS. Field data collected included pH, specific conductivity, stream temperature, turbidity, and stream flows. Hydrocarbon analysis included total recoverable petroleum hydrocarbons, total petroleum hydrocarbons-diesel range organics, and total petroleum hydrocarbons gasoline range organics (TPH-g). Minor amounts of total recoverable petroleum hydrocarbons, which include oil and grease, were detected after several permitted events. Values ranged from 3.3 to 3.7 mg/L, all above the level of detection (3.0 mg/L). Vehicles, especially oil and grease from the undercarriage, are the most likely source of these hydrocarbons. As vehicles cross a stream, water splashes on the undercarriage and can wash dirt, grease, and any leaking fluids into the stream. During high stream flow, these levels can increase because the vehicles travel through deeper water crossing the stream. The State of Utah standard for turbidity is a change of less than 10 nephelometric turbidity units (NTUs), usually comparing upstream and downstream of an activity. Turbidity increased from 10 NTUs pre-event to 61 NTUs on the day of the event, with a reduced level of 6 NTUs post-event. With a consistent stream flow and no other disturbances to the stream, this general comparison indicates an increase in sediment load on the day of the event, decreasing within hours of recreational vehicle disturbance. Although it is difficult to quantify the sediment contribution from vehicle use, it can be assumed that vehicles resuspend sediment already present in the streambed when crossing the stream. Other parameters sampled during the permitted events are determined to not be influenced exclusively by recreational vehicles. Stream temperature, dissolved oxygen, and total phosphorous levels have been elevated at the sample locations but are related to the high daytime temperatures and low-flow conditions during mid- to late summer. 3-57 Although this effort was focused on one area of the Monument, it points to water contamination from vehicle disturbance and the need for additional data on this activity throughout the Monument.20 This section of the DEIS, along with other allusions to it found throughout the document, is the only place where the agencies attempt to provide an actual analysis of the impacts of the Arch Canyon road, relying on data that is at least 15 years old. While these findings are now cited to justify closing the road, these are the exact same data the BLM used in 2010 to conclude that the road was NOT causing adverse effects to water quality and that closure of the road was NOT warranted.		
14767-207	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Also under Alternative A, prior to any project activities, riparian areas and/or wetlands must be mapped and evaluated so project-specific impacts can be analyzed and so mitigation measures can be developed and implemented as necessary to prevent degradation But the BLM misleads the reader, as the primary impact to riparian areas is livestock grazing which the BLM has exempted from this because its an on-going action.	DATA02-Inadequate Methodologies, WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	The Livestock Grazing section of the Proposed Plan includes management actions for riparian areas and PFC. Impacts to water resources from livestock grazing are discussed in the Water Resources section of Chapter 3.
889-81	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	While the DEIS does not include any discussion of drone impacts on wildlife, if that is a concern, it would be better for the agencies to address the issue directly with language prohibiting drones from being used to harass wildlife, and establishing standards such as minimum distances drones may be flown from animals. We suggest simply incorporating the Forest Services existing guidelines for drone use around wildlife: Do not fly over or near wildlife as this can create stress that may cause significant harm and even death. Intentional disturbance of animals during breeding, nesting, rearing of young, or other critical life history functions is not allowed unless approved as research or management. Follow State wildlife and fish agency regulations on the use of UAS to search for or detect wildlife and fish. Launch the UAS more than 100 meters (328 feet) from wildlife. Do not approach animals or birds vertically with the UAS.37	DATA02-Inadequate Methodologies, WILDFISH01-General	See the Proposed Plan in Chapter 2 in the Travel and Transportation Management section, for management related to unmanned aircraft systems or drones. On NFS lands, landing and takeoff of aircraft would be permit only. On BLM-managed lands, motorized aircraft would only be allowed on routes designated for such use. In some cases, individuals or organizations may apply for permits to operate drones for specific purposes such as research, monitoring, or filmmaking. These permits are issued based on compliance with regulations and after thorough review of potential impacts. The impacts to fish and wildlife species due to anthropogenic noise, vehicles, and equipment (such a drones) are described in Appendix N, Natural Soundscapes section. Language has been added to this section to include drone disturbance.
19033-9	Randy Parker	Salt Lake County Farm Bureau	In Utah, we have seen more than 70 percent of historic grazing AUMs cut or suspended through federal agency management actions. Use of the planning process for the Bears Ears National Monument provides a vehicle and one more tool to reduce or end livestock grazing. Please consider what the impact of displacing or terminating even a single average sized family cattle ranching operation would be: Utah is a cow-calf cattle production state with cattle and calves contributing more than one-third of the state's agricultural commodity sales. According to the Salina Livestock Auction, feeder cattle arriving from across Southern Utah for auction generally averaged between 550-650 pounds and were valued at about \$2.00 per pound or \$1,000 per head. An average cow-calf ranching operation with 500 mother cows and a 95-percent calf survival rate adds more than \$500,000 in direct cattle sales to the local economy. Based on a conservative economic multiplier effect, as feeder cattle sales dollars are spent in the local economy, that single family ranching business is the catalyst for more than \$750,000 in rural Southeast Utah! If you take a regional look at the recent number of mother cattle, in Southeast Utah's San Juan (14,000), Garfield (17,000) and Kane (8,000) Counties, there were 39,000 mother cows that spent time grazing on federally managed lands in 2020. Those family cattle ranches generated more than \$30 million in direct feeder cattle sales and contributed in excess of \$50 million to the rural communities they support year-round. And this is a contribution that renews itself every year with the new calf crop.	DATA03; EJSOC03	Impacts on economic conditions from changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values section for Environmental Consequences, under the subheaders for Economic Contributions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in Environmental Justice and Social and Economic Values section for Environmental Consequences, under the subheaders for Social Conditions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. The Environmental Justice and Social and Economic section of Chapter 3 discusses root grazing contributions to the region's economy, and the multiplier impacts resulting from grazing activities. The discussion of environmental consequences for grazing activities is documented in the Proposed Plan using IMPLAN analysis, which clearly depicts these multiplier impacts from indirect and induced impacts. The Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 97% of BENM lands that are currently available would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19036-1	Gail Johnson		All people who live here or once lived here were immigrants to the area at some point. Robert S. McPherson's book, History of San Juan County - In the Palm of Time, 1995, explains this migration in depth. t refer you to his excellent remarks on this subject in Blue Mountain Shadows, Vol. 57 / Spring 2018, p. 3. (See attachment #4, used with permission from the San Juan Historical Commission)	DATA03; HIST001	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
19036-2	Gail Johnson		The editors of Blue Mountain Shadows magazine have gathered and published histories related to the people of San Juan County. You cannot talk about the landscape of Bears Ears National Monument without talking about San Juan County. They are inexplicably linked. I have selected many of these articles that relate to the monument.	DATA03; HIST001	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
19026-20	Brian Carlstrom	National Park Service	3-352 3.20.2, Affected Environment, Environmental Consequences National Trails NPS notes missing data from the OSNHT Corridor Inventory in order to complete impacts analysis under the alternatives. It was mentioned in the Cooperators' Meeting on 9/21/23 that this inventory data and analysis would be included in the FEIS.	DATA03; TRAVEL01	The OSNHT is outside of the Planning Area.
14767-82	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We also request that you carefully review the ruling in Northern Plains Resource Council, which we attach to our comments.	DATA03-Suggest Additional Data Source	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
14767-47	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We request the RMP team to review all of drought information we provided, including citations. We request that a drought policy similar to the Tonto National Forests be incorporated into the RMP. If the BLM does not feel this information is applicable to the RMP, we request that the EIS provide reasoning to support that claim. Without such review and analysis, the requirements of NEPA will not have been satisfied.	DATA03-Suggest Additional Data Source	Management actions common to all alternatives (see Chapter 2 Recreation and Visitor Services, and Livestock Grazing), as well as specifically under the Proposed Plan (see sections titled Livestock Grazing, Soil Resources, and Vegetation) include direction relating to management of resources during periods of drought. The agencies may consider the Tonto National Forest policy as the implementation level drought management plan is developed.
17577-3	Wayne Y Hoskisson		If I recall correctly Mark Maryboy performed extensive cultural surveys of the Bears Ears region. If those are available they should be included in any analysis.	DATA03-Suggest Additional Data Source	Analysis of potential impacts was conducted using cultural resources survey data provided by the agencies and included all formally documented archaeological sites located within the Monument boundaries. The Proposed Plan analysis also incorporates publicly available and some publicly unavailable data into the analysis.
17358-5	Ramona Blaber Oak Park, IL	Sierra Club	While Alternative E is the most favorable, I invite you to improve grazing plans in more intentional sealing off grazing in areas for extended time and then leaving this open for grazing and sealing a different patch. Allan Savory studied this. This enriches the land and makes grazing more productive. This, as you know, was demonstrated at Ghost Ranch Educational and Conference Center, Abiqui, NM.	DATA03-Suggest Additional Data Source, ALT05-Alternative E, GRAZ01-General	In Chapter 2, Livestock and Grazing, under the Proposed Plan, within three years of the signing of the ROD, 7 allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewals will be guided by current land health evaluations. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
18238-64	Chaitna Sinha		Butler Wash - Perkins North allotment, Butler Wash pasture; Tank Bench Brushy Basin allotment, Butler Wash pasture We propose that these two pastures from Alternative D be made unavailable for grazing in the final plan. Butler Wash its cultural sites are specifically identified in the Proclamations, as are canyon bottom riparian communities and the wildlife dependent on them across the Monument. The two pastures of Butler Wash specified above, while relatively small, contain an abundance of cultural resources and a crucially important riparian area, which are being negatively impacted by cattle grazing. See Appendix A, Butler Wash Condition Assessment. Accordingly, these pastures should be made unavailable to cattle grazing in order to protect Monument objects and comply with the Proclamations.	DATA03-Suggest Additional Data Source, ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, the nine side canyons of Butler Wash would remain unavailable and Butler Wash - Lower 1, and Butler Wash - Lower 2 would be made unavailable. Tank Bench/Brushy Basin and Perkins North allotments would be evaluated using a land health assessment within 3 years of the signing of the ROD to inform grazing permit processing.
18238-65	Chaitna Sinha		We propose that Moqui Canyon be made unavailable to grazing in the final plan. Moqui Canyon is specifically identified as a Monument object, as are canyon bottom riparian communities and the wildlife dependent on them across the Monument. In addition, Proclamation 10285 identifies archaeological remains on Mancos Mesa dating back 2,000 years and spanning across the Basketmaker II and III and Pueblo I, II, and III periods. Moqui Canyon is home to a riparian area that is being degraded by cattle, including heavy browsing of woody riparian vegetation, trampled and eroding streambanks, cattle feces deposited directly in the water, and a proliferation of disturbance-induced non-native vegetation. See Appendix A, Moqui Canyon Condition Assessment. Moqui Canyon also contains abundant and significant cultural sites which grazing threatens to damage. Additional information regarding the conditions of riparian vegetation in this area of Moqui Canyon is available through the BLMs Assessment, Inventory, and Monitoring (AIM) Data Viewer. The table below includes AIM Lotic Indicators data collected in 2018 and 2020 for two sites within this Lower Moqui polygon. [see table in letter]	DATA03-Suggest Additional Data Source, ALT05-Alternative E, GRAZ01-General	Moqui Canyon (Middle) and Moqui Canyon - Lower would be restricted to livestock trailing only under the Proposed Plan in Chapter 2, Livestock and Grazing. In addition, Chapter 2, Livestock and Grazing and Appendix G includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic/riparian functions. As outlined in the regulations, if livestock grazing is a causal factor in impairing the functionality of these riparian areas, then changes will be made to allow for progress towards meeting the applicable standard (e.g., riparian) of concern.
18238-67	Chaitna Sinha		We propose that the Johns Canyon area from Alternative D be made unavailable for grazing in the final plan. Johns Canyon is home to canyon bottom riparian communities and the wildlife dependent on them, which are identified as Monument objects. Johns Canyon is being damaged by cattle, including degradation of water quality by cattle feces, a proliferation of disturbance-induced non-native vegetation, and trampled biological soil crust along with large areas of bare ground. See Appendix A, Johns Canyon Condition Assessment. Johns Canyon is also being considered as an ACEC in Alternative E, with relevant and important values ranging from paleontological, cultural, scenic, fish and wildlife, to threatened species (Navajo sedge [Carex specuicola]). Grazing in this area is not	DATA03-Suggest Additional Data Source, ALT05-Alternative E, GRAZ01-General	John's Canyon would be made unavailable to grazing in the Proposed Plan. John's Canyon ACEC will not be designated an ACEC under the Proposed Plan

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			consistent with the protection of Monument objects and values, or with the relevant and important values of the Johns Canyon ACEC.		
14767-213	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We have provided a wide range of documents, as attachments to these comments. They clearly demonstrate that livestock grazing within BENM has had and continues to have major impacts on the ecosystem function that is far from the absurd neutral effect the BLM, without support, claims.	DATA03-Suggest Additional Data Source, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
14767-104	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Fundamental to compliance with FLPMA Section 302(a), The Omnibus Public Lands Act of 2009 and the NLCS requirements discussed above is the fact that cattle are a large non-native herbivore of which there was no analogous species since at least the last ice age. Carter et al., 2014 Holistic Management: Misinformation on the Science of Grazed Ecosystems provides a review of this issue in Section 2. We requested that you review this as well as the literature cited in this section, during scoping. The BLM chose to ignore this clearly applicable science and so we again bring it to your attention. The paper concludes: Western US ecosystems outside the prairies in which bison occurred are not adapted to the impact of large herds of livestock.	DATA03-Suggest Additional Data Source, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
14767-136	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	On Perkins Brothers, we clipped 39 192 square foot plots (20 times the normal 9.6 sq plots) of all forage species. The average total forage production was 15 pounds per acre, a tiny fraction of potential production. We also used the bed and breakfast fenced private land as an enclosure for paired plots. In the ungrazed enclosure, production was 182 pounds per acre while the paired plot outside the enclosure was 31 pounds per acre, 17% of the ungrazed area. Setting aside the fact that the enclosure was far from restored, even so, BLMs management failures resulted in 83% reduction in production. What is the effect on objects of such massive degradation? The EIS is silent. Moving to Lake Canyon, here we clipped 192 sq plots over nearly all of BLMs long term transects. The average total forage production was 17 pounds per acre, again a tiny fraction of potential. When we calculated Similarity Index based on the applicable ESDs for total grass production, the average of the 12 sites was 7%, the low end of POOR. For Indian Creek, we clipped most of the BLM long term transects plus a number of randomly generated sites, by ESD for areas not represented by BLM transects. A total of 17 transects were clipped by species in the front country pastures. Total forage production averaged 17 pounds per acre, a tiny fraction of potential. The average Similarity Index calculations of all grasses was 9% of potential, the low end of POOR. In addition to all grass species severely below potential, most of the palatable shrubs had been functionally extirpated from the ecosystem.	DATA03-Suggest Additional Data Source, GRAZ01-General	The Proposed Plan in Chapter 2, Livestock and Grazing outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan also includes prioritizing seven allotments for the completion of rangeland health assessments within 3 years and NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals. The North Cottonwood and Upper North Cottonwood pastures of the Indian Creek Allotment are limited to trailing under the Proposed Plan.
14767-15	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	There is no native, natural correlate to livestock in the arid west. Prior to the European invasion there were no significant densities of hooved herbivores in the arid west. All the impacts of livestock are beyond that which the system can tolerate or has evolved with. See for instance Mack and Thompson, attached and USDA RMRS-GTR-169, also attached.	DATA03-Suggest Additional Data Source, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
18612-1	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	Table 1 below compares the number of unsuitable/unavailable acres to available acres for each alternative.	DATA03-Suggest Additional Data Source, GRAZ01-General	The numbers provided by the commentor are the existing AUMs/HMs included in the alternatives and Proposed Plan.
642-4	BLM should not be cowed by ranchers		The attachment summarizes why grazing reforms are appropriate and necessary.	DATA03-Suggest Additional Data Source, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
9189-2	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	I have been visiting the Bears Ears and other landscapes in Southern Utah since the mid-1970s. While the landscape is magnificent, the lands are terribly degraded by a century and a half of livestock grazing. This has resulted in deeply incised streams that have lost their floodplains with many becoming intermittent or lost due to watershed degradation and removal of bank stabilizing vegetation. Soils are highly erodible and are severely eroding due to the loss of biological crusts and native plants that protect the soil surface. Weeds proliferate. Springs are drying up, and both streams and springs are heavily polluted with livestock waste. Over the years I have collected data and submitted detailed analyses and reports to BLM for the Grand Staircase NM, Moab and Monticello RMPs. Both of these RMPs were severely deficient in protecting or restoring this degraded landscape and essentially perpetuated the uses that create the damage. This information has been disregarded completely. I hereby incorporate my comments and protest of both the Moab and Monticello RMPs. These also include the references relied upon and which remain applicable today. Visit the provided links to access these. (Commenter provided links to Box.com file sharing website with numerous reference materials)	DATA03-Suggest Additional Data Source, GRAZ01-General	See the Proposed Plan for management actions regarding protection of riparian, soil, and vegetation resources. Impacts to the resources listed in the comment from livestock grazing are discussed in the Water Resources, Soils, and Vegetation Sections of Chapter 3.
9189-5	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	I reviewed the scientific literature on livestock grazing management. That review shows that proper utilization of 25 30 percent combined with adequate rest is needed so that grazed plants can recover their vigor (stature, seed production) before being grazed again. Sensitive native bunchgrasses such as Bluebunch wheatgrass, Idaho fescue or Indian ricegrass cannot be maintained otherwise and will be lost from the system. That review also determined that use of grazing systems such as rest-rotation cannot overcome the adverse impacts of overuse and lack of rest for plant recovery. ³ I and my co-authors previously published a paper on holistic management in response to the current fad of	DATA03-Suggest Additional Data Source, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. The Proposed Plan in Chapter 2, Livestock and Grazing, outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			ignoring the science based principles of range management and buying into the myth that stocking rates are unimportant if you just move the livestock around as is planned here in the RMP.4 That paper also addressed the conditions in Canyonlands National Park which is ungrazed by livestock to grazed areas showing greater soil cover in the Park. It also addressed biodiversity loss due to livestock grazing.		
9189-7	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 2017, I and my co-authors published a paper that summarized our ten years of data collection on a BLM allotment in northern Utah.5 This study evaluated the outcome of upland water developments on stream characteristics and both upland and riparian utilization. Conditions existing prior to installation of the water developments were compared to those existing following their installation and implementation of a four pasture deferred rotation system. We found that riparian bank alteration remained unchanged at 80%. Grazed riparian vegetation residuals remained unchanged. Upland grazed residuals were significantly lower post implementation. Riparian greenline stubble height was significantly lower post implementation. Riparian utilization remained high at 86 99%. Upland utilization ranged between 58 81%. BLM utilization criteria was 50%. Overstocking and failure to set stocking rates to the current forage production, and forage consumption rates combined with the need for long term rest for recovery were the principle causes of degradation. The Forest Service has capability and suitability criteria that include slope, erosion hazard, distance to water and forage production to determine capable lands for livestock grazing. We reviewed the application of these Forest Service criteria as they are used in the Uinta Wilderness in Utah, which is in Region 4.6 Criteria include slopes less than 30% for cattle, 45% for sheep; less than one mile from water; avoid soils with high erosion hazard; and forage production greater than 200 lb/acre air dry forage. When we applied soils data, current forage production, current forage consumption rates, science-based utilization rate of 30%, and rest, we found the Forest Service grossly overstated capable acres and the resulting stocking rate which needed to be reduced by 90% to comply with its own criteria	DATA03-Suggest Additional Data Source, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. The Proposed Plan in Chapter 2, Livestock and Grazing outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
9296-9	John Carter PO Box 464 Bondurant, WY 82922	Yellowstone to Uintas Connection	I and my co-authors previously published a paper on holistic management in response to the current fad of ignoring the science based principles of range management and buying into the myth that stocking rates are unimportant if you just move the livestock around as is planned here in the RMP.4 That paper also addressed the conditions in Canyonlands National Park which is ungrazed by livestock to grazed areas showing greater soil cover in the Park. It also addressed biodiversity loss due to livestock grazing. 1 Feller, J.M. 1996. The Comb Wash Case: The Rule of Law Comes to the Public Rangelands. Public Land & Resources Law Review. 27p. (Attached). 2 Carter, J. 2016. Updating the Animal Unit Month. Yellowstone to Uintas Connection, Paris, Idaho. (Attached). 3 Carter, J. 2013. Utilization, Rest and Grazing Systems A Review. Yellowstone to Uintas Connection, Paris, Idaho. (Attached). 4 Carter, J., Jones, A., OBrien, M.O., Ratner, J., and Wuerthner, G. 2014. Holistic Management: Misinformation on the Science of Grazed Ecosystems. International Journal of Biodiversity, Volume 2014. (Attached)>	DATA03-Suggest Additional Data Source, GRAZ01-General	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. The BLM used the best available science and up to date BLM data to develop the Proposed Plan. The Proposed Plan in Section Chapter 2, Livestock and Grazing outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
18238-45	Chaitna Sinha		We propose: In Attachment 2 we provide a revised Recreation and Visitor Services matrix with all of our proposed improvements to Alternative E. We found the Recreation and Visitor Services matrix in the DEIS, particularly related to Alternative E, to be extremely confusing, redundant, and at times contradictory. DEIS, Vol. 1, Table 2-19. Instead of providing all of our proposed improvements here, we felt it would be easier and more efficient to provide a revised matrix.	DATA03-Suggest Additional Data Source, REC01-General, ALT05-Alternative E	We appreciate the suggested changes to clean up, move text and make clear sections of the plan. In the Proposed Plan, we have made adjustments that meet this end. Some suggestions were non-substantive, did not provide new information, rationales, or were inconsistent and thus no changes were made. Responses to specific page comments: Page 3: Where appropriate and the agencies have determined a need, timelines have been incorporated for implementation planning. In the Proposed Plan, we have made some language adjustments that meet this end described in this comment. We appreciate the additional collaboration identified with the BEC. The agencies have outlined collaboration in many instances. If not identified some of the specifics outlined would occur through implementation-level planning. Some suggestions were not accepted as they are purely implementation-level and could be incorporated outside of the planning process if warranted. Page 5: Management zones have been adjusted in the Proposed Plan. Page 6: The agencies considered a range of alternatives for vending, motorized events and competitive activities, and the decisions related to these activities are included in the Proposed Plan. Page 7: We appreciate the input on campsites and identifying new dispersed sites. The Proposed Plan addresses dispersed site inventories in parts of the moment and management of dispersed camping. Page 9: Adjustments have been made to the pets section of the Proposed Plan. Thanks for the input about specific animal species and seasonal restrictions. Page 10: We appreciate the idea about additional requirements for management zone implementation plans and special recreation permits. We have determined that our focus for implementation planning should be on the plans already identified within the document, some of which cover similar areas and may be duplicative. Pages 11 and 12: See Proposed Plan for motorized events. In Arch Canyon the BLM will no longer allow for motorized events however motorized events will continue in other locations. This comment does not provide new information about how motorized events in other locations are causing additional impacts beyond those caused by casual use. We appreciate the input on existing permits, camping, and human

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					waste management, the Proposed Plan covers these topics. The Proposed Plan will have information surrounding these topics. Regarding the vague nature of protecting Monument objects, this language gives the agencies the discretion about how to address unforeseen actions and is standard language (Handbook H2390-1). Table (Page 13-21) We appreciate the input about the different zones and have incorporated many changes to the zones that address things pointed out in this section, including monitoring and presence in the areas, boundaries and allowable uses.
14767-5	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We provide a discussion below in more detail but as laid out in Mack and Thompson, RMRS-GTR-169 (attached) and many other studies, prior to the European invasion of the western US, the systems west of the Great Plains had negligible levels of large herbivore that did not have an effect on the evolutionary trajectory and function of these systems. It was only with the introduction of livestock that the systems collapsed. The glue that holds these arid systems together is BSC which has a complete incompatibility with high densities of large herbivores. The basic and fundamental incompatibility must be front and center during the entire RMP development process. The mandate of the Proclamation is not to damage and destroy BSC slightly less, but to protect and recover them.	DATA03-Suggest Additional Data Source, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	Language was revised in Appendix N, Soils and Biological Crusts section and Livestock and Grazing section, and Appendix G and includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator. The Proposed Plan in Chapter 2, Livestock and Grazing, and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
889-32	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	In 2010 the BLM settled SUWAs lawsuit and agreed to reconsider SUWAs 2007 petition to close the Arch Canyon route under the BLMs emergency closure authority. On October 13, 2010, Monticello Field Office Manager Thomas Heinlein denied SUWAs petition a second time, finding that motorized vehicle use in Arch Canyon is not causing or threatening to cause considerable adverse effects to cultural, riparian or fisheries resources in the Canyon. ¹⁸ This final petition denial included extensive analysis of any potential impacts of the Arch Canyon road, finding that the riparian area was in Properly Functioning Condition and that the road was not negatively impacting fish species, archaeological sites, or any other resources in the canyon. Regarding impacts to cultural sites, the BLM determined that Almost all of the adverse effects that were identified are a result of activities that took place years and even decades ago and such effects cannot be attributed to OHV use. ¹⁹ The BLMs full 2010 petition denial decision is attached and is incorporated by reference into these comments.	DATA03-Suggest Additional Data Source, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18082-59	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	On March 21, 2023, the CEQ published a memo titled Guidance to Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors. ²¹ This memo reinforces the need to promote greater connectivity across terrestrial and freshwater habitats, as well as across airspaces; to sustain biodiversity; and to enable wildlife to adapt to fluctuating environmental conditions, including those caused by climate change. We recommend utilizing this guidance to inform management actions, best management practices, and mitigation measures to conserve, enhance, protect, and restore corridors and connectivity.	DATA03-Suggest Additional Data Source, WILDFISH02-Wildlife Habitat	The best available data and information will be used by the agencies to inform BMPs for wildlife and their habitats.
18417-2	Sol Lothe Taos, NM		At one point, I was interested in and concerned about the potential impacts of aircraft on wildlife, specifically Raptors, and I was surprised to read some of the research papers on the subject that indicated that there was likely not nearly as much of an impact on wildlife as one might think. I have attached a really interesting study on the subject: Golden Eagle Indifference to Heli-Skiing and Military Helicopters in Northern Utah, published in the Journal of Wildlife Management 74(6):12751285; 2010; DOI: 10.2193/2009-337. The Literature Cited section includes most of the research related to aircraft and Raptors, but perhaps the most notable takeaway can be found in the last paragraph: Unorthodox scientific findings such as the surprising indifference of golden eagles to helicopters that we found in our study highlight a growing conundrum all too common in human disturbance wildlife research. First, participating agencies and organizations must recognize species-, site-, and circumstance-specific research is prerequisite for effectively assessing any potential human impacts on wildlife. However, second and equally critical, when such research is successfully executed, those same responsible management entities should accept and incorporate scientifically valid results, whether or not those results are consistent with expectations or tradition. Continuing to manage otherwise undermines the integrity of resource management and leaves the resource more vulnerable to real threats in the future. The draft RMP includes concern about preserving natural soundscapes, but I wonder if the perspective quoted above might be applicable here in the context of how airplanes landing at these existing airstrips may or may not actually affect the perceptible soundscape of the Monument. The sound signature or airplanes would seem to be such a short duration of activity while landing at and taking off from these airstrips that I wonder if there is really a noticeable effect?	DATA03-Suggest Additional Data Source, WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	The agencies currently adhere to the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances protocol (Romin and Muck 2002) for management of raptor species. Additional data sources will be considered in raptor BMPs. Information was added to Appendix N regarding drone impacts on wildlife.
19033-3	Randy Parker	Salt Lake County Farm Bureau	The number of ranching families using federal rangelands as a part of their business operation has dropped dramatically between the years identified as Peak AUMs and the 2012 number of active AUMs. [see attachment for data supporting this statement] If more current statistics and data were available, they would likely indicate a continuation of the declines in BLM and FS grazing AUMs ultimately leading to declining family ranching operations in the public lands states and their economic contributions to rural communities. Individual BLM and/or FS rulemaking must be considered collectively because of the adverse impact they have had on the overall sustainability of viable ranching operations In Utah and across the West	DATA04; GRAZO1	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values section for Environmental Consequences, under the subheaders for Economic Contributions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in Environmental Justice and Social and Economic Values section for Environmental Consequences, under the subheaders for Social Conditions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18082-11	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Cumulative effects are effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time. ⁸ The Draft EIS cumulative effects analyses for the resource areas and authorized activities are succinct qualitative discussions that provide examples of projects and activities that contribute to cumulative impacts. However, the analysis does not include an evaluation of expected impacts from activities that may be permitted or authorized by BLM under this RMP, when added to the impacts of all other Federal and non-Federal past, present, and reasonably foreseeable actions, so it is difficult to understand the magnitude of cumulative impacts under each alternative and how those cumulative effects will impact Monument ROVs. In the Final EIS we recommend utilizing the Council on Environmental Quality (CEQ) document Considering Cumulative Effects Under the National Environmental Policy Act ⁹ to improve upon these deficiencies in the cumulative effects analyses. Additionally, we recommend the Final EIS propose management changes to address the cumulative effects that are identified.	DATA04-Cumulative Effects Analysis	Appendix J provides a list of reasonably foreseeable future actions and the cumulative effects analysis throughout chapter 3 for the resources provides discussion of the cumulative effects of this list on the resource. Those activities authorized by the RMP are also discussed in the environmental consequences for each resource.
14767-39	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	All alternatives shall assess the cumulative impacts of livestock along with all other impacts including global warming.	DATA04-Cumulative Effects Analysis	Cumulative Impacts are analyzed in the environmental consequences section for each resource, including those of livestock grazing and climate change.
18657-63	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The RMP planning team did not represent an interdisciplinary approach. An obvious lack of agency representation and expertise in sociology, economics, and recreation management has resulted in a chasm of missing data and analysis to inform RMP process and outcomes related to cumulative impacts on public access, local economies, as well as diverse social groups and stakeholders.	DATA04-Cumulative Effects Analysis	Appendix O, Consultation and Coordination, and the List of Preparers, describes the diverse input used to prepare the RMP/EIS. It includes agency personnel that covered socioeconomics and recreation.
18657-64	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Use of active management and mitigation measures are noticeably lacking throughout the RMP planning process and documents. While NEPA is intended to prevent cumulative impacts from closures and restrictions to public access on public lands through comprehensive environmental review processes, public involvement, interdisciplinary analysis, mitigation measures, and adaptive management strategies, the RMP planning team failed to adhere to NEPA mandates and therefore failed to leverage these mechanisms to ensure that the potential cumulative effects of management actions were thoroughly considered and addressed. As a result, the BENM draft RMP does not promote sustainable and balanced use of public lands. We call the attention of RMP planning managers to this failure in compliance with NEPA mandates, and subsequent imposition of unjustifiable, arbitrary, and capricious negative cumulative impacts. We urge RMP planning managers to refrain from advancing the draft RMP to final status, or adopting any of the five alternatives or combination of alternatives as currently reflected within the draft RMP, without first rectifying each of the legal and procedural violations specific to cumulative impacts as noted above.	DATA04-Cumulative Effects Analysis	Appendix J, Cumulative Actions, describes the reasonably foreseeable future actions that could contribute to cumulative impacts. Past projects are captured in the affected environment for each resource. Furthermore, each resource contains a cumulative impacts section within its analysis to disclose potential cumulative impacts.
18275-9	Jamie Ervin	Outdoor Alliance	The Final EIS should more clearly delineate these future planning efforts and, where possible, provide a timeline for when these planning efforts will occur. This information will help stakeholders, including recreationists, better understand when and how site-specific decisions will be made and will help stakeholders prepare to provide constructive input on these potentially consequential planning efforts. The Final EIS should clearly describe these implementation level plans and include an anticipated timeline for their development. Below, we have summarized some of the future planning efforts that will be significant for the recreation community: Tribal Interpretation Plan: Under Alternative E, the agencies and the BEC would develop a tribal interpretation plan for recreational visitors. ²⁶ Outdoor Alliance supports this planning effort and looks forward to collaborating with Tribal Nations to educate members of our community on the cultural values of the BENM landscape. Travel Management Planning: The agencies will undergo travel planning for the entirety of BENM to evaluate roads and trails for future motorized and mechanized use. Non-motorized trail planning: In addition to travel planning, future planning will also be conducted to evaluate the non-motorized trail system (including non-designated routes), as well as areas used for cross-country hiking. Camping: Future planning would be conducted to evaluate and designate camping opportunities throughout BENM. This would include designating areas for dispersed camping and potentially closing sites if they are affecting BENM objects. Under Alternative E, this would also include designating campsites and requiring reservations throughout the upper and lower San Juan River segments. The river itself already requires a hard-to-get lottery permit and adding further limitations could be overly cumbersome. Plans for BENM Zones: Under Alternative E, management plans would be developed for all zones, including recreation and interpretation plans, in order to protect BENM objects. ²⁷ It is unclear if this means that a single plan will be developed for each zone, or if smaller site-specific plans will be developed for particular areas of BENM within each zone. Given the large area covered by the Remote Zone, in particular, we recommend that the Final RMP allow for plans to be developed for smaller areas (such as for a potential Indian Creek SRMA) to account for areas of the monument that receive concentrated recreational use. Plans for BENM permits: Implementation level planning would be conducted to establish stipulations (such as group size limits or limits on user days) for SRPs and SUPs. Site-specific plans: The DEIS also notes that RAMPs or other specific management plans or directives, would be developed for areas of BENM that experience year-round or seasonal use that requires greater management prohibitions to protect Monument objects. Examples included	DATA04-Cumulative Effects Analysis, REC01-General	The agencies have included timelines to prioritize the creation of implementation-level plans. Timing for remaining plans will be established during the implementation phase of those plans. For details on implementation, See Appendix T for implementation plans.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			areas of special designations, such as TCPs, ACECs, or other cultural and/or resource-specific requirements guided by Monument proclamations or other federal laws.28		
12746-32	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	Even if a project was building trailheads for hiking or other uses in these areas, this project would be more complex and time consuming after the changes proposed. These designations and facilities for nonmotorized opportunities are useless if the public does not have motorized access to the areas. Building basic infrastructure for even basic access for other uses will be complicated in an area closed to motorized usage. The Organizations submit each of these designations makes any expansion of recreational access in any form more difficult and clearly does not facilitate expansion of recreational opportunities.	DATA04-Cumulative Effects Analysis, REC01-General, TRAVEL01-General	The Proposed Plan provides opportunities for a travel and transportation network that provides access by a variety of users while protecting BENM objects. Route by route travel management planning will occur through implementation level travel planning. See the Travel and Transportation Management appendix. See Chapter 2, Recreation and Visitor Services, of the Proposed Plan for a description of management zone objectives regarding recreation facilities.
18612-13	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	The large amount of proposed projects affecting water resources must be taken into account in cumulative effects analyses of water resources (Vol II, Appendix J, Table J-1). This includes the large number of wells that are being drilled at this time on SITLA land within the monument. The total number is opaque but we have anecdotally noticed that new wells appear to be rapidly increasing. As the Draft RMP says on page 3-66, Surface water and groundwater resources are interconnected. Changes to groundwater conditions, such as water quality, depth, or static water levels, can affect surface water resources over time. BENM management must analyze the impacts of SITLA wells to aquifers and surface waters like springs and seeps, as well as impacts to riparian vegetation and hanging gardens, seeps, and other water-dependent monument objects.	DATA04-Cumulative Effects Analysis, WAT01-General	Appendix N discusses the presence of water wells within the Planning Area and was updated to include wells on TLA land. Cumulative impacts in the Water Resources section of Chapter 3 was updated to include wells on TLA land..
18112-19	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	The Loss of Trust Land Revenue Will Harm Blanding City. The Utah Constitution mandates that the State manage school trust lands for the benefit of Utahs public schools, affecting communities in southern Utah like Blanding City. Utah Const. art. XX, 2. The Bureau knows this, see Draft Plan 3- 192, but its proposed revisions to the Bears Ears Plan would jeopardize the States ability to support these schools. The State of Utah uses strategic land management to generate revenue that benefits communities such as Blanding City. See How the Trust Land Funds Get to Your School, https://trustlands.utah.gov/our-impact/trust-lands-to-your-school/ (last visited June 11, 2024). So when the Bureau takes away the States opportunities to generate revenue, that harms Blanding City and other similarly situated communities. The Bureaus proposal shows an ugly disregard for this important facet of local governance.	DATA05-Connected Actions, EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	The agencies added language on impacts on public services, such as education under each alternative in Chapter 3, Environmental Justice and Social and Economic Values.

Table U-6. Archaeological Sites

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19002-3	Maury Bergman bergmanmaury@gmail.com		It is equivocal and illogical to close off a historic or cultural site in the name of protection. What is the purpose in preserving the artifacts and landscapes if no one can see and enjoy them?	ARC01	The Proposed Plan is consistent with all relevant laws and policies.
8305-10	Tracy Bodnar		Remove these intrusive log rail fences from Double Stack Ruin in Butler Wash. This type of barricade is fine for parking lots and trail heads, but has no place in a backcountry archaeological site. It is a major intrusion to the atmosphere of the ancient sites. Replace with a simple t-post and barb wire fence just beyond the midden or down canyon at a pinch-point. Do not use this type of barricade at other backcountry ruins.	ARC01-General	Thank you for the comment. The suggested actions will be considered when more site-specific planning happens in the future. However, all management of cultural resources will be guided by the goals, objectives, and management actions identified in the Cultural Resources section of Chapter 2.
12438-5	Josh Ewing PO Box 328 Bluff, UT 84512		Conversely, the plan carries forward bad ideas from the Trump-era management plan for public use sites, driving tra4ic to the remote and culturally sensitive area around Doll House and creating a problem where none currently exists by drawing tra4ic to the Shay Canyon Site. Intentionally driving additional visitation to cultural sites in Indian Creek is particularly problematic given the high volume of tra4ic on Highway 211 headed to Canyonlands National Park. Whereas most visitors make a quick stop at Newspaper Rock and continue on to the Park, a new public use site will alert visitors to the wealth of petroglyph sites in the area and make more likely damage to the extensive rock imagery sites not far from the Shay Canyon site. While additional public sites are clearly needed in areas like Cedar Mesa and Comb Ridge, as current sites are insu4icient to fill visitor demand and provide educational opportunities, there is no need to have an additional site just a short distance away from Newspaper Rock.	ARC01-General	See the Cultural Resources section of the Proposed Plan for a list of cultural sites that would be allocated as Public Use Developed. Sites could be added or removed as necessary, an in collaboration with the BEC. A cultural resources management plan would be developed under the Proposed Plan that would include site-specific implementation-level direction to effectively manage uses while protecting BENM objects. See the Cultural Resources section of Chapter 3 for a discussion of impacts to cultural resources from visitor use.
14767-72	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In addition, this dysfunctional relationship has resulted in the degradation of archeological resources throughout GCNRA caused by BLMs mismanagement of livestock grazing. These archeological resources are one of the objects the unit was established to protect.	ARC01-General	The potential impacts to archaeological sites by grazing alternatives are described in the Cultural Resources section in Chapter 3.
11767-5	Steven Kloetzel		A Cultural Resources Management Plan is critical for BENM; this CRMP should adopt Tribal definitions of BENM objects and resources, and not include just protections/management guidance for archaeological sites, but also for culturally important plants, wildlife, habitats, significant places.	ARC01-General, ALT05-Alternative E	the Alternatives for Cultural Resources table of the Proposed Plan states CRMP would be developed in collaboration with the BEC.

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12438-9	Josh Ewing PO Box 328 Bluff, UT 84512		The Preferred Alternative limits day or overnight parking to designated parking areas at trailheads in the Cedar Mesa. Because there are so few designated trailheads in the Cedar Mesa area, this would be an effective ban on using a huge portion of the Monument that is frequently used by hikers, backpackers, ranchers, wood cutters, herb and pinon harvesters and many other users. There does not appear to be any exceptions for traditional or ceremonial use or even simple things like trash clean ups alongside the highway. This would make hiking in most of the Cedar Mesa limited to those rich enough to pay for a shuttle drop-off where they could hike from anywhere without having to park their vehicle in a non-designated parking area. While the area encompassed by in the Cedar Mesa is not defined in the plan, a reasonable assumption would be that it would include everything in the current Cedar Mesa RMZ, which includes the Comb Ridge. This would be a complete ban on use of the Comb Ridge, as there is not a single designated trailhead between highways 163 and 95. Defacto blanket bans on visitation to such a large area would almost certainly cause visitors to seek out lesser-known areas to visit cultural resources. Highly sensitive archaeological zones that currently see limited visitation, such as Cottonwood Wash, The Lands Between, and the culturally rich canyons on the USFS portion of the monument would likely see dramatically increased visitation for which they are not prepared.	ARC01-General, ALTO5-Alternative E	The management action discussed in the comment was not brought forward in the Proposed Plan.
18456-1	Stan Allison 524 Cerrillos Drive Farmington, NM 87401		I am concerned that Alternative E concerning wood cutting may not provide enough protection to archaeological sites. The majority of archaeological sites within Bears Ears, especially in the Pinon/Juniper areas are located on mesa tops where wood cutting occurs. Unauthorized driving off road for wood cutting causes a significant amount of impact to these archaeological sites and biological soil crusts. I was unable to find a location in the NEPA analysis where these specific impacts to cultural resources and biological soil crusts were analyzed or discussed.	ARC01-General, ALTO5-Alternative E	Alternatives addressing travel management are provided in the Travel and Transportation Management section of Chapter 2 and the potential impacts of those alternatives to archaeological resources are described in Appendix N.
17358-4	Ramona Blaber Oak Park, IL	Sierra Club	Please also increase the amount of rangers at Kane Gulch and improve their living conditions so that archeological sites and habitat can be protected.	ARC01-General, ALTO7-Modification of Existing Alternatives	Staffing decisions are beyond the scope of this planning-level document.
17617-5	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	The three-tiered system of prioritizing inventory in Alternative A should be added to Alternative E. Also, archaeological inventory should not be limited to Class III – Class II and even rigorous, explicit reconnaissance are also acceptable forms of inventory Earth-Sky based framework is badly needed for cultural sites in BENM. This is a great addition in Alternative E	ARC01-General, ALTO7-Modification of Existing Alternatives	See changes to the Proposed Plan under the Cultural Resources section in Chapter 2. The agencies highlight the importance of the incorporation of Traditional Indigenous Knowledge in prioritization for inventory.
10626-11	Debra Van Putten		Totally undiscussed anywhere in the EIS is why standard federal archeological practices are being abandoned. I have been at a very substantial number of federal recreational locations with sensitive cultural goods. Not one relied primarily on exclusion of people except for Native Americans, while leaving items open to nature as the means of protecting assets. Instead, the apparently accepted practice is to put very fragile items behind glass and larger items such as ruins and petroglyphs are marked, explained, and perhaps fenced. Education as to the value of historical items is viewed the standard and best method to protect artifacts, by my observation of numerous sites. Good examples of this include Hovenweep, not far from Bears Ears, and the Sand Island Petroglyphs, to include the Sand Island Petroglyphs on the north end Sand Island that are totally unfenced, but well-signboarded. (Exhibit M) Why BLM has chosen to depart from standards and norms for Bears Ears most certainly should be discussed in the EIS and is not.	ARC01-General, DATA02-Inadequate Methodologies	All alternatives are fully compliant with federal laws and regulations regarding archaeological resources.
18677-6	Benjamin Bellorado Tucson, AZ		Most southwestern archaeologists genuinely want to work with federal land managers and tribes on collaborative efforts but have been left feeling unrepresented by the process that has been implemented currently which champions only the tribal and conservation perspectives. Many archaeologists who are currently or have recently worked in the BENM area feel that some of the not-for-profit organizations are doing a poor job representing the diverse perspectives, projects, and research conducted by our community.	ARC01-General, PUBL01-Public and Stakeholder Involvement	The BLM and USDA Forest Service have solicited input from professional archaeologists and cultural resources specialists associated with the Department of the Interior, the Department of Agriculture, American Indian Tribes, and members of the public during the BENM planning process.
18677-13	Benjamin Bellorado Tucson, AZ		Efforts should be made by land managers to coordinate with universities, contract archaeological firms, and the BEC to conduct large-scale archaeological, cultural resource, and ethnographic surveys of the entire monument, as called for by the Hopi Tribe in Part F: Knowledge Gaps of the Bears Ears Inter-Tribal Coalition: A Collaborative Land Management Plan for the Bears Ears National Monument (BEITC 2022:47). Efforts should be made to contract these inventory projects to smaller, local firms which would thereby support local communities whenever possible. Using the Bears Ears area as a training ground for budding archaeologists and other scientists, especially with the addition of knowledge and oversight from descendant communities, has the potential to train a new generation of more informed, well-rounded, and culturally sensitive archaeologists, anthropologists, and ethnographers from tribal and non-tribal communities while fostering these learning experiences within a non-destructive and low-impact in-field methods.	ARC01-General, PUBL01-Public and Stakeholder Involvement	Ongoing cultural resources inventory would occur under the Proposed Plan. Priorities for inventory would be established in the CRMP that would be developed in collaboration with the BEC and Tribal Nations. The agencies are also working with partners on multiple ethnographic projects; the Proposed Plan and cultural resource management plan have guidance on continued ethnographic work to document sites important to Tribal Nations and the BEC.
731-2			I am particularly glad to see the road in Arch Canyon closed to OHV access. That trail crosses the stream bed so many times, and it is clear how much damage current OHV usage is already doing to the stream bed and canyon floor habitat. Moreover, the potential for damage of archeological resources is high with continuing off-road vehicle usage in Arch Canyon.	ARC01-General, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon in a manner that protects monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future.

Table U-7. Climate Change

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17617-18	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	The BLM should enhance its co-stewardship of Bears Ears National Monument by fully integrating a whole-of-government approach to climate change into its land management strategies. This approach is underscored by Executive Order 14008, "Tackling the Climate 4 Crisis at Home and Abroad," which emphasizes the need for federal agencies to prioritize climate resilience and environmental justice. Additionally, Secretarial Order 3399 directs the Department of the Interior to center climate considerations in its decisions. By referencing these directives, the BLM can ensure its policies align with national climate goals, supporting sustainable land use, protecting biodiversity, and fostering Indigenous collaboration in Bears Ears	CC01-General	The Climate Change section of Appendix N has been updated to incorporate how the RMP would be consistent with the relevant Executive Orders and other guidance.
18082-54	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Additionally, the Draft EIS does not contain proposed resiliency and adaptation measures to mitigate the potential impacts of climate change on Monument ROVs and BLM-authorized activities. Section I of the Interim Guidance states, Federal proposals may also be affected by climate change, so they should be designed in consideration of resilience and adaptation to a changing climate. We recommend the Final EIS contain resiliency and adaptation measures to mitigate potential impacts of climate change on ROVs and BLM-authorized activities and management actions.	CC01-General	The Proposed Plan includes management actions to protect resources from impacts of climate change, including developing a CRMP that would include a monitoring and stabilization plan for cultural resources impacted by climate change, identifying opportunities for climate change resiliency, and developing a formal drought management plan regarding climate change. Climate change is considered in all resource analyses in the RMP/EIS, as well as discussed specifically in the Climate Change section in Chapter 3 and Appendix N. The agencies will be developing an implementation plan upon finalization of the RMP that outlines how RMP objectives will be met. Part of this plan will be identifying adaptive management thresholds for the resources and uses in the Monument. All implementation plans that require further analysis for implementation level actions will follow applicable laws, such as NEPA and the NHPA, including opportunities for stakeholder involvement.
864-1	Concerned conservationist		At the outset, I believe that this and other federal planning and NEPA analysis processes should actively consider how the proposed action and alternatives may add to or help solve the climate and extinction crises. These overlapping crises pose an existential threat to humanity and the health of the biosphere. On the climate crisis, please review the attached IPCC report. This report summarizes the overwhelming international scientific consensus on the severity of the climate crisis and the urgent need to phase out the use and development of fossil fuels. On the extinction crisis, there are an increasing number of scientific reports on the rapid loss of biological diversity and how this loss undermines the stability, resilience, and productivity of the ecosystems upon which life on Earth depends.	CC01-General	The chapter on climate change address the impacts of the alternatives on greenhouse gas emissions as they contribute to climate change (See the Climate Change section in Chapter 3). Impacts from climate change are also described within the discussion of resources analyzed in Chapter 3. The analysis of the climate change section incorporates the IPCC AR6 (2021 and 2023) report.
12507-4	Daniel Sandweiss 1990 K Street NW, Suite 401 Washington, 20006	Society for American Archaeology	Addressing a changing environment: climate change impacts our physical world and, with it, the tangible remains of our past, irreplaceable cultural resources that inform our histories, cultures, and heritage values. The draft plan suggests a solid commitment to using climate science and Indigenous knowledgebased practices to preserve the archaeological record of the monuments cultural landscapes. Beyond this, the history written in the monuments landscapes provides opportunities for archaeological research, coupled with Indigenous knowledge, to provide data and insights into how people in the past dealt with challenges from climate change. Their reactions may help us understand how we will and should react to current climate challenges. The RMP and subsequent science plan should allow for continued responsible and collaborative research and inquiry into the archaeological record of Bears Ears.	CC01-General, CUL01-General, ALT07-Modification of Existing Alternatives	Chapter 2 establishes an interdisciplinary Traditional Knowledge Institute under the collaborative management of Tribal Nations and federal agencies that would encourage collaborative research. The Cultural Resources section generally provides for continued inquiry of the archaeological record in collaboration with the Bears Ears Commission and Tribal Nations.
14767-108	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The EIS failed to examine the current levels of warming already occurring and provide any description of the likely ramifications of hotter and drier climate on vegetation, water, soils or other resources. It also failed to provide an RMP that provides the direction, limitations and requirements to deal with impacts of climate change on the resources of the Monument. As an example, obviously there will be less water and less vegetation. Would these changes make the lands in the Monument more resilient or more fragile? How would that impact the BLMs status quo approach to the primary source of degradation within the Monument, livestock grazing? Does the RMP provide the direction, limitations and requirements to deal with impacts of climate change? The obvious answer is no.	CC01-General, DATA02-Inadequate Methodologies	In the Proposed Plan, there are management actions related to drought that could be affected by climate change and drought (Recreation and Visitor Services Section, Vegetation Section, and Livestock Grazing Section). The chapter on climate change addresses the impacts of the alternatives on greenhouse gas emissions as they contribute to climate change. Impacts from climate change are also described within the discussion of resources analyzed in Chapter 3. Climate impacts to vegetation are described in the Terrestrial Habitat and Vegetation Resilience and Conservation, Noxious Weeds and Nonnative Invasive Plants, and Forestry and Woodlands sections. Climate impacts to water are described in the Water Resources section. Climate impacts to soils are described in the Soils and Biological Crusts section.
14767-220	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	AMS 6.1 Temperature increases are expected to interact with water limitations to alter vegetation community composition and distribution but this is not reflected in any of the of the analyses or alternatives. The BLM proposes status quo livestock permitting despite its own statement.	CC01-General, DATA02-Inadequate Methodologies	Impacts to vegetation from climate change are discussed in the Terrestrial Habitat and Vegetation Resilience and Conservation sections of Chapter 3 and Appendix N.
17015-4	Kestrel Kunz	American Whitewater	Water Resources and Wild and Scenic Eligibility The planning area includes over 6,000 miles of streams or washes and over 16,600 acres of wetlands, which is a large amount for such an arid region. These streams, wetlands, and riparian areas sustain the entire landscape and many of the rivers and water bodies themselves are sacred to indigenous peoples or have cultural significance. Proclamation 10285 includes that the landscape itself is an object that needs protection, and water is an integral part of that landscape.6 As such, in coordination with Tribal interests, management actions in the planning area should protect or enhance water resources to the extent possible. The latest science and data on climate change should inform management of water and other resources in the planning area, from invasive species to reduced water quantity. The recognition of climate change and its impacts on the Bears Ears planning area is a key priority in the BEITC Land Management Plan and has not been addressed in all applicable sections of the RMP.	CC01-General, DATA02-Inadequate Methodologies	The chapter on climate change address the impacts of the alternatives on greenhouse gas emissions as they contribute to climate change. Impacts from climate change are also described within the discussion of resources analyzed in Chapter 3. Specifically, climate impacts to water are described in the Water Resources section of Appendix N. Additionally, collaboration with the BEC and Tribal Nations to proactively manage sites to effects that may be accelerated from climate change is included in the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
916-11	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Avoid the Unreasonable Use of Climate Change as a Reason to Eliminate Motorized Access and Motorized Recreation	CC01-General, DATA02-Inadequate Methodologies, TRAVEL01-General	As discussed in the Selection of the Preferred Alternative and Proposed Plan section, the agencies will select the management strategy that best accomplishes the purpose and need while protecting Monument objects.
18082-53	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Final EIS does not include a discussion of measures addressing the potential impacts of BLM-authorized activities on climate change (e.g., GHG emissions, carbon storage and sequestration). Section IV(H) of the Interim Guidance states, Agencies should consider mitigation, particularly avoidance and minimization, as early as possible in the development of their actions As part of early and meaningful public engagement, agencies should solicit public input on potential mitigation measures, including from communities that the proposed action and reasonable alternatives may affect. We recommend the Final EIS include management actions, including allocations, BMPs, and mitigation measures, to address climate change-related impacts from BLM-authorized activities.	CC01-General, DECI04-Mitigation and Monitoring	Climate change is considered in all resource analyses in the draft EIS, as well as discussed specifically in section Chapter 3. This analysis informs the decision of how the Monument will be managed. Review of management objectives to ensure nondegradation from authorized uses is part of BLM and Forest Service management directives. The agencies will be developing an implementation plan upon finalization of the RMP that outlines how RMP objectives will be met. Part of this plan will be identifying adaptive management thresholds for the resources and uses in the Monument. As applicable all implementation plans that require further analysis for step-down discretionary actions will follow applicable laws, such as NEPA and the NHPA, including opportunities for stakeholder involvement.
18082-50	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Environmental Consequences section, Table 3-146, evaluates the annual GHG emissions by source (livestock grazing, prescribed fires and vegetation management, and recreation and travel management) in metric tonnes per year for the No Action Alternative (p. 3-468). Based upon limited information in the Draft EIS, it is unclear whether the emissions inventory includes all or a subset of emission sources for the Monument. Section IV(D) of the Interim Guidance includes direction for calculating GHG emissions to evaluate the direct, indirect, and cumulative effects of a decision. In the Final EIS, we recommend the BLM produce a comprehensive GHG emissions inventory for BENM, including industrial point sources, non-point sources, mobile sources, area sources, and biogenic sources for existing emissions and for each of the alternatives, including the no action, to assess the potential impacts of BLM-authorized activities under each alternative and to assist the reader with understanding how decision-making regarding the various resources and uses could change those impacts. We also recommend identifying areas where assumptions were used to generate emissions estimates or where uncertainties exist. Then using this emissions inventory, we recommend the BLM update its Environmental Consequences analysis to include a discussion of the direct and indirect effects for each of the alternatives. Finally, using these emissions calculations, we recommend updating the social cost of carbon calculations for each of the alternatives.	CC02-Greenhouse Gas (GHG) emissions, DATA01-Analysis Methods and Data	An emissions inventory based on existing data on authorized activities was prepared. The emissions inventory is within the NEPA rule of reason, which allows agencies to determine, based on their expertise and experience, how to consider an environmental effect, and prepare analysis based on the best available information. These emission estimates are anticipated to be representative of both current conditions and conditions under the action alternatives evaluated in the RMP/EIS for most emissions-generating activities, based on limitations on resource uses in BENM under Proclamation 10285 and management alternatives described in the RMP/EIS. Changes in quantifiable emission estimates by RMP/EIS alternative are anticipated only for livestock grazing and are accounted for in the analyses contained in the RMP/EIS, within the Climate Change section. However, the analysis has been revised to be consistent with the finalized emissions inventory (US EPA 2023b) which provides a summary of methods, assumptions, and results.
18082-51	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	One page 3-465 of the Draft EIS, the BLM relied upon the February 2021 Social Cost of Greenhouse Gases Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990 developed by the Interagency Working Group on Social Cost of Greenhouse Gases, United States Government (IWG). This report has been recently updated by EPAs November 2023 Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances. This document improves upon the IWG methodologies for calculating SC-GHGs by incorporating more scientifically defensible discount rates which consider sources of uncertainty and more accurately reflect modern economic theory and climate change models. These updated discount rate values were also calibrated using global economic growth and inflation rates through the year 2080 and underwent an expert peer review process which made them consistent with the recommendations of the National Academies of Science, Engineering, and Medicine. We therefore recommend calculating SC-GHGs in the Final EIS using EPAs new discount rates summarized at the beginning of the November 2023 Report referred to above. To better assist lead agencies with the utilization of these updated estimates, the EPA has also recently released a Microsoft Excel Workbook for Applying SC-GHG Estimates v.1.0.1 spreadsheet which can be accessed at https://www.epa.gov/environmental-economics/scghg along with the updated report. This workbook presents a plug and play solution for converting project emissions estimates into SC-GHG evaluations. Please feel free to reach out to us directly if there are any follow up questions regarding these recent updates. We are also available to assist the BLM with using the workbook if desired.	CC02-Greenhouse Gas (GHG) emissions, DATA03-Suggest Additional Data Source	The BLM is following White House instructions from the "Memorandum from the Interagency Working Group on Social Cost of Greenhouse Gases" to use our "professional judgment to determine which estimates of the SC-GHG reflect the best available evidence." While the BLM is evaluating EPA's SC-GHG numbers we will continue to use the IWG interim SC-GHG values. https://www.whitehouse.gov/wp-content/uploads/2023/12/IWG-Memo-12.22.23.pdf
808-1	Art Shervs		Much like the impact of the Great Salt Lake's health on the Wasatch Front's climate and air quality, the management of Bear's Ears National Monument plays a critical role in surrounding areas – especially when tackling carbon sequestration issues. In short, carbon sequestration means capturing carbon emissions so they do not enter the atmosphere and further contribute to climate change. How we think about managing public lands plays a key role in limiting carbon emissions, ultimately benefiting our air quality and climate. Having intact wilderness allows for habitat and biodiversity to flourish, and the same with properly managing grazing areas.	CC03-Long-term Carbon Storage and Sequestration	The Climate Change section in Chapter 3 and Appendix N discusses the implications of management of resources above on carbon sequestration and impacts on climate change. The Proposed Plan was designed to be compatible with protection of Monument objects.
9061-4			The land use plan should take into account natures ability to absorb carbon and release oxygen while not wasting water resources as much as humans and their non-native cattle.	CC03-Long-term Carbon Storage and Sequestration, ALT05-Alternative E	For more information on air quality and climate change analysis and management, please see the climate change sections in Chapter 2, Chapter 3, and Appendix N of the Proposed RMP/Final EIS.

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14767-219	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	AMS 5.16 The AMS misses the primary factor impacting carbon storage, livestock grazing	CC03-Long-term Carbon Storage and Sequestration, DATA02-Inadequate Methodologies	The AMS and Final EIS collectively address livestock grazing's effect to climate change. See the grazing and climate change sections of the FEIS.
861-1	Art Hanson 1815 Briarwood Dr. Lansing, MI 48917		All of these reasons are why I support Alternative E for the Bears Ears Resource Management Plan. Through Indigenous knowledge, Alternative E strives to maintain best practices for the land of Bears Ears, while also allowing recreation in a sustainable manner- which includes closing off sensitive areas to recreation so that the local ecology can flourish and continue capturing regional carbon.	CC03-Long-term Carbon Storage and Sequestration, WILDFISH01-General	Thank you for your comment. Please see the Recreation and Visitor Services Section of the Proposed Plan.

Table U-8. Cultural Resources

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19017-11	Sylvia Stubbs	San Juan County	p.2-62 Cultural Resource Management Plan Alternatives Band E should include the Hole-In-the-Rock Foundation (or similar group) in the development of a Cultural Resource Management Plan. This group or groups would have historical knowledge on the Hole-In-The-Rock Trail, settlement of Bluff and other historic features and events that would be a part of this Plan.	CUL01; PUBL01	Thank you for your comment. The CRMP will be developed under implementation-level planning and is therefore beyond the scope of this NEPA effort.
19011-4	Elizabeth Merritt law@savingplaces.org	National Trust for Historic Preservation	As implementation of the Management Plan moves forward, it will be important to involve Tribal leaders directly in co-management of the National Monument. This includes the adoption of Tribal definitions of objects and resources that need special consideration, such as culturally important plants, wildlife, viewsheds, and landscape features.	CUL01; TIK01	Proclamation 10285 directs the agencies to meaningfully engage with the BEC, including by preparing and maintaining a management plan for the Monument, in order to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations.
19011-3	Elizabeth Merritt law@savingplaces.org	National Trust for Historic Preservation	In addition, it will be important to develop a travel management plan that will balance the needs of visitors while protecting the landscape, and protecting the spiritual and ceremonial practices of the Indigenous people who have longstanding cultural connections to the land.	CUL01; TRAVEL01	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments. See the Travel and Transportation Management section of the Proposed Plan for management actions related to travel and transportation. The Proposed Plan designates areas as OHV-closed or OHV-limited, using the best available data for the Planning Area. See the Cultural Resources section for a discussion of impacts on cultural resources from motorized use. See the Proposed Plan and the Recreation Appendix, which outline Recreation Area Management Plans that will be developed at the implementation level and will also include management and education strategies in order to protect Monument objects, including cultural resources. OHV routes will be designated as closed or open for OHV use under travel management planning. Interpretation plans would be developed for Cedar Mesa and BENM with an emphasis on education goals for sites allocated for specific uses.
12438-3	Josh Ewing PO Box 328 Bluff, UT 84512		Significant traffic by under-educated visitors to cultural sites, especially in easily accessible areas like the Comb Ridge, has dramatically affected many sites in the last five years. As a result, many sites have been denuded of artifacts, defaced by graffiti, and eroded by careless footsteps. Although the monument was originally designated in 2016 and high-traffic areas have been under continuous Monument designation since then, we still are no closer to a strategic visitor management plan that would provide direction and education to visitors to supplant the current management regime, where the Monument is effectively managed by Google rather than by the agencies in co-management with Tribes. Until a strategic cultural resources visitation plan is in place that proactively communicates with visitors about where we want them to go, we are essentially delegating management to the internet.	CUL01-General	See the Travel and Transportation Management section of the Proposed Plan. The Proposed Plan designates areas as OHV-closed or OHV-limited, using the best available data for the Planning Area. The Cultural Resources section of Chapter 3 discusses impacts on cultural resources from motorized use. See the Proposed Plan and the Recreation Appendix, which outline Recreation Area Management Plans that will be developed at the implementation level and will also include management and education strategies in order to protect Monument objects, including cultural resources. OHV routes will be designated as closed or open for OHV use under travel management planning. Interpretation plans would be developed for Cedar Mesa and BENM with an emphasis on education goals for sites allocated for specific uses.
14767-121	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	ES-21 Cultural resources are sensitive to incompatible uses when they can be easily accessed. Grazing can impact cultural resources through surface trampling, livestock wallowing, and establishment of livestock trails through important locations. In general, where grazing is designated as available/suitable, there is greater potential impact to such sites than in areas where grazing activity is limited or prohibited. Unfortunately, the DRMP fails to implement requirements or limitations to avoid these impacts.	CUL01-General	See the Proposed Plan for changes in areas unavailable to grazing in the Livestock Grazing section in Chapter 2. The potential impacts of grazing to the Cultural Resources, Archaeology, and History are presented in their respective sections in Appendix N.
14767-167	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	BMPs are measures applied on a site-specific basis to reduce or eliminate adverse impacts. For any proposed activities in the Planning Area, appropriate BMPs would be selected on a case-by-case basis to meet the site-specific requirements of the project and local environment from the list of BMPs provided in Appendix G This assumption is false on many fronts. First, as discussed above, changes to permit terms and conditions are as rare as the proverbial teeth of hens. Next, the BLM exempts livestock grazing with the use of proposed activities not continuing activities. Further, neither the DRMP nor Appendix G makes applying BMPs mandatory. Well, lets look at Appendix G. Setting aside that everything in Appendix G is optional, Section 1.2, dealing with cultural resources, simply suggests implementation of the BLMs normal NHPA duties. As discussed earlier, the NHPA is not a protection	CUL01-General	Application of BMPs would occur at project implementation level analysis. The BMPs provide direction on how the agencies would handles certain scenarios in the application of implementation level actions. BMPs provide some best management practices depending on results of implementation level analysis and decisions, that will follow all applicable law, regulation and policy. Section 106 (now 54 USC 306108) of the NHPA is a procedural requirement under the statute. The NHPA, however has multiple provisions, some of which do mandate the agencies to preserve historic properties.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			statute, its merely an analysis statute, like NEPA. None of the 12 supposed BMPs actually protect cultural resources. In fact, most admit that damage to cultural resources will occur, like #1, #2, #3, #4. Where proposed projects or development will adversely affect a cultural resource, testing, data recovery, or full excavation to recover scientific information may be required as mitigation. The applicant or operator bears the full cost of mitigation and is encouraged to consider avoiding adverse effects through project relocation or redesign rather than mitigating adverse effects. The applicant or operators will also be responsible for the costs of consultation with Tribal cultural advisors in addition to contract archaeologists. The agencies will consult with Tribes prior to cultural resources testing or data recovery consistent with existing agency policy So the BLM is admitting, as they would in a multiple use RMP that they are prioritizing resource extraction over protection. How would adversely impacting cultural resources be protecting cultural resources.		
16994-4	Susy Ellison		Derogatory names of places and objects should be removed. We have plenty of Squaw Canyons that need new names! This special landscape deserves better.	CUL01-General	The Proposed Plan would address derogatory names through the Co-Stewardship implementation level plan, developed in collaboration with the BEC and other Tribal Nations. Changing the geographic names of natural features, as opposed to the names of agency-designated areas, is a function of the U.S. Board on Geographic Names.
1826-2	George and Frances Alderson 112 Hilton Ave. Catonsville, MD 21228		The new plan should identify cultural sites that need to be preserved and provide for tribal uses of cultural and heritage value. Federal funding should be provided to support full-time Tribal management staff to collaborate with BLM and FS managers.	CUL01-General	Ongoing cultural resources inventory would occur under the Proposed Plan. Priorities for inventory would be established in the CRMP, developed in collaboration with the BEC and Tribal Nations, that would be required under the Proposed Plan.
1906-12	Morgan Sjogren		Paleontologists should be able to procure permits to collect and study fossils within the monument.	CUL01-General	See changes to Paleontological resources provided in the Paleontological Resources section of the Proposed Plan, Chapter 2. These include the ability for collection and study of fossils with a permit.
1906-7	Morgan Sjogren		Tribes need to be consulted for the removal of derogatory place names within the monument.	CUL01-General	The Proposed Plan would address derogatory names through the Co-Stewardship implementation level plan, developed in collaboration with the BEC and other Tribal Nations. Changing the geographic names of natural features, as opposed to the names of agency-designated areas, is a function of the U.S. Board on Geographic Names.
2026-2	Ainsley Cathcart		The Bears Ears region holds deep cultural, historical, and spiritual significance for these Tribes. For centuries, they have inhabited and cared for this land, utilizing their Traditional Indigenous Knowledge to live sustainably and in harmony with the natural environment. It is crucial that their expertise and stewardship are central to the management of Bears Ears National Monument.	CUL01-General	The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations.
3110-1	Shauna Archer 6277 West Freedom Hill Way Herriman, UT 84069		This is important land to the native tribes. Co-management with the tribes is important factor. Native tribes have managed our lands for thousands of years, this is knowledge that should be included.	CUL01-General	The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations.
544-2	Please don't be cowed by ranchers		For all human uses, and especially domestic livestock grazing, it is crucial that soil disturbance be reduced as much as possible. This is necessary to protect soils and biological soil crusts, and discourage the colonization and spread of harmful cheatgrass and other alien plants. These invasive plants alter fuel patterns and fire behavior and these changes make natural or human caused fires much more destructive. These fires can then threaten other monument objects including cultural resources.	CUL01-General	See the Proposed Plan regarding livestock grazing provided in the Livestock Grazing section in Chapter 2. See the Proposed Plan regarding Soil Resources provided in the Soil Resources section in Chapter 2. See the Proposed Plan regarding vegetation provided in the Vegetation section in Chapter 2. The potential impacts of those alternatives to Cultural Resources Management, Archaeology Sites, and Historic Resources are provided in their respective Affected Environment Sections within Appendix N. The agencies have included actions in vegetation, livestock grazing and soil resources to protect BENM objects.
583-1	David Siegel PO BOX 65658 Albuquerque, NM 87193		The Draft RMP-EIS uses the Abbreviation "TCP" (Traditional Cultural Property), but TCP is not included in the list of Abbreviations. This is less important than the overriding fact that TCP is not codified in law or regulation by that name. It is not the authorized legal term. The correct legal term is: "Properties of traditional religious and cultural importance to an Indian tribe [or Native Hawaiian organization]" Section 101 (d)(6)(A) under "Establish program and regulations to assist Indian tribes", in the National Historic Preservation Act as amended in 1992 This might seem like a distinction without a difference, but it is actually quite important to get the terminology right, especially for an area like Bears Ears. That is because Congress acted exclusively and expressly on behalf of Indian tribes [and NHOs] in the 1992 amendment. The amendment became a statutory part of "Indian Law", but it has never been codified in any implementing regulations as Congress intended, and it is not used at all in the Bears Ears RMP-EIS. I believe BLM is remiss in overlooking the true Congressional intent for tribes, and substituting the NPS guideline (TCP) which is much less effective toward protecting the reserved rights of tribes. Since 1990, the National Park Service has invented and promoted the term "TCP", which was and is still only a guideline that NPS encourages all agencies to use. NPS exceeded the act of Congress by expanding the TCP guideline to include properties of cultural importance to ANY sector of society - not just tribes. "TCP" is just a guideline but it is not the correct, codified term, and its' use encroaches on the emphasis Congress intended to give to properties of importance to tribes, thereby lessening the full significance of the 1992 amendment, and diluting its' weight and force on behalf of the reserved rights of tribes. Suggestion: the term "TCP" should be stricken from the RMP-EIS, and replaced with the proper statutory term: "Properties of traditional religious and cultural importance to an Indian tribe" (PTRCIT). Granted, that is harder to say than "TCP", but it is what Congress expressly intended for tribes in 1992.	CUL01-General	Congress charged the National Park Service with promulgating regulations for the National Register of Historic Place in the National Historic Preservation Act. Those regulations are at 36 CFR Part 60. The National Park Service has provided additional guidance on the evaluation of Traditional Cultural Properties in National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties. The definition for TCPs in this plan is in line with this guidance

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609-1	Allie White		I am in support of alternative E since this plan has the most input from the tribal nations incorporated into the ideas and actions.	CUL01-General	The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations.
701-2	Lane Palmer		The restrictions proposed in the new management plans also threaten to sever the deep-rooted connections Native American communities have with these lands, impacting their cultural, spiritual, and practical uses of the area.	CUL01-General	The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations.
8732-12	Susan Markley PhD, FL		Cultural Resources Management Plan: Should adopt Tribal definitions of Monument objects and resources, to include not just archaeological sites, but also culturally important plants, riparian areas, culturally important wildlife, and intangibles such as viewsheds, soundscapes, and more.	CUL01-General	A CRMP, developed in collaboration with BEC and Tribal Nations, would be required under the Proposed Plan.
8732-7	Susan Markley PhD, FL		Derogatory names of places and objects in the Monument must be removed.	CUL01-General	The Proposed Plan would address derogatory names through the Co-Stewardship implementation level plan, developed in collaboration with the BEC and other Tribal Nations. Changing the geographic names of natural features, as opposed to the names of agency-designated areas, is a function of the U.S. Board on Geographic Names.
8986-5	Britt Hornsby 190 N 3rd East Unit #1 Bluff, UT 84512	Town of Bluff	Bluff would like to see protective measures for the cultural sites in Butler Wash for both visitor impact and grazing damage mitigation. We support proactive measures like digital and physical fencing, minor visitor services like toilets and Visit With Respect signage, and closing sites that are being overly damaged (asking visitors to view from a distance). Bluff fully supports the Earth-Sky based framework for cultural sites in BENM.	CUL01-General	Under the Proposed Plan, Agencies would collaborate with the BEC and Tribal Nations to develop interpretive messages and educational materials that tell the history of BENM from the Tribal Nations perspective and their relationship to these sacred lands. The Proposed Plan also has management actions for working with Tribal Nations (not just the BEC) to develop cultural sensitivity trainings. The Proposed Plan also includes management actions to protect cultural resources from recreation visitation in the Cultural Resources and Recreation Section within Chapter 2. These include not allowing climbing equipment to access cultural resources, prohibition of target shooting in BENM, encouraging hiking on designated or existing trails, not allowing visitors into the interior rooms of structural cultural sites etc.
9353-2	Larry Beane		The area is rich with archaeology, artifacts at risk and petroglyphs. Resource extraction such as petroleum, coal, uranium, Lithium, copper, and others must avoid all archaeological sites and impacts. The oil exploration thumpers and blasting for seismic mapping causes damage to rock faces containing petroglyphs, cave collapses, and rockfalls, not to mention potential changes to underground hydrology.	CUL01-General	Impacts from specific actions would be considered during project-specific implementation analysis. Additionally, under the Proposed Plan, the agencies would manage any operations that occur under the mineral leasing laws pursuant to valid existing rights in a manner that protects and mitigates impacts to the preservation, restoration, and protection of BENM objects. BENM is withdrawn from mineral entry by Presidential Proclamation.
18302-2	Joe Jones		several points about development of a Cultural Resources Management Plan: This should adopt Tribal definitions of Monument objects and resources, to include not just archaeological sites, but also culturally important plants, riparian areas, culturally important wildlife, and intangibles such as viewsheds, soundscapes, and more.	CUL01-General, ALT05-Alternative E	A CRMP, developed in collaboration with BEC and Tribal Nations, would be required under the Proposed Plan. The Proposed Plan requires that in the Cultural Resource Management Plan the agencies collaborate with the BEC and Tribal Nations on the identification of cultural resources.
14265-4	Korina Rigglin		The removal of all derogatory names should be implemented,	CUL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan would address derogatory names through the Co-Stewardship implementation level plan, developed in collaboration with the BEC and other Tribal Nations. Changing the geographic names of natural features, as opposed to the names of agency-designated areas, is a function of the U.S. Board on Geographic Names.
3865-1	Elaine C. Erb		Of all the alternatives, I believe that version E is the best. However, I think some improvements can be made. First and foremost is ensuring that the people's for whom this is their homeland have high level of access and accountability on this land.	CUL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations.
7339-3			Cultural Resources Management Plan: Should adopt Tribal definitions of Monument objects and resources, to include not just archaeological sites, but also culturally important plants, riparian areas, culturally important wildlife, and intangibles such as viewsheds, soundscapes, and more. Administer additional protections to ancestral lands through conserving animal migration corridors and habitats to ensure that wildlife can thrive and hunting and fishing will continue for generations to come. This involves balancing the needs of the recreation community, regional communities, and other stakeholder groups with respect for the spiritual and ceremonial practice of Indigenous people who have lived on this land since time immemorial. Derogatory names of places and objects in the Monument must be removed.	CUL01-General, ALT07-Modification of Existing Alternatives	A CRMP, developed in collaboration with BEC and Tribal Nations, would be required under the Proposed Plan. See the Cultural Resources Section in Chapter 2 for what would be included in the CRMP. Additionally, the Proposed Plan would address derogatory names through the Co-Stewardship implementation level plan, developed in collaboration with the BEC and other Tribal Nations. Changing the geographic names of natural features, as opposed to the names of agency-designated areas, is a function of the U.S. Board on Geographic Names.
18927-1	Daniel Kent 399 E 100N Moab, UT 84532	Friends of the Abajos	To that end, it is important, first and foremost, to phase out the two most deleterious impacts to this landscape, toxic extractive industries, including oil and gas and mining, and cattle ranching. In part to protect the archeological resource, there are already many sensible restraints on extraction, but cattle grazing has actually become worse since the monument designation, and with most of this land still open to cattle grazing, things could still greatly deteriorate.	CUL01-General, ALT07-Modification of Existing Alternatives, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Additionally, under the Proposed Plan, the agencies would manage any operations that occur under the mineral leasing laws pursuant to valid existing rights in a manner that protects and mitigates impacts to the preservation, restoration, and protection of BENM objects. BENM is withdrawn from mineral entry by Presidential Proclamation.
18677-7	Benjamin Bellorado Tucson, AZ		Once an option is selected for the management plan, I suggest the development of specific processes for western scientists, particularly archaeologists and anthropologists, to follow to obtain permission from the BEC and Federal Land Managers to conduct scientific research in the monument. So far, I have not been able to find any specifics about the process that these groups would be able to follow to continue their work in the area. Will consultation be required to do any field, lab, or collections work on monument objects, only for major projects? Will researchers need to conduct formal consultation with all 32 federally recognized tribes with connections to the monument, or just the five	CUL01-General, ARC01-General, PALEOGEO02-Related to research communities, local communities, and visitor experience	Under the Proposed Plan in the Paleontological Resources section in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The Proposed Plan also has a paleontological resource and cultural resource implementation level plans which would include education and outreach to local communities.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			in the BEC? Will there be funding to undertake these efforts? Are collaborative efforts sufficient? What about existing projects and publications in the process of being written or published, are consultations needed for these? How does work that also includes Natural Bridges National Monument, an NPS unit, be integrated into the efforts of BENM? Will students and universities have a venue through which to get funding for consultation and collaborative projects? How do we move forward? The existing ambiguity around these topics is generating elevated levels of anxiety within archaeological circles about the future of research in the BENM area. Having clearly outlined processes and procedures for continuing our work would greatly alleviate much of this anxiety and allow archaeologists working in the area to more fully support and promote the mission of BENM and its new management plan.		
12746-18	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	The Organizations are intimately familiar with the management of cultural/historic values on public lands, and as a result we will clarify we are not asking for any site-specic information that would be protected based on the value of the site as a cultural resource. We are aware that significant information could still be provided without site specic information. We have participated in planning that: 1. Merely mapped Low/medium/high cultural values; 2. Other efforts have outlined what is cultural information already publicly available; 3. Some plans have provided information on areas already inventoried; and 4. Other plans outline what locations have been found suitable for listing on the National Register of Historic places, what locations were applied to protection and found suitable, what areas have not been inventoried at all. We are unable to locate any information such as cultural information we have seen previously and are forced to conclude that all sites and possible sites were valued above all other opportunities and protected. Even with this type of maximum protection assumption for cultural sites, we are unable to theorize what protections would be for cultural landscapes. NEPA requires this information and decision-making process to be analyzed. Prior to addressing the complete lack of compliance with NEPA requirements, APA compliance must be addressed as the Proclamation sought to create a new rule under the Antiquities Act to implement that authority, the Proposal is insufficient to satisfy administrative Procedure Act requirements. Courts have consistently applied the following standards for rulemaking by agencies: Procedure, not substance, is what most distinguishes our government from others. In the not-so-distant past, a government agency in the Soviet Union could impose controls on the production of commodities without bothering to involve the public in the decision making process. By contrast, a government agency in the United States must usually give notice to, and accept comments from, the public before undertaking to place manacles on the invisible hand. 5 U.S.C. 55318	CUL01-General, DATA01-Analysis Methods and Data, DECI07-Compliance with other laws and policies	Thank you for your comment. The Cultural Resources section of the Proposed Plan in Chapter 2 includes cultural sites allocated as Public Use Developed. Analysis of potential impacts from alternatives, including site counts where available, are presented for Cultural Resources in the Cultural Resources, Archaeology, and History Sections in Chapter 3. Appendix O provides detailed description of the consultation, coordination, and public involvement efforts during the RMP/EIS planning effort.
889-33	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The BLM likewise concluded in 2010 that the Arch Canyon route was not causing adverse effects to cultural resources: The conclusion reached in the Staff Report is that motorized vehicle use along the designated route within Arch Canyon is not causing considerable adverse effects to cultural resources. Some adverse effects to cultural sites from human activities have been identified in Arch Canyon; however, the sites have not lost their significance in terms of their eligibility for listing in the National Register of Historic Places and therefore the effects are not found to be considerable. Almost all of the adverse effects that were identified are a result of activities that took place years and even decades ago and such effects cannot be attributed to OHV use. The effects are minimal in the upper portions of Arch Canyon and are more pronounced toward the mouth of the canyon. The route crosses one significant site in an area of sparse artifact distribution and no subsurface features or deposits; however, travel on this section of the route is not adversely affecting the sites values. ²⁴ The DEIS cites no new information or changed circumstances to prove that motorized use on the Arch Canyon road is now causing any adverse effects to cultural sites. Indeed most cultural sites in Arch Canyon are located high on the cliffs above the road and are completely inaccessible without technical rock climbing. Thus it would be impossible for motorized vehicles traveling the road at the bottom of the canyon to harm them. Closing the road based on unproven allegations of adverse impacts to cultural sites would therefore also be contrary to the facts in the record and arbitrary and capricious.	CUL01-General, DATA02-Inadequate Methodologies	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
12746-19	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	While a cultural site is defined in the Proposal a cultural landscape is not defined in the Proposal, which creates immense problems when NEPA sufficiency is addressed. The need for a single definition as a starting point of analysis for a cultural landscape is critical as many different organizations have created definitions for this, and often, these are significantly different. We are aware that UNESCO, The European Landscape Convention Treaty, the National Park Service, and the City of San Diego all have separate and distinct definitions they apply. There is extensive scholarly discussion on the proper definition of a landscape even is. ²⁰ Most definitions have varying factors and values to be protected and some classes of cultural landscapes have high levels of human activity across the entirety of the landscape. Without defining a cultural landscape, we are unable to define its value in comparison to other values identified as important in the Proclamation for NEPA. Other basic questions such as: Is a cultural site more important than a cultural landscape? What uses might be consistent with a cultural landscape but not a cultural site? Is the Proposal managing cultural landscapes under a single standard or multiple categories simply cannot be addressed. These questions are not academic but critical to the foundation of the planning effort. The need for a basic definition of a cultural landscape as a starting point in the NEPA planning process is directly	CUL01-General, DATA02-Inadequate Methodologies	See regulations for the National Register of Historic places promulgated by the National Park Services, specifically see 36 CFR Part 60 and further guidance in National Register Bulletin 18 https://www.nps.gov/subjects/nationalregister/upload/NRB18-Complete.pdf . The guidance states that a cultural landscape is, "a geographic area (including both cultural and natural resources and the wildlife or domestic animals therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." Proclamation 10285 notes that cultural landscapes are important objects of the Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			evidenced by the fact a cultural landscape, as defined by UNESCO, encompasses wide-ranging uses of the landscape.		
18082-6	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Resources with cultural and religious significance to any Tribal communities should be identified at the discretion of the Tribe.	CUL01-General, DATA02-Inadequate Methodologies	Ongoing cultural resources inventory would occur under all alternatives. Priorities for inventory would be established in the Cultural Resource Management Plan, developed in collaboration with the BEC and Tribal Nations, that would be required under the Proposed Plan, See the Management Actions Common to All Action Alternatives section in the Cultural Resources section within Chapter 2. The Proposed Plan requires that in the Cultural Resource Management Plan the agencies collaborate with the BEC and Tribal Nations on the identification of cultural resources.
15381-15	Sagebrush Habitat Conservation Fund		3.5.2.1. AFFECTED ENVIRONMENT (Archaeology Sites) This section provides a nice, encyclopedic description of the various cultures that have occupied the Monument through time. It provides truly little in terms of the actual sites, Monument objects. The description of the affected environment should disclose the number of sites inventoried, the number of sites eligible for listing on the National Register of Historic Places and number of listed sites. There should also be an accounting for the number of sites that have experienced adverse effects and the cause of adverse effects. Such information would provide much more useful information to the public and decision maker. All this information can be retrieved from the Utah State Division of History and the Intermountain Antiquities Computer System (IMACS).	CUL01-General, DATA03-Suggest Additional Data Source	Analysis of potential impacts to archaeological sites under each alternative, including site counts, are provided in the Archaeology Sites section of Chapter 3.The agencies are also conducting Section 106 review of potential effects to historic properties from the Proposed Plan.
16370-5	Wayne Hoskisson		If I recall correctly Mark Maryboy performed extensive cultural surveys of the Bears Ears region. If those are available they should be included in any analysis. Since Mr. Maryboy was instrumental in the campaign to designate the BENM he should be easy to locate.	CUL01-General, DATA03-Suggest Additional Data Source	Analysis of potential impacts was conducted using cultural resources survey data provided by the agencies and included all formally documented archaeological sites located within the Monument boundaries. The Proposed Plan analysis also incorporates publicly available and some publicly unavailable data into the analysis.
17617-17	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	it is crucial to distinguish between religious and cultural activities. While the agencies use the terms "religious" and "cultural" interchangeably, they are not synonymous. Cultural activities encompass a broad range of practices, traditions, and expressions that define the identity and heritage of a community. These activities can include storytelling, art, traditional ceremonies, and the use of medicinal plants. On the other hand, religious activities relate to spiritual beliefs and practices, including rituals, worship, and other expressions of faith. The conflation of these terms can lead to misunderstandings and diminish the significance of cultural practices that are not necessarily religious. Therefore, we respectfully request that the BLM & USFS clearly distinguish between religion and culture when describing cultural activities. This change will ensure that Indigenous communities' unique and diverse cultural practices are accurately represented and respected.	CUL01-General, EDIT01-tech edits needed in the EIS	Thank you for the comment. The term cultural typically encompasses religion, generally speaking. Agency law, regulation and policy address both cultural and religious concepts under various paradigms.
8992-4	Olivia Juarez 1919 14th St, Suite 700 Boulder, CO 80302	GreenLatinos	In the spirit of Bears Ears being the common shared name for the buttes across many languages, we encourage the BEC and agencies to include interpretation about more place-names across languages in the natural history program developed at the interdisciplinary Traditional Knowledge Institute. For example, indigenous place names for numerous mesas, gulches, canyons, rivers, springs, cultural sites, woodlands, and more should be recognized in any site-specific interpretative material. Multi-language names for the San Juan River should be recognized in the San Juan River cultural resources management plan and at interpretive sites related to the river including on site-locations, off-site locations, or overlooks. The San Juan River has many other names in several indigenous languages. In Din it is known as Sa Bitoooh (Old Age River), Toooh Bikai, (Male Water), Bitsiis Nineezi (One with Long Body), Bitsiis Nteeli (One with Wide Body), and Nooda i Bito (Utes River). Ute peoples call it River Flowing From the Sunrise among other names. The currently used name, San Juan River, was given by Spaniards who later encountered the region. The first Spaniards to encounter the region, the Dominguez-Escalante party, called this river the Navajo River. We support the recognition of numerous place names for any site in the monument in interpretive materials, and encourage education about place names given by Spanish peoples in order to acknowledge this crucial story of Hispanic heritage that defines part of the monuments boundary. Any of the above suggested storytelling opportunities interpreted at front-country and on-site interpretation resources should be translated into Spanish to ensure that Hispanic/ Latino histories in the monument are interpreted in a culturally competent manner and foster a sense of welcoming for the nations fast-growing Hispanic/Latino population.	CUL01-General, EJSOC01-General	Content used for educational purposes will be developed at the implementation stage. Language has been added to the Cross Cultural Education and Outreach Section, similar to the Recreation Use and Visitor Services Section, regarding universal design, including accessibility through use of multiple languages. See the Cross Cultural Education and Outreach Section in Chapter 2.
14767-158	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	None of the bullet points for the CRMP actually require protection from the primary source of cultural resource degradation, livestock grazing. Unauthorized use of domestic pets and pack animals would not be allowed in cultural resource areas (including archaeological resources) except for historic roads and trails. Where problems occur, the agencies would evaluate posting signs to notify visitors of restrictions and explore protective measures like leash requirements. So a 20 pound dog is a major threat to archi resources, but any number of 1,400 pound cows are just fine, in the BLMs blindered view. There is no requirement for Class III surveys, so the vast majority of cultural resources can be degraded and destroyed simply by avoiding knowing about it. On page 2-115, we see the same thing. Pets must be leashed but cows can wander wherever they please. Pets are prohibited from swimming in springs, potholes, or other natural water sources. Pet waste disposal requirements are identical to human waste disposal requirements. Pets are prohibited from entering or touching Monument objects, such as but not limited to dwelling or storage structures, relict plant communities, and	CUL01-General, GRAZ01-General	As demonstrated by the effects analysis in the Cultural Resources and Archaeological Sites effects section in Chapter 3, the agencies took a hard look at the impacts of livestock grazing across a range of alternatives. The agencies' analysis is based on best available science and is commensurate with the importance of the potential impacts on BENM objects, including cultural resources. Cultural resources are objects within BENM, as identified in Proclamation 10285. In accordance with the Proclamation, the Livestock Grazing section in Chapter 2 requires the agencies to manage livestock grazing in a manner consistent with the protection of Monument objects. If monitoring indicates that domestic livestock grazing is adversely impacting BENM objects, including cultural resources, the BLM will take appropriate measures to mitigate those impacts in a manner that ensures protection of the objects. Also, the Livestock Grazing section Chapter 2 section identifies areas that are unavailable to livestock grazing to

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			habitat for culturally important species. Cows can swim in springs, potholes and other waters, but pets can't? Why? Dog shit must be collected, but cows can shit wherever they like. Why? Pets are prohibited from touching objects but cows are completely allowed. Why? This is purely arbitrary decision making.		protect locations with sensitive historical and cultural resources. See changes in the Proposed Plan for management of Pets.
18696-5	Julian Soncco		Give greater consideration to Tribal recommendations on decisions regarding grazing as Tribal members have grazed the lands for several hundred years while maintaining a unique environment. Please explore permitting authority to Ute and Navajo Nation Tribal members as they have grazed Bears Ears for hundreds of years as it is traditional practice based on the standards of Traditional Ecological Knowledge -Funding should be allocated for projects involving cultural education services for Tribes to develop curriculum and educational materials. Funding should be allocated to developing Tribal ranger initiatives as an alternative to enforcement services from the Federal agencies	CUL01-General, GRAZ01-General	Information regarding Livestock and Grazing is provided in the Livestock Grazing Section of the Proposed Plan in Chapter 2. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable. See also the Cross-Cultural Education and Outreach section within the Proposed Plan in Chapter 2.
18605-4	Susan Shoemaker		Also, as visitation grows - so does the impact from people not aware of archaeological site etiquette and damage to our cultural resources. I support funding educational programs and monitoring of our wonderful resources.	CUL01-General, PALEOGE001-General	Under the Proposed Plan the agencies would collaborate with the BEC to develop a comprehensive interpretive plan for BENM. See Cross Cultural Education and Outreach within the Proposed Plan in Chapter 2.
12832-8	Jason Keith 243 Aspen Avenue Moab, UT 84532	American Mountain Guides Association	Because of the importance of Indian Creek to the climbing community, we encourage the Agencies and BEC to ensure that the guided public has adequate opportunities to experience this special landscape through the guidance of a professional outfitter that has benefited from cultural sensitivity training. In order for this valuable training and education to be passed on to the public, it will be necessary for implementation-level planners to increase or maintain the number of SRP holders and allocated service days for guided rock climbing.	CUL01-General, REC01-General, ALT05-Alternative E	SRPs and SUPs will be issued as a discretionary action to meet Monument management objectives. The Proposed Plan has management actions towards SRPs under the Recreation Section. In the Proposed Plan, in the Cross Cultural Education section, there is collaboration with the BEC to provide cultural sensitivity training to SRP holders.
908-4	Lawrence Stoker Las Vegas, NV		Page 2-115 states: "Any new climbing routes that require the placement of bolts, anchors or fixed gear requires approval from the agencies, who would work collaboratively with the BEC..." While climbers appreciate that climbing is recognized as a valid use of land, the onerous anchor approval process is a non-starter. This kind of policy shut down all new routing at City of Rocks, ID. Most climbers will seldom stray away from already developed routes. However, there is still vast potential for more routes. Putting up new routes is in many ways a religious experience, influencing both body and the soul. Unfortunately, Alternative Es process will effectively prohibit all new routes, and null that experience for generations to come. I understand the importance of protecting cultural resources in the same vicinity. A more effective plan would be to identify the resources up front, rope them off, or otherwise mark them. Most responsible recreationalists will avoid touching and damaging cultural resources. I urge the BLM to not manage to the lowest common denominator and to find other ways to protect cultural resources.	CUL01-General, REC03-Dispersed Recreation (where there are no formal recreational facilities)	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new climbing routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
19015-1	Linda Patterson cactuschic@gmail.com		Traditional cultural grazing and traditional cultural grazing allotments were not singled out to be protected under the Proclamation 10285, But there are other applicable laws and regulations and policies regarding the traditional cultural practice of cattle grazing and grazing allotments that should have been addressed in the draft RMP. Some of these applicable laws that protect the traditional cultural practice of cattle grazing and grazing allotments are: * THE NATIONAL HISTORIC PRESERVATION ACT OF 1966 (NHPA) * THE NH PA'S IMPLEMENTING REGULATIONS AT 36 C.F.R. SS 800 PART B, ALSO KNOW AT THE SECTION 106 PROCESS * THE AGENCIES' VARIOUS MANUALS, INSTRUCTION MEMORANDA, ETC.	CUL02; DECI07; GRAZ01	While livestock grazing is a use noted in the Proclamation, it is not itself an object.. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources section in Chapter 2.
19015-3	Linda Patterson cactuschic@gmail.com		Grazing is how our families have always made a living. Some of my children, nieces and nephews are continuing this tradition. It is our culture, and it should be protected as a cultural, historic, traditional use within the monument, under any applicable laws. The cultural grazing traditions and the cultural traditional grazing allotments should have been analyzed in the Draft RMP. The SEC should not have co-management of anything to do with grazing or grazing allotments or what forage is allocated for livestock. The BEC was formed because of the cultural, religious traditions of the Native Americans. To give them co-management and authority over my cultural, traditions and the way I make my living is elevating one religion over another or elevating one culture over another.	CUL02; GRAZ01	Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Service's cooperative agreement with the BEC. The permit holder is always included when making decisions about their permits. In addition, Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, subject to existing laws and regulations. These regulations require coordination and consultation with interested publics and governmental agencies.
17409-1	Sophie Huss		This must be followed by additional protections to ancestral lands through conserving animal migration corridors and habitats to ensure that wildlife can thrive and hunting and fishing will continue for generations to come. This involves balancing the needs of the recreation community, regional communities, and other stakeholder groups with respect for the spiritual and ceremonial practice of Indigenous people who have lived on this land since time immemorial.	CUL02-Traditional, Religious, or Cultural Use	Information regarding Wildlife and Fisheries is provided in the Wildlife and Fisheries section in the Proposed Plan includes coordination with the BEC regarding wildlife. Implementation Plans, included RAMPs, will be developed following this plan, which will seek to protect objects, including wildlife and cultural resources from recreational use.
17573-67	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Finally, the agencies should give more consideration to how travel management goals, objectives, and actions may impact the ability of Indigenous people to engage in ceremonial practices, cultural traditions, and economic activities that sustain daily living and are protected by the monument. Roads allow them to reach areas where things like game animals can be hunted and medicinal herbs and firewood can be collected within reasonable walking distances from parked motorized vehicles. Areas closed to OHV travel by the RMP will impose limitations in the near future, and the subsequent travel management planning process is bound to close many roads that are critical to engaging in	CUL02-Traditional, Religious, or Cultural Use	See the Environmental Justice section in Chapter 3 for a discussion of impacts to local communities from travel and transportation management. See Appendix O for a discussion on Consultation and Coordination engagement with Tribal Nations to determine impacts on Indigenous communities. The Proposed Plan would result in fewer miles of routes being closed as a result of area designations than Alternative D.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			significant cultural practices. Potential OHV closures under Alternative D will severely restrict motorized travel.		
18713-2	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	This plan should implement public use of these lands in a way which more wholly considers its sacredness. Per the American Indian Religious Freedom Act of 1978 (AIRFA) (42 U.S.C. 1996.) protects the rights of Native Americans to exercise their traditional religions by ensuring access to sites, use and possession of sacred objects, and the freedom to worship through ceremonies and traditional rites. It is therefore a legal responsibility of the BLM to protect Tribes the character of the sacred sites held within Bears Ears and maintain Tribes access to these sites. Models for this exist on other public lands (See Puuhonua o Honaunau National Historic Park where recreation, swimming, and sunbathing are not allowed due to the respect this location is held in by local Tribes.) It might be appropriate to recognize Bears Ears National Monument (BENM) as a religious place managed by the federal government and to recognize and restore this role.	CUL02-Traditional, Religious, or Cultural Use	The Proposed Plan would allow for cultural and traditional uses, as well as for subsistence practices.
1906-4	Morgan Sjogren		Agencies should work with Tribes on a route-by-route assessment for changes to the travel system to emphasize conservation measures and protection of cultural resources. On the San Juan River protection of cultural resources needs to be prioritized over increased use. Tribal perspectives of significant cultural sites are not limited to archaeological sites but also include culturally important plants, springs, riparian areas, and wildlife. This also includes viewsheds, soundscapes, dark skies, and air quality. These should be adopted and protected as Monument objects within the RMP. Tribes consider entire landscapes places of worship, and management needs to work directly with the Tribal Commission to manage the monument with this in mind.	CUL02-Traditional, Religious, or Cultural Use	See the Transportation and Travel Management Section of the Proposed Plan which was developed in collaboration with the BEC and Tribal Nations. The Proposed Plan is written in accordance with Proclamation 9558 and 10285, which include the description of Monument objects and the Proposed Plan protects those objects, including cultural resources. In the Proposed Plan, cultural resources include wildlife, springs, water, and other resources important to Tribal Nations.
897-1	Angela Marian		Cultural Practices: For many families, practices such as hunting, fishing, and horseback riding are inegral to their way of life. These practices are often tied to the land and the seasons, forming an important part of family traditions and local culture. Restrictions to do so can mean a loss of cultural heritage and a disconnect from practices that have been passed down through generations.	CUL02-Traditional, Religious, or Cultural Use	A principal goal of the Proposed Plan regarding Cultural Resources is to ensure that BENM resources important for cultural and traditional needs, as well as for subsistence practices and economic support of Tribal communities, are available and sustainable. Many activities including hunting, fishing, and horseback riding would be allowed under the Proposed Plan with certain restrictions for different activities. See the Recreation section in the Proposed Plan for specific restrictions on activities.
17130-5	Carly Webster Moab, UT 84532		More education needs to be provided to visitors for them to understand the importance of preserving these sacred sites and resources, as well as how to visit them with respect. Managing these sites should include strict language and enforcement of Alternative E's guidelines about permits, camping, staying on trails, etc. We must build a robust budget to hire rangers to patrol and protect these sites, as well as educate visitors to the area. Some interpretive patrol would also increase the enjoyment for some visitors at certain sites with high visitation.	CUL02-Traditional, Religious, or Cultural Use, ALT05-Alternative E	The Proposed Plan addresses Cross Cultural Education and Outreach.
17807-5	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	. Allowance for healing celebration by indigenous communities and individuals at BENM	CUL02-Traditional, Religious, or Cultural Use, ALT05-Alternative E	The Proposed Plan would allow for cultural and traditional needs, as well as for subsistence practices and economic support of Tribal communities, are available and sustainable.
18668-7	Vanessa Soncco		In terms of fire pan usage in the monument, ceremonies require fire to be burned in certain ceremonial spaces. We must allow for the use of ceremonial wood/fire to be unrestricted. Please consider a permitting process created by the Bears Ears Commission.	CUL02-Traditional, Religious, or Cultural Use, ALT05-Alternative E	See the Recreation section of the Proposed Plan for management actions regarding campfires. The Proposed Plan would allow for cultural and traditional needs, as well as for subsistence practices.
18686-2	Ed And Gisela Gunderson Los Alamos, NM 87544		We support a management plan that adopts traditional Indigenous knowledge to guide the stewardship of the Bears Ears National Monument landscape. The most appropriate and effective plan will honor Indigenous connections to the land, utilize Indigenous knowledge for land management prescriptions and ensure collaborative management by the Tribes and Federal agencies. However, we feel there is more that can be done to safeguard important wildlife habitat and other natural and cultural values. We ask you to strengthen the management plan to protect natural areas in a way that also allows the ongoing Indigenous access and proper use of these areas.	CUL02-Traditional, Religious, or Cultural Use, ALT05-Alternative E	Information regarding Wildlife and Fisheries is provided in the Wildlife and Fisheries section of the Proposed Plan. The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations. The Proposed Plan would allow for cultural and traditional needs, as well as for subsistence practices.
3828-1	Michael Shurgot		Bears Ears is fragile and irreplaceable. it is also immensely important to the tribes of the southwest United States, and any final decisions must maximize both protection for the natural environment and the treaty rights of local tribes. Please amend alternative E to accomplish both of thee critical goals.	CUL02-Traditional, Religious, or Cultural Use, ALT05-Alternative E	The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations.
1660-3	Robin Benallie 387 N 300 W Blanding, UT 84511		2. Since we want and need people to understand the sacredness and respect the land, let us teach them! A) We could start in the schools, having knowledgeable locals, Natives and the BLM come into the schools/colleges and do workshops B)) We could have graduates, college students and locals trained to lead guided tours C) Let groups like SPEAR (San Juan Equal Access Rights) teach and guide since they help the BLM maintain trails and put up signs anyway. D) Let us use the resources we have since there is not enough money or people to guard every road and trail. Let's use the people we have effectively	CUL02-Traditional, Religious, or Cultural Use, ALT07-Modification of Existing Alternatives	The agencies will work with local communities as well as the MAC, Tribal Nations, local communities, and local governments to develop an Interpretation Plan. The agencies also work with various partners include the SHPO to educate visitors and monitor cultural sites to ensure they are not being damaged by visitation. See Cross Cultural Education and Outreach within the Proposed Plan for additional management regarding education and outreach.
18987-3			Page 3-404 states: In that same vein, the Hopi are concerned about disturbance in BENM having an effect on ancestral spirits. There is no meaningful scientific methodology or analysis of this statement for concern with the disturbance of spirits resulting from changing the characteristics of the monument. There is no scientific evidence to back this statement and it should not be considered in analysis.	CUL02-Traditional, Religious, or Cultural Use, DATA02-Inadequate Methodologies	As stated in Presidential Proclamation 10285 management should reflect traditional knowledge of Tribal Nations and was used when developing the range of alternatives and the Proposed Plan. Analysis of potential impacts was conducted to incorporate Traditional Indigenous Knowledge as well as western science. The statement in the document reflects a Traditional Indigenous perspective and not a western science perspective.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18657-30	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	After quoting the BEITCs proposed management plan describing the Hopi belief that any disruption of peace and quiet in the monument will disturb the spirits of their ancestors, the agencies then proposed to restrict certain recreational activities primarily motorized recreation and drone flying because they allegedly disrupt natural soundscapes. This management approach from the Analysis of Management Situation (AMS) document was carried forward into Alternative E in the RMP, which includes similar passages. However desirable natural soundscapes may be, native religious beliefs regarding disturbing ancient spirits are not a valid basis for federal policy. Even aside from First Amendment concerns, ancient spirits are not a cognizable part of the human environment that the agencies are required to analyze impacts to under NEPA, and are neither an appropriate nor legally or constitutionally justifiable element to include within a NEPA analysis.	CUL02-Traditional, Religious, or Cultural Use, DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations.
18657-31	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The agencies have made it quite clear that they intend to manage BENM primarily, if not exclusively, for the benefit of native religious practitioners at the expense of all other stakeholders and the American public as a whole. Such blatant favoritism toward members of a certain religion in federal land management policy cannot hope to survive judicial scrutiny under the Establishment Clause of the First Amendment. The repeated effusive language regarding the supposed sacredness of the BENM landscape and numerous references to native religious beliefs throughout both the RMP and the AMS document clearly advance religion and function as a direct endorsement of native religious beliefs. If Alternative E is adopted as the basis for the final management plan, it will almost certainly fail to withstand legal scrutiny.	CUL02-Traditional, Religious, or Cultural Use, DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations.
7958-3			Over the past 24 years I have observed extensive damage done by wood cutters who drive off-road to retrieve their firewood. Associated with this is cutting of live trees and dumping trash. On numerous occasions I have observed these off-road tracks running over open archaeological sites. Cedar Mesa has one of the highest sites densities in North America. A good percentage of your firewood permittees drive many miles to get to Cedar Mesa to cut firewood as a "traditional use." Firewood permits need to be monitored closely as any other BLM permitted activity. Perhaps the BLM could work more closely with other government officials and tribal governments to an eventual move to more self-sustaining energy sources. During winters in southern San Juan County the pollution from wood burning is visible for miles.	CUL02-Traditional, Religious, or Cultural Use, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	See the Forestry and Woodlands section in Chapters 2 and 3. Enforcement and monitoring are part of implementation actions and will continue to occur. Monitoring is included in the Proposed Plan, including collaboration with the BEC and other local law enforcement.
10626-5	Debra Van Putten		I addition, although I am not Mormon, I am aware that this area is sacred to them in term of the Mormon movement to Utah. Indeed, the signage for Snow Flat Road and other locations specifically discuss that role of those road in Mormon history. (Exhibit F) Based on the BLM text, it appears to me that Snow Flat road has been in use for almost 150 years which is very cool. Looking at the list of experts, BLM did not consult with the Mormon church as to whether it had input about the closure of Snow Flat Road, or other locations in the Monument. It is not clear to me why practitioners of some religions would be consulted in such detail, while others equally obvious were not. Parenthetically, BLM did not consult with historians to assess what locations were of US Historical interest and should continue to be accessible.	CUL02-Traditional, Religious, or Cultural Use, PUBL01-Public and Stakeholder Involvement	Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process. See the Proposed Plan in the Travel and Transportation section of Chapter 2 for OHV area designations.
8424-1	Janet Slowman Che		I would like to say that I'm concerned about two pieces. One of them is target shooting. I disagree with having target shooting at Bears Ears because target shooting is basically for pleasure, and it's also to sharpen your skills in something, maybe in the life of an animal, and to be learning that and exercising that at Bears Ears is totally inappropriate. The indigenous communities see Bears Ears as a place of healing, for people, animals, water, the air, and for all of that they deserve their space. They deserve healing space, and target shooting is just a complete contradiction, to say you're going to learn how to shoot better so that you can end something, someone, animals, whatever it may be. People get foolish with guns, and it's a genuine disaster if we get people shooting at Bears Ears. I just completely disagree with that.	CUL02-Traditional, Religious, or Cultural Use, SHOOT02-in favor of shooting closures	In the Proposed Plan, recreational shooting would be prohibited in BENM.
8976-3	Steven Concho P.O. Box 309 Acoma, NM 87034; Randall Vicente P.O. Box 309 Acoma, NM 87034;Aaron Sims 317 Commercial St. NE, SUITE 102 Albuquerque, NM 87102	Pueblo of Acoma; Pueblo of Acoma; Pueblo of Acoma	Furthermore, Acoma recommends management of the BENM consider the completion of a comprehensive archaeological and ethnographic surveys in collaboration with Tribes to ensure that culturally significant resources and sites within BENM are accurately documented and protected. This can lead to enhanced monitoring which if implemented should be conducted, employing Tribal cultural experts who can advise and oversee the management of these lands in accordance with traditional practices and contemporary conservation needs.	CUL03-Tribal Concerns	Ongoing cultural resources inventory would occur under the Proposed Plan. Priorities for inventory would be established in the CRMP that would be developed in collaboration with the BEC and Tribal Nations. The agencies are also working with partners on multiple ethnographic projects and the plan and cultural resource management plan have guidance on continued ethnographic work to document sites important to Tribal Nations and the BEC.
18713-10	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	DEIS Chapter 3.5.3.1 deals with the history of the Bears Ears region, however this section describes only the factors driving the influx of European colonists as they entered the region. Some Navajo history is mentioned, but the majority of direct impacts to Native People that happened within BENM by settlers to Ute People. Why are they not mentioned? The misnamed Posey War resulted in white ranchers and settlers taking over the entirety of Bears Ears in 1923 and established Ute Allotted lands forcing tribal members onto small parcels. It should be noted that undoing the impacts of colonization might be much easier in this landscape due to how long Ute People were able to defend it from mining, logging, and grazing impacts and the short period of time which has elapsed since their removal.	CUL03-Tribal Concerns	The Historic Resources section of Appendix N was updated to include information suggested by the commentor.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17807-11	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Protection for BENM extension based on traditional and historical knowledge, stories, songs and prayer	CUL03-Tribal Concerns	Protective measures would be established and implemented in collaboration with the BEC and other tribal nations for sites, structures, objects, and traditional use areas that are important to Tribal Nations with historical and cultural connections to the land to maintain the viewsheds and intrinsic values, as well as the auditory, visual, and aesthetic settings of the resources. See cultural resources section management common to all in Chapter 2.
17807-13	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Protection of cultural resources shall allow for tangible and intangible traditional and historical knowledge and concepts.	CUL03-Tribal Concerns	Protective measures would be established and implemented in collaboration with the BEC and Tribal Nations for sites, structures, objects, and traditional use areas that are important to Tribal Nations with historical and cultural connections to the land to maintain the viewsheds and intrinsic values, as well as the auditory, visual, and aesthetic settings of the resources. See cultural resources section management common to all in Chapter 2.
8424-5	Janet Slowman Chee		We need to balance things out so we can all enjoy that national monument, gathering wood, gathering herbs. There's sacred sites up there we need to look after. Everything we talked about from the time that we started the movement up to today, we have had permission to run with it. That's what happened. I wanted to say that.	CUL03-Tribal Concerns	A principal goal of the Proposed Plan regarding Cultural Resources is to ensure that BENM resources important for cultural and traditional needs, as well as for subsistence practices and economic support of Tribal communities, are available and sustainable.
18713-7	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	Why did the DEIS not cite the ethnographic cultural data provided by Utah Din Bikeyah to federal agencies, the State of Utah. This was formally delivered by the Navajo Nation in 2012.	CUL03-Tribal Concerns, DATA03-Suggest Additional Data Source	The documents mentioned in the comment, submitted by the Utah Dine Bikeyah as part of the proposal for Bears Ears and the plan they produced, were used in the 2020 MMP as well as this plan.
17807-12	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Landscape How will the aesthetic of BENM be defined	CUL03-Tribal Concerns, LAND01-General	In the Proposed Plan, protective measures would be established and implemented in collaboration with the BEC for sites, structures, objects, and traditional use areas that are important to Tribal Nations with historical and cultural connections to the land to maintain the viewsheds and intrinsic values, as well as the auditory, visual, and aesthetic settings of the resources.
17807-9	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Hunting Appropriate songs, prayers and cultural resources will be used. This is a sacred activity.	CUL03-Tribal Concerns, REC06-Shooting Sports/Hunting/Fishing	The use of firearms in the lawful pursuit of game will not be affected by the recreational shooting closure in the Proposed Plan.
19002-2	Maury Bergman bergmanmaury@gmail.com		The primary focus of the Proclamation is to preserve, protect and restore cultural, historical and spiritual aspects of the area. When reading the PMP it talks primarily about indigenous cultures and heritage, but seems to ignore all other genres. The Proclamation states that the Bears Ears region is also important to, and shows recent evidence of, non-Native migrants to the area from pioneer settlements, ranching, outlaws, etc. Preserving these heritages would continue the practice of cattle ranching, religious or spiritual gatherings, family reunions that have taken place on the Monument for decades, dispersed camping, hunting etc. Disabling access or usability to these areas on the Monument violates the purpose of the proclamation.	HIST001	The Proposed Plan is consistent with the Antiquities Act, Proclamation 10285, and the protection of the objects identified therein. There are opportunities for input as consistent with the National Environmental Policy Act. The planning effort included multiple opportunities to provide input and attend public meetings during scoping and when the draft was open for public input. Citizens can also engage with local government officials who represent them and attend the Monument Advisory Committee Meetings and provide public comments there.
19026-23	Brian Carlstrom	National Park Service	Glossary-9 National Historic Trails Federal Protection Component: the definition here is specific to "high potential route segments," which along with high potential historic sites is one type of federal protection component. This should be redefined or 'federal protection component' changed to 'high potential route segment'	HIST001	Thank you for your comment, however there are no National Historic Trails within BENM.
19033-4	Randy Parker	Salt Lake County Farm Bureau	We all understand and appreciate the uniqueness of the Bears Ears area and the beauty of Southern Utah. But it is equally important to understand and appreciate the unique character of the ranching families of San Juan County and Southern Utah who have for generations cared for the land and harvested the renewable forage producing beef and lamb for American dinner tables. These ranching families are the first environmentalists who love the land respected the unique character of their area before there was a Forest Service or BLM, and long before today's debate management of a Bears Ears National Monument.	HIST001	While livestock grazing is a use noted in the Proclamation, it is not itself an object. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See the Cultural Resources section in Chapter 2. The proclamation states that grazing is a historical use by indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details.
19034-2	Gail Johnson		Halvor wrote a book about his grandfather which shares many letters that Jim Scorup wrote as well as many letters he received. These letters document the struggles and fortitude of this man and his family. The Cleggs have asked me to include the book with my comments. (Attachment #2) The book also contains photographs of sites that should be recognized as eligible for nomination as a Traditional Cultural Property under the National Historical Preservation Act. Jim Scorup's history of grazing livestock in this area, as well as grazers who have followed after him, should be recognized as eligible for nomination as a Traditional Cultural Practice, also under the National Historical Preservation Act.	HIST001	While livestock grazing is a use noted in the Proclamation, it is not itself an object. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources section in Chapter 2.
19035-7	Gail Johnson		The entire RMP has only considered the history, culture, and traditions of the tribes while totally ignoring the history of non-indigenous groups. Preserving the historical grazing livelihoods and heritage as they relate to BENM are relevant to the analysis and should have been included in the plan.	HIST001	Non-Indigenous historical connections to the BENM area are presented in detail in the Historic Resources section. See Management Actions Common to All Action Alternatives in the Cultural Resources section) that notes the importance of non-Indigenous cultural resources within BENM. The Proposed Plan is consistent with the Antiquities Act, Proclamation 10285, and the protection of the objects identified therein.

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					The proclamation states that grazing is a historical use by Indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details.
19035-9	Gail Johnson		All of this is my heritage and the heritage of my family. Our roots are in this area and in this heritage. This tradition, this culture, this history of grazing must be allowed to continue. The White Canyon Grazing Allotment is a Traditional Cultural Property rooted in the history of San Juan County. Livestock grazing here must be protected as part of the "historic" landscape mentioned in the proclamation. It must be allowed to maintain its economic viability as it has historically. It is a part of the economic fabric of San Juan County. Livestock grazing within BENM, including the White Canyon Allotment, constitutes a Traditional Cultural Practice and Traditional Cultural Property (TCP) because they are associated with the events that significantly contributed to the development and settlement of San Juan County. Rodeos, county and state fairs, FFA and 4-H activities, scout camps and youth treks all celebrate this history. Based on historical grazing records, my life of 71 years of living in this area, and my personal experience of this area for the last 46 years that we have owned the White Canyon Allotment, this TCP looks much like it did more than 50 years ago. Because of good stewardship by the grazers, this allotment maintains significant integrity to warrant its viable grazing continuation. I truly believe the other allotments in this monument do as well. To retire or impose such restrictions on this allotment that would force its retirement would change the character of the TCP and conflict with the National Historical Preservation Act. I strongly urge the agencies to deeply analyze how each alternative in the RMP draft may affect the integrity of this Traditional Cultural Property and Traditional Cultural Practice.	HIST001	While livestock grazing is a use noted in the Proclamation, it is not itself an object. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources section in Chapter 2. The proclamation states that grazing is a historical use by Indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details.
19036-3	Gail Johnson		Many of the sites mentioned in the attachments, camps, corrals, springs, are eligible for nomination under the National Historical Preservation Act as Traditional Cultural Properties. The long history of livestock grazing in this area is eligible for nomination under the NAPA as a Traditional Cultural Practice. I ask the agencies to thoroughly review these histories as they are part of the landscape of the monument that should be preserved.	HIST001	While livestock grazing is a use noted in the Proclamation, it is not itself an object Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources section in Chapter 2.
19001-2	Bruce Lyman bjlyman61@gmail.com		The purpose of the monument is to preserve, protect and restore cultural, historical and spiritual aspects of the area. As I read the management plan it talks a lot about indigenous cultures and heritage, but seems to ignore all others. The plan needs to take into consideration non-Native migrants to the area from pioneer settlements, ranching, Spanish influence, and the outlaws that came through this area. To preserve these heritages the practice of cattle ranching, camping, hunting, religious gatherings and family reunions that have taken place on the monument would need to continue. Locking out or severely limiting the usability to these areas on the Monument violates the purpose of the proclamation	HIST001; PUBL07	See The Historic Resources Section of Chapter 3 and Appendix N for discussion of historic periods including those of Euro-American explorers and settlers.
17573-46	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	All three presidential proclamations on the BENM (Obama-9558, Trump-9681; and Biden-10285), agree that this landscape has played an important role in the settlement of the American West. Together they recognize the rich ranching history of Southern Utah. 23 They recognize the role of latter day saint pioneers as early settlers of the land. That descendant community still lives in the area today. Ranching and grazing on Monument lands is an important connection to their history and should not be severed from these lands. Therefore, the obvious conflict between the proclamations recitation of Proclamation 9558, combined with the additional language in Proclamation 10285 is inconsistent with one another. The Agencies have made no attempt to acknowledge and reconcile this inconsistency.	HIST001-General	The Proposed Plan is consistent with Proclamation 10285, which incorporates Proclamation 9558. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63.
17573-47	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	As was covered in the States prior comments, agriculture and livestock grazing on the lands now within the boundaries of the BENM is an economic and cultural practice that has allowed Native Americans and immigrants to live and settle in southern Utah for hundreds of years.24 Arguably, lands used for grazing are considered by some to be what is known as Traditional Cultural Properties (TCP) eligible for inclusion in the National Register of Historic Places (NRHP) because they are associated with cultural practices or beliefs of a living community that (a) are rooted in a communitys history, and (b) are important in maintaining the continuing cultural identity of the community.25 As such, these register-eligible TCPs are included among the historic resources identified in BENM Proclamations 9558 and 10285 that need protection by 54 U.S.C. 320301.26 Today, the ranching industry in America is facing unprecedented hurdles and challenges nationwide,27 and if livestock ranching is lost in the BENM this important economic, cultural, and historical iconic way of life will be lost.	HIST001-General	The State has failed to provide the agencies with sufficient information to begin evaluating lands used for livestock grazing as a TCP. The State has provided no delineated tangible area or property to be evaluated as a TCP. Accordingly, the agencies are not able to evaluate livestock grazing as a TCP in accordance with Section 106 at this time. Further, the State's comments make references to multiple groups but does not identify a single community or group that are associated with, and value the traditional practice of grazing (see <i>National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties</i>). However, even if the State had provided sufficient information to begin evaluating lands for livestock grazing as a TCP, the Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 97% acres of grazing currently available for grazing would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.
17573-64	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	No one can argue that livestock grazing does not have deep, historical roots in the BENM.60 Even Proclamation 10285 states that Elk Ridge also has a long history of livestock grazing by Navajo and Ute families and later Anglo settlers. Similarly, livestock grazing within BENM is important in maintaining the continuing cultural identity of the community. The descendants of Mormon pioneers, for example, are bound to agree with Robert S. McPhersons statement that the Latter-day Saint mission to San Juan in the late 1800s framed the character and grit of those early settlers, enshrined the importance of the San Juan mission in their hearts, and proved their stalwart ability to see a task	HIST001-General	The State has failed to provide the agencies with sufficient information to begin evaluating lands used for livestock grazing as a TCP. The State has provided no delineated tangible area or property to be evaluated as a TCP. Accordingly, the agencies are not able to evaluate livestock grazing as a TCP in accordance with Section 106 at this time. Further, the State's comments fail to identify a single community or group that is associated with and values the traditional practice of grazing (see National Register Bulletin 38: <i>Guidelines for Evaluating and Documenting Traditional Cultural Properties</i>). Nevertheless, even if the State had provided sufficient information to begin evaluating lands for livestock grazing as a TCP, the

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			through to its end. Today, many living descendants still believe that the San Juan mission is an ongoing task, that character and grit are essential traits of the cultural identity, and that livestock grazing in BENM is a vital economic and cultural practice that makes these things possible. As a TCP, the agencies must assess how the RMPs alternatives may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the propertys location, design, setting, materials, workmanship, feeling, or association. ⁶¹ And if there is an adverse effect, which will almost certainly be the case under Alternatives B through E, then the agencies must engage in consultation to avoid, minimize, or mitigate adverse effects. For instance, the mandate to retire grazing lands ⁶² would have an adverse effect on the TCP because it would, at least, change the character of the propertys use. Grazing land retirement would also lead to neglect, which would further diminish critical aspects of integrity. The Agencies have failed to consider these important points and the reliance interests for grazing and have failed to fulfill their coordination and consistency obligations. As the agencies prefer to avoid adverse effects, it behooves them to keep these allotments open to grazing and find permittees who desire to continue this traditional economic and cultural practice.		Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 97% of lands within BENM currently available for grazing would remain available to grazing under the Proposed Plan, which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future, unless through voluntary relinquishment. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.
17573-65	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Like the livestock grazing TCP, the draft EIS/RMP ignores historical transportation features within the BENM. This lapse has potential negative effects on monument- and non-monument-protected objects. Setting aside the dispute over R.S. 2477 rights-of-way ownership, consider the historical roads and routes ⁶³ found within these rights-of-way. The agencies, especially the BLM, know that transportation features located within R.S. 2477 rights-of-way are, by definition, older than 50 years; they played critical roles in events important to local history, and they must be formally recorded and evaluated for National Register eligible when they are located within an undertakings area of potential effects. Some of these historical roads and routes undoubtedly qualify as historic properties, ⁶⁴ and the agencies must make a reasonable and good-faith effort to identify them commensurate with the undertaking.	HIST001-General	The agencies perform Section 106 consultation during both the land use and implementation level planning processes for travel management planning. The agencies have and will consult on effects determinations of travel management area designations as part of the current land use planning process. The agencies are considering effects to all historic properties (including historic roads) as a result of designating areas open, limited, or closed to OHV use. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
17573-66	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Without an understanding of the historic property status of historical features, the agencies certainly cannot assess effects, let alone seek ways to avoid, minimize, or mitigate adverse effects caused by an undertaking. Closure of historic roads will inevitably lead to natural and human reclamation thereby changing the character and eventually, the existence of the road. Consider how the draft EIS/RMPs alternatives designate some areas as closed to OHV travel ⁶⁷ which, consequently, closes historical roads and routes without completing an implementation-level travel management plan or without completing either the Section 106 process or a program alternative. This unlawful action invites the same type of legal complaint as the one challenging the Richfield RMP and TMP, i.e., BLM failed to make a reasonable and good-faith effort to identify historic properties before adopting the TMP. ⁶⁸ The State strongly objects to this backdoor approach to restricting travel, and not solely because of the dispute over R.S. 2477 rights-of-way ownership. Here, the State is frustrated because the draft EIS/RMP dismisses historical roads and ignores the statutory requirement of 54 U.S.C. 306108. In short, designating areas as closed to OHV travel is a type of activity that has the potential to cause effects on historic properties, ⁶⁹ especially National Register-eligible roads and routes.	HIST001-General	The agencies perform Section 106 consultation during both the land use and implementation level planning processes for travel management planning. The agencies have and will consult on effects determinations of travel management area designations as part of the current land use planning process. The agencies are considering effects to all historic properties (including historic roads) as a result of designating areas open, limited, or closed to OHV use. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.

Table U-9. Decision Process/Agency Attention

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
10626-25	Debra Van Putten		These comments are substantive and I request that they be treated as substantive. I am a formerly practicing attorney who work in a federal agencys General Counsels office. Since it appears that BLM/Forest Service are short on legal assistance, this means that the Agencies must specifically and substantively respond to my above comments. If BLM cannot find a lawyer to answer these comments specifically it cannot issue a decision.	ATTN02-Notice of Appeal or Litigation	Per section 6.9.2 of the current BLM Handbook H-1790-1, the BLM must consider all substantive comments to the extent feasible. Per revised CEQ implementing regulations at 40 CFR 1503.4, the agency shall respond to [substantive] comments timely submitted during the public comment period.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19001-5	Bruce Lyman bjlyman61@gmail.com		As a member of the San Juan County Farm Bureau board, I look at the grazing maps finding they are absolutely useless. They are extremely unclear and provide no allotment boundaries which makes it impossible to even make an intelligent comment. I'd appreciate if more detailed maps could be provided and then allow for time to make appropriate comments.	ATTN07; GRAZO1	See existing livestock grazing maps in the RMP/EIS. Additionally, a map of allotments overlaid with areas closed to grazing will be added to the RMP/EIS.
19001-4	Bruce Lyman bjlyman61@gmail.com		There are additional roads I would like to comment on as well but the maps provided are so vague and insufficient that it is impossible to comment intelligently without having better and more detailed maps provided. I would appreciate it if you could provide me with more detailed maps showing possible road closures so that I can provide intelligent and pertinent comments. From the maps provided it appears that huge areas are just being closed with little thought being provided as to why.	ATTN07; TRAVEL01	See Appendix A in EIS Volume 2 for the maps of the Proposed Plan. An interactive web map was provided during the public comment period, available through the project website also allows users to view any combination of layers.
12470-1	Kayela Bradford		The maps provided do not provide enough information for me to make an informed decision on which option I would prefer. The roads have been left off of the maps so I don't feel like I can make an informed decision can be made. My family has been camping, hunting, riding ATV's and cutting firewood in this area for many generations. In the past my family has also had grazing permits in this area and currently many friends have the grazing permits there. I need more information to be able to be able to provide input. Please provide a copy of the maps with roads and grazing allotments added so an informed decision can be made.	ATTN07-Request for documents or information	See Appendix A in Volume 2 for the maps of the Proposed Plan. An interactive web map was provided during the public comment period, available through the project website also allows users to view any combination of layers.
15761-1			I feel the document needs to accomodate the needs of the nonspeaking English fraction. How are they supposed to understand this document? Please learn how to write this in the languages of the tribes who have an interest in this area.	ATTN07-Request for documents or information	Content used for educational purposes will be developed at the implementation stage. Language has been added to the Cross Cultural Education and Outreach Section similar to the Recreation Section regarding universal design, including accessibility through use of multiple languages. See Cross Cultural Education and Outreach Section.
19040-3	John Redd mitchredd@gmail.com		The BENM RMPP feels like a repeat of the same" old"thing. A decision made to give the outward appearance of an inclusive approach, when in fact, it is an approach that preemptively allocates power and privilege to one group the BEITC. With apologies to George Orwell, "all animals are equal, but some are more equal than others" in the resource management decision making process. In this multi-use environment clearly defined priorities and a framework that optimizes, not necessarily maximizes, each group's desires regarding resource management should be documented. Resource management decisions could then be taken within an established framework to optimize the priorities that are met without designating one group to have primacy in the resource management process. The proposed approach will bestow the ultimate decisionmaking power with one group, the BEITC, and not with the broader group of stakeholders. The BEITC will have an outsized impact, if not total control of the decision-making process. This reasoning holds if the designated primacy group was changed to recreational users or agricultural users or extractive industries having the ultimate power. One group's priorities will be maximized at the expense of the other groups. Grazing rights, recreational use rights, conservation rights, and heritage/spiritual preservation rights can and should coexist in this wondrous beautiful area. Most of the goals and objectives of these resource uses are compatible. Where they conflict is the challenge for the resource management decision process. Let us not mistake expediency, which may come with some decision-makers given primacy with an effective or optimal resource management decision process.	DECI01	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Service's cooperative agreement with the BEC. The permit holder is always included when making decisions about their permits. In addition, Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, subject to existing laws and regulations. These regulations require coordination and consultation with interested publics and governmental agencies. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Proclamation 10285 re-establishes the BEC and directs the agencies to meaningfully engage with the Commission, including through the planning process, in order to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations.
19034-3	Gail Johnson		Livestock grazing is a traditional practice in the landscape of BENM. Were it not for livestock grazing, the permanent settlements in this area would not have succeeded. I urge the agencies to reconsider the effect of each of the alternatives in the Draft RMP on the historical/traditional grazing properties and grazing practices. Non-indigenous people as inheritors of these histories should be given the same opportunity as the BEC to 11provide guidance and recommendations". The historical connections of indigenous people and nonindigenous people must be treated equal. The proclamation does not preclude this equal treatment.	DECI01; HISTO01	Non-Indigenous historical connections to the BENM area are presented in detail in the Historic Communities, Historic Resources section. See Management Actions Common To All Action Alternatives in the Cultural Resources section) that notes the importance of non-Indigenous cultural resources within BENM. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Proclamation 10285 re-establishes the BEC and directs the agencies to meaningfully engage with the Commission, including through the planning process, in order to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations. The proclamation states that grazing is a historical use by indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details.
19036-4	Gail Johnson		After reviewing the draft RMP and studying Proclamation 10285, I am concerned about the RMP's failure to address all of the objects of "historic interest" that are part of the entire monument landscape. The plan should not only address the traditions, culture, and historical heritage of the tribal groups, it should also address the traditional, cultural, and historical heritage of the non-tribal groups. The proclamation does not preclude the plan from doing that. Current federal law requires that. This monument's landscape is sacred to indigenous people of the southwest; it is also sacred to non-indigenous people of this area.	DECI01; HISTO01	Non-Indigenous historical connections to the BENM area are presented in detail in the Historic Communities, Historic Resources section. See Management Actions Common To All Action Alternatives in the Cultural Resources section) that notes the importance of non-Indigenous cultural resources within BENM. The Proposed Plan is consistent with the Antiquities Act, Proclamation 10285, and the protection of the objects identified therein.

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					The proclamation states that grazing is a historical use by indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details.
19034-1	Gail Johnson		It is apparent to me that the BENM Draft RMP does not address the historical connections that non-indigenous people have for this landscape and only acknowledges the history of tribal nations. The proclamation establishing this monument does not give co-management status to the tribal nations through the Bears Ears Commission. The BEC is to provide "guidance and recommendations ... " This draft not only elevates the experiences and histories of indigenous people, it totally ignores the experience and histories of non-indigenous people. This is inherently unfair and will likely result in unnecessary conflicts in the future. A problem the agencies do not need. Because of this unequal application of the law, I cannot embrace any of the alternatives in the draft plan.	DECI01; PUBL07	Non-Indigenous historical connections to the BENM area are presented in detail in the Historic Communities, Historic Resources section. See Management Actions Common To All Action Alternatives in the Cultural Resources section) that notes the importance of non-Indigenous cultural resources within BENM. The Proposed Plan is consistent with the Antiquities Act, Proclamation 10285, and the protection of the objects identified therein. The proclamation states that grazing is a historical use by indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details.
18965-7	Simone Griffin	BlueRibbon Coalition	Because legal challenges exist to the Biden expansion of the Bears Ears National Monument, the BLM/USFS should delay any further development of this RMP until the legal challenges are settled. It is entirely possible that the courts could strike down the designation of this monument as an illegal abuse of power under the Antiquities Act. If this were to happen, the lands being analyzed in this RMP process would not need a separate RMP. Any work performed on this RMP would be a waste of agency time and resources. Until the legal questions are settled, a NEPA process is premature.	DECI01-Decision Process	Proclamation 10285 directs the BLM and the USDA Forest Service to "prepare and maintain a new management plan for the entire monument" for the specific purposes of "protecting and restoring the objects identified [in Proclamation 10285] and in Proclamation 9558". Accordingly, the agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of Bears Ears National Monument consistent with the protection of Monument objects and other applicable laws, regulations, and policies.
889-25	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The agencies must clearly explain any differences between this management plan and the 2020 Bears Ears Management Plans We emphasize that the agencies are obligated by NEPA and the APA to clearly explain the rationale for any differences between the new Bears Ears Management Plan and the 2020 management plans, including any new areas designated as OHV closed or managed for wilderness characteristics. While agency management decisions are not required to follow the judicial doctrine of stare decisis, consistency between agency actions is still strongly desired, for similar reasons. Radical departures from their prior decisions undermine the agencies ability to engage in long-term management and harm the publics ability to rely on decisions being carried through. As a result, the courts have traditionally subjected sudden reversals of prior agency decisions to additional scrutiny.	DECI01-Decision Process	Alternative A includes decisions made in the 2020 Monument Plan. All effects from alternatives and the Proposed Plan have been analyzed using Alternative A as the baseline.
10626-10	Debra Van Putten		In the EIS, BLM erroneously views the purpose of the Bears Ears National Monument designation to be to close roads and access as the sole management tool to protect antiquities that may be found the Monument. This is in fact not what the Proclamation says. The Proclamation specifically observes that the existing road density for Bears Ears is acceptable and consistent with ecological preservation: Despite millennia of human habitation, the Bears Ears landscape remains one of the most ecologically intact and least-roaded regions in the contiguous United States. As a result, the area continues to provide habitat to a variety of threatened, endangered, sensitive, endemic or otherwise rare species of wildlife, fish, and plants. The area also contains a diverse array of species that benefit from the preservation of the landscapes intact ecosystems. (Emphasis supplied). The Proclamation further envisions recreation as a continuing mission for Bears Ears: The area contains numerous object of historic and scientific interest and also contains other resources that contribute to the social and cultural wellbeing of the areas modern communities as a result of world class outdoor recreational opportunities including unparalleled rock climbing available at places like the canyons in Indian Creek; the paradise for hikers, birders, and horseback rider provided in the canyons East of Elk Ridge; and other destinations for hunting, back packing, canyoneering, white water rafting, and mountain biking, that are important to the increasing travel-and tourism based economy in the region. As should be obvious from a detailed map showing all of the relevant trailheads and locations for the listed activities (not included in the EIS, or anywhere else it appears), the vast majority rely on 4 wheel drive vehicles over the existing roads to access the relevant locations. Virtually none of the recreational activities are accessible by major roads and walking, especially given how arid the terrain is. Indeed, during my last visit to Bears Ears, three rangers parked their trucks in the dispersed camping area at Comb Wash/Arch Canyon, unloaded OHV 4x4 side by sides marked as Ranger vehicles, and headed out on presumably official business. Notably, the Biden Proclamation did not ban off road vehicles or mechanized travel in Bears Ears, contrary to the Proclamations for locations such as Dinosaur National Monument. Instead, the primary focus of the Proclamation was to prevent mineral extraction as a threat to the Monument which is specifically referenced: All federal lands and interests in lands within the boundary of the monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, or the disposition under public law lands or laws applicable to the United States Forest Service from location, entry and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the Monument.(emphasis added). Except for Alternative A, all of the Alternatives rely solely on somehow controlling access with respect to a million+ acre area as the primary means to protect antiquities, likely at the expense of Native Tribe Access, scientific study access, fire prevention access, and recreational access restrictions that are not needed.	DECI01-Decision Process	Please see the Purpose and Need section of the EIS for a list of purposes and desired outcomes as set forward in Presidential Proclamation 10285. The Proposed Plan provides multiple options beyond closing roads and controlling access to meet these purposes and desired outcomes while following direction and guidance required in BLM and USDA Forest Service regulations and policy.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
10626-20	Debra Van Putten		Furthermore, the close, cozy relationship between BLM, the Forest Service and the BEC is not authorized by statute or even the terms of the Biden Proclamation. Although the Biden Proclamation does not constitute substantive law (separation of powers requires Congressional participation), BLM has gone far beyond the mandate it was given. As quoted above, the Proclamation only gives the Native American Tribes the opportunity to comment and provide recommendations. It does not authorize wholesale co-management and delegation of essential federal government functions to a non-federal government agency. This is made explicitly clear in President Obamas Proclamation 9558, which is incorporated into the Biden Proclamation. That Proclamation provided for consultation with Native American Tribes, the opportunity for Tribes to provide comment as part of general public engagement and required an Advisory committee for equal and fair representation in the process for all stakeholders. For purposes of protecting and restoring the objects identified above, the Secretaries shall jointly prepare a management plan for the monument and shall promulgate such regulations for its management as they deem appropriate. The Secretaries, through the USFS and the BLM, shall consult with other Federal land management agencies in the local area, including the National Park Service, in developing the management plan. In promulgating any management rules and regulations governing the NFS lands within the monument and developing the management plan, the Secretary of Agriculture, through the USFS, shall consult with the Secretary of the Interior through the BLM. The Secretaries shall provide for maximum public involvement in the development of that plan including, but not limited to, consultation with federally recognized tribes and State and local governments. In the development and implementation of the management plan, the Secretaries shall maximize opportunities, pursuant to applicable legal authorities, for shared resources, operational efficiency, and cooperation. The Secretaries, through the BLM and USFS, shall establish an advisory committee under the Federal Advisory Committee Act (5 U.S.C. App.) to provide information and advice regarding the development of the management plan and, as appropriate, management of the monument. This advisory committee shall consist of a fair and balanced representation of interested stakeholders, including State and local governments, tribes, recreational users, local business owners, and private landowners. In recognition of the importance of tribal participation to the care and management of the objects identified above, and to ensure that management decisions affecting the monument reflect tribal expertise and traditional and historical knowledge, a Bears Ears Commission (Commission) is hereby established to provide guidance and recommendations on the development and implementation of management plans and on management of the monument. The Commission shall consist of one elected officer each from the Hopi Nation, Navajo Nation, Ute Mountain Ute Tribe, Ute Indian Tribe of the Uintah Ouray, and Zuni Tribe, designated by the officers' respective tribes. The Commission may adopt such procedures as it deems necessary to govern its activities, so that it may effectively partner with the Federal agencies by making continuing contributions to inform decisions regarding the management of the monument. The Secretaries shall meaningfully engage the Commission or, should the Commission no longer exist, the tribal governments through some other entity composed of elected tribal government officers (comparable entity), in the development of the management plan and to inform subsequent management of the monument. To that end, in developing or revising the management plan, the Secretaries shall carefully and fully consider integrating the traditional and historical knowledge and special expertise of the Commission or comparable entity. If the Secretaries decide not to incorporate specific recommendations submitted to them in writing by the Commission or comparable entity, they will provide the Commission or comparable entity with a written explanation of their reasoning. The management plan shall also set forth parameters for continued meaningful engagement with the Commission or comparable entity in implementation of the management plan. Emphasis added. There is nothing in this that envisions Native American co-management or the BEC having finally sign off authority on the RMP/EIS, as is described in the RMP/EIS. The role is strictly advisory and arms length, and the obligation of the Department of Interior is merely to consider Native American input such input can be rejected, rather than BEC input being binding.	DECI01-Decision Process	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. Additionally, Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process.
10626-23	Debra Van Putten		Regardless of the Proclamations, there is no rational basis for the Native Tribe/BLM/Forest Service Triumvirate that has been created per the EIS, Appendix C: The BLM and USDA Forest Service, in collaboration with the BEC or comparable entity, should identify any programs, functions, services, and activities that selfgovernance Tribes can assume, as described in the Indian Self-Determination and Education Assistance Act of 1975 and later amendments, regulations, and agency policy associated with this act. Self-determination contracts, also known as "638 contracts," and negotiated funding agreements to assume programs, functions, services, or activities for the benefit of American Indians because of their status as American Indians are available to use under the discretion of the manager. The BLM and USDA Forest Service should engage with the BEC and Tribal Nations to ensure access to and use of sacred sites, as defined in Executive Order 13007. The BLM and USDA Forest Service should seek to enter into agreements to share capability, expertise, and insight into fostering the collaborative stewardship of sacred sites and other properties of traditional religious and cultural importance. The BLM and USDA Forest Service will collaborate with the BEC and Tribal Nations when developing site-specific protection and management plans that pertain to sacred sites or properties of traditional religious and cultural importance. Site-specific protection and management plans may include procedures for utilizing Tribal expertise and capabilities regarding stabilization, patrolling,	DECI01-Decision Process	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. Additionally, Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			interpretation, stewardship education, or ethnographic insights into site use and significance, including identification of traditional cultural properties, American Indian sacred sites, and cultural landscapes. Federal land managers and Tribal Nations may formalize site-specific protection and management plans with the completion of an agreement document. While federal law is clear and consistent that Native American Tribes have fully recognized rights to comment and be heard, there is no statutory basis for a Native American Tribe or group of tribes, to co-govern federal property. Even the Native American Religious Freedom Act provides a right of access to federal land for religious purposes, but does not provide management rights or the right to de facto assert sole occupancy of such lands. Federal law on repatriation of Native American grave goods and human remains provides for return and respect for Native American relics, but it does not provide Tribes with management rights or de facto sole occupancy in the lands where they have been found on the off chance something else might show up. NEPA is intended to provide public comment on actions that affect environmental use of public lands, and there are ample provisions for cooperation, but in this instance, the Tribes are the applicant. It is not appropriate, ethical or consistent with the policies underlying NEPA to hand the application back to the applicant for research and resolution. It is certainly not appropriate to stack all sources of input to the government with only the views of the applicant, to the exclusion of all other interested parties. NEPA requires disclosures of conflicts of interest, prevents volunteers from engaging in policy decisions, and maintaining of secrecy during the initial EIS stages. The inappropriateness of the triumvirate approach is shown by BLMs failure to include any user group of BENM, other than the Native Tribes, in any pre-EIS draft release process. This is not compliant with the NEPA requirement for a process driven by open public comment from all interested parties.		
10626-26	Debra Van Putten		The EIS must be redone as it violates US law, per statement and comments uploaded and attached.	DECI01-Decision Process	The Proposed Plan complies with all applicable laws and regulations.
10626-27	Debra Van Putten		It should be noted that in the preparation for this EIS, BLM omitted the mandatory fair and balanced advisory committee required in the Proclamations and federal law. There appears to have been exactly one non-Native American member of the public whose pre-EIS input was solicited and heard. The BLM did not merely fail to adhere to the directions of the Biden and Obama Proclamations and statute to have a neutral and inclusive advisory board. It worked hard to exclude anything but Native American voices from the process. In addition, to then have the Native Tribes (one of only many stakeholders) have co-control over the EIS/NEPA process, up to and including authority over final edits) is pretty much the definition of an arbitrary and capricious process and one that intentionally subverts the NEPA public participation process. The one-sided process employed by BLM has resulted in a great deal of bitterness locally, with locals constantly complaining that they feel their input doesnt matter and they have no voice. The EIS/RMP is fatally flawed and the process must be restarted at the beginning, with inclusion of all members of the public and a correct understanding of the legal basis for federal land management and the NEPA process. The EIS and the process by which it was produced is simply not legal.	DECI01-Decision Process	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. See Section 4.X for a list of consultation, coordination, and public involvement meetings held for the BENM RMP/EIS. Additionally, Appendix O provides details on public involvement, government-to-government consultation, Monument Advisory Committee involvement, and cooperating agency engagement during the planning process.
14767-1	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Having reviewed the AMS, we found only a single mention, the quote from FLPMA, that these lands are not to be managed under the typical multiple use framework. This failure vitiates much of the AMS. This failure to acknowledge and actually implement FLPMA Section 302 (a) in the EIS and DRMP render the work completed so far fatally flawed. The mandates of the Omnibus Public Lands Act, the Secretarial Order and the various NLCS directives must be the foundation and sole focus of the planning effort, but I could find scant evidence in the EIS or DRMP that the BLM was even familiar with these requirements. Most of the applicable requirements within the Omnibus Public Lands Act, the Secretarial Order and the various NLCS directives were neither mentioned or even cited within the EIS or DRMP in the BLMs rush to maintain the status quo multiple use management. In case the import of the above is not clear enough, lets go through it step by step: 1) The Monument is established by Presidential Proclamation 2) The Proclamation requires a management plan be developed under FLPMA Section 302 (a), the Omnibus Public Lands Act, the Secretarial Order and the various NLCS directives 3) The BLM writes an EIS and DRPM but only, at most, mentions a tiny fraction of the requirements under which the plan must be developed and comply but does not actually implement them 4) The BLM writes an EIS and DRPM that does not even mention, let alone implement the vast majority of the requirements which the plan must implement and comply with The scale of this blatant failure on the BLMs part to read, understand and implement its own clearly applicable requirements is breathtaking.	DECI01-Decision Process	The agencies complied with all applicable federal Law and regulation in developing the RMP/EIS. See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS and for which the EIS is compliant.
14767-22	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In this same vein, we were shocked to see the following statement in the very first paragraph of the AMS: While the USDA Forest Service has its own set of land use planning and administrative review processes to ensure compliance with relevant laws and regulations, throughout this process, the BLM and USDA Forest Service have agreed that the USDA Forest Service will adopt the BLMs land use planning and administrative review processes (BLM and USDA Forest Service 2022). As such, BLM regulations and direction are cited throughout this document and apply to both agencies. The Forest Service does not have the authority to simply ignore its regulations and directives for convenience sake. Forest Plan Management Areas, Standards and Guidelines, etc have specific legal meaning that differ from the structure of a BLM RMP. This single issue makes any resultant product indefensible.	DECI01-Decision Process	Thank you for your comment. The document has been adjusted. The USDA Forest Service is adopting the BLM's administrative review process as per 36 CFR 219.59. This was agreed upon with the BLM in a signed Memorandum of Understanding in June 2023 (FS Agreement Number 23-MU-11046000-046). The Manti-La Sal National Forest's land management plan still applies to NFS lands within the BENM boundary for which the more restrictive plan direction applies. Designated areas such as the Dark Canyon Wilderness, IRAs, and the Cliff Dweller RNA are managed as per the plan direction in the Manti-La Sal's land management plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-34	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The Department of the Interior Departmental Manual 516 DM1 provides important guidance for the development of DEIS: 1.2 Policy. It is the policy of the Department: A. To provide leadership in protecting and enhancing those aspects of the quality of the Nation's environment which relate to or may be affected by the Department's policies, goals, programs, plans, or functions in furtherance of national environmental policy; Section D states, in part: (4) Shall monitor, evaluate, and control on a continuing basis their activities as needed to protect and enhance the quality of the environment. Such activities will include both those directed to controlling pollution and enhancing the environment and those designed to accomplish other program objectives which may affect the quality of the environment. They will develop programs and measures to protect and enhance environmental quality. They will assess progress in meeting the specific objectives of such activities as they affect the quality of the environment. Section E states, in part: (2) Shall use information obtained in the NEPA process, including pertinent information provided by those persons or organizations that may be interested or affected, to identify reasonable alternatives to proposed actions that will avoid or minimize adverse impacts to the human environment while improving overall environmental results. (3) Shall monitor, evaluate, and control their activities on a continuing basis to further protect and enhance the quality of the environment. Implementation of these requirements was not done in the alternatives and DRMP.	DECI01-Decision Process	This document and associated appendices is compliant with NEPA. See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS. Public input on any errors is considered during the comment period between the Draft EIS and Final EIS. Any errors in data will be updated at that time. The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.
17573-117	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The laws presently in place are largely sufficient to protect the monument objects. They have been doing so for a hundred years. The problem is not a lack of restrictions or rules. The problem is a lack of resources for the agencies. 76 The State respectfully requests that any provisions that wont be enforced simply not be included in the final RMP/EIS. Leaving those provisions out will better provide clear expectations for all users of BENM long into the future.	DECI01-Decision Process	Thank you for your comment.
18082-60	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We also recommend clearly identifying the objects and values from the proclamations that the RMP aims to protect throughout the analyses in the Final EIS [see Section 1.6 (G)(4)(a) of BLM Manual 6220].	DECI01-Decision Process	Presidential Proclamation 10285 declares that the entire landscape reserved by the Proclamation is "an object of historic and scientific interest in need of protection" and specifies that the Monument ensure "the preservation, restoration, and protection of the objects of scientific and historic interest on the Bears Ears region, including the entire Monument landscape." The Proposed Plan and environmental impact statement are consistent with all applicable laws and policies. BLM Manual 6220 is included in Appendix B (Laws, Regulations, Policies, and Plans Considered in the Development of the Resource Management Plan and Environmental Impact Statement).
18082-9	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	BLM Manual 6220, National Monuments, National Conservation Areas, and Similar Designations, states that in accordance with Section 302 of the Federal Land Policy and Management Act (FLPMA), if the presidential proclamation that designates a Monument or NCA conflicts with FLPMA's multiple use mandate, the designating language will apply. Land use planning decisions for each Monument or NCA must be consistent with the purposes and objectives of the designating proclamation or Act of Congress. ⁷ This indicates that a RMP for a monument should, as needed, contain protections above what is normally considered for a RMP in order to protect monument ROVs listed in the Presidential Proclamation. Therefore, we recommend the Final EIS clarify how the BENM Proclamation affects multiple use mandates used in alternatives screening and in identifying the selected alternative.	DECI01-Decision Process	BLM Manual 6220 is included in Appendix B (Laws, Regulations, Policies, and Plans Considered in the Development of the Resource Management Plan and Environmental Impact Statement) and was considered in drafting this RMP. The Proposed Plan is consistent with all applicable laws and policies.
18610-10	Kate Mabry		Our National Monuments are to be cherished, protected and enjoyed by ALL Americans. It is discriminatory to enter into a co-stewardship management agreement with Native American tribes because it excludes all others from equal input into management decisions. Cancel the discriminatory agreement or enter into co-stewardship agreements with ALL Americans.	DECI01-Decision Process	Development of this EIS/RMP included analysis under multiple federal laws (see Appendix B) and included involvement of multiple stakeholders (See Appendix O). The plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Service's cooperative agreement with the BEC.
617-2	Charlie Lindrum		Your concern about the lack of specificity regarding the areas being protected is valid. Clear delineation of protected areas is crucial for effective implementation and accountability. Providing detailed descriptions or maps outlining the specific regions or features under protection would enhance transparency and ensure that the plan meets its intended goals. Clarity in this regard will not only alleviate concerns but also facilitate better understanding and support from all stakeholders involved.	DECI01-Decision Process	Maps and figures are provided in Appendix A of Volume II of the RMP/EIS.
697-3	Utah hiker		The new plan must have specific tough protective decisions and designations. Nothing in the plan should be vague or threatened by politically expedient interpretation. Supplemental rules may also be needed to effectively enforce some plan decisions.	DECI01-Decision Process	The analysis in the RMP/EIS informs the decision of how the Monument will be managed. Agencies can utilize implementation level planning and supplementary rules to assist in implementing the management for the Monument..
889-17	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Finally, the fact that the agencies have signed a co-management agreement with the BEITC and the DEIS declares their intent to manage the monument according to Traditional Indigenous Knowledge – a thinly veiled code word for native religious beliefs – clearly results in an excessive government entanglement with religion, violating the third prong of the Lemon Test. There is no conceivable way that allowing practitioners of a specific religion to effectively write federal policy based solely on their religious beliefs does not result in excessive entanglement with religion. The DEIS indicates a clear and undeniable intent by the agencies to manage the Bears Ears monument in a way which endorses and favors native American religious beliefs over all competing interests and views regarding how this landscape should be managed. While the agencies would almost certainly never consider signing a cooperative management agreement with the LDS Church and stating that a national monument would be managed in accordance 12 with traditional Mormon or Christian beliefs, that is the	DECI01-Decision Process	The Proposed Plan would not restrict public access in a way that favors any specific groups or religions. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			equivalent of what is occurring with Bears Ears. While tribal interests are important, the tribes are but one stakeholder in the management of the Bears Ears National Monument, which belongs to all Americans and should be able to be enjoyed by all of them. Giving a privileged role in the monuments management to native religious practitioners, and especially giving them special access rights (beyond those required by treaties) to monument lands that the general public does not have, unconstitutionally endorses and favors one religion over all others in violation of the First Amendment. Unless the agencies radically reverse course, the Monument Management Plan that is created through this process will be highly vulnerable to constitutional challenge on Establishment Clause grounds, and we urge the agencies to reconsider their approach. We urge the BLM and Forest Service to carefully assess all management actions proposed in the various alternatives to ensure they do not run afoul of the Establishment Clause, and to ultimately adopt a final alternative that does not explicitly favor native religious practitioners over the general American public as alternative E does. We also request that the agencies expressly address Establishment Clause concerns in the EIS and Record of Decision.		
15323-4	Bill McGlynn 1711 W College St Bozeman, MT 59715	Recreational Aviation Foundation	We are also concerned that the yet to be developed soundscape management plan would add more new limitations that could further preclude authorization of any additional remote airstrips for recreational use. By establishing a planning process that for all practical purposes eliminates the potential for successful future airstrip authorizations, the DEIS exposes a predecision by the BLM to not approve any recreational-use airstrip authorizations, that is inherent in those future NEPA reviews.	DECI01-Decision Process, ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and the Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Impacts of aircraft on the natural environment are discussed in Backcountry airstrip use and impacts are discussed in the Travel, Transportation, and Management; Wilderness Study Areas; Wildlife and Fisheries; Natural Soundscapes; Cultural Resource Management, Indigenous People's Religious Concerns, and Tribal Use; Archaeological Sites; and Recreation Use and Visitor Services sections of Chapter 3. A future soundscape management plan would be a future implementation level plan which would require a separate NEPA process. The evaluation and designation of airstrips are implementation level decisions that are not addressed at the planning level in the RMP/EIS.
9524-2	379 Ridge View Drive Grand Junction, CO 81507;Sherry Schenk		. It is my hope that any derogatory names of places or objects in the draft plan for the National Monument will be removed and changed to something more appropriate prior to the finalization of the Bears Ears RMP.	DECI01-Decision Process, ALT07-Modification of Existing Alternatives	The Proposed Plan would address derogatory names through the Co-Stewardship implementation level plan, developed in collaboration with the BEC and other Tribal Nations. Changing the geographic names of natural features, as opposed to the names of agency-designated areas, is a function of the U.S. Board on Geographic Names.
18657-65	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The following egregious errors in RMP planning process, documents, and maps were brought to the attention of planning managers by members of UPLA and Ride with Respect during in-person and virtual public meetings in April and May of this year. We are deeply concerned about the legal and procedural violations that have subsequently been willfully perpetuated by planning managers, as these errors have not been since corrected in RMP semantics, documents or, static or interactive maps. 1. Planning for the expanded BENM should not be conducted until litigation is resolved. 2. From the outset, scoping should have portrayed the current status of public land management accurately, and portray the affected area in sufficient detail for the public to meaningfully participate. 3. Existing management plans for the 1.36 million-acre area within BENM boundaries do not interfere with genuine interest to improve conservation. 4. Planning for BENM should recognize that the State of Utah is increasing its support of trail work, education, and law enforcement in the planning area. 5. The AMS factually misrepresents the actual ROS zoning in Manti-La Sal National Forest. 6. The 1.36 million-acre planning area has reached a threshold of the minimum motorized access needed to effectively manage diverse recreation opportunities. 7. The closed OHV area designation is not warranted outside of designated wilderness areas and WSAs within the 1.36 million-acre planning area. 8. As with OHV area designations, any alternatives developed for an RMP should avoid limiting the addition of motorized routes beyond the severe limitations already made by presidential proclamation. 9. Planning for BENM should not reduce the concept of a backcountry setting to mean primitive or non-motorized. 10. Minimizing the density of motorized routes, in and of itself, is not an appropriate goal in national monument RMPs. 11. Planning for BENM should not rely on past planning processes that bypass NEPA and clearly lack a willingness or ability to manage for the primary type of travel that is used by visitors to BENM: motorized travel. 12. Planning for BENM should institute new regulations sparingly and recognize organized and commercial activities as opportunities for partnership. 13. Planning for BENM should utilize proactive recreation management to protect monument objects and values in the long term. 14. Planning for BENM must adequately assess the socio-economic benefits of motorized recreation, and how it would be affected by any alternatives. 15. Collaborative efforts should remain faithful to the congressional directive of public lands to benefit the public as a whole. 16. Planning for BENM must recognize congressional prohibition on buffering wilderness areas. 17. Planning for BENM must not automatically convert all Lands with Wilderness Characteristics (LWC) to Lands Managed for Wilderness Characteristics (MWC). We raise these concerns again in this comment letter to ensure that they are fully and accurately documented as public comments and incorporated into the administrative record for this RMP. We caution RMP planning managers on any contemplation of advancing the draft RMP to final	DECI01-Decision Process, ATTN02-Notice of Appeal or Litigation	Public input on any errors was reviewed and considered, with updates made to this final environmental impact statement, including maps. Please see the interactive map available on ePlanning, which allows for comparison of data at a fine scale. The Proposed Plan employs a zoned approach to recreation management. Under this zonal approach to recreation management, all motorized route management will be consistent with the requirements of the applicable recreation zone.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			status or adopting any of the five alternatives or combination of alternatives as currently reflected within the draft RMP, without first rectifying each error and omission noted above.		
18657-51	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	BENM RMP planning managers from both the BLM and Forest Service have not been ignorant or uninformed of the map inaccuracies cited above. Members of Ride with Respect and UPLA raised all of the concerns above to RMP planning managers during in-person and virtual public meetings in April and May of this year. We are deeply disappointed, and concerned about the legal and procedural violations that have subsequently been willfully perpetuated by planning managers, since these errors have not been corrected in RMP documents or interactive maps. As remedy, in order to comply with NEPA requirements, the BLM and Forest Service must provide maps of sufficient quality to allow members of the public to identify landmarks, areas, and designations on areas that are contained within the full range of proposed changes and impacts to public access and multiple uses within BENM. We subsequently assert the legal and procedural requirement for RMP planning managers to retract the draft RMP to rectify this issue, and re-open the draft RMP / DEIS for a new public comment period after adequate maps have been developed and released for public review.	DECI01-Decision Process, ATTN02-Notice of Appeal or Litigation, EDIT01-tech edits needed in the EIS	The environmental impact statement and associated appendices are compliant with NEPA. Public input on any errors identified was considered and reviewed with updates made to this final environmental impact statement. The public was provided with both a static map and an interactive map allowing for the same information to be viewed in detail.
18082-10	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	While the Draft EIS acknowledges in several impact analysis sections that overall environmental effects would be lessened by best management practices (BMPs), mitigation, permits and/or under site-specific projects, it does not characterize the nature and magnitude of the resource impacts that would occur under the alternatives with specificity; rather, it compares the impacts among all the alternatives in relative and general terms. The specifics of these differences are instead relegated to environmental analyses that would occur later during site-specific project planning stages when measures would be applied to protect ROVs. BLM Manual 6220, Sections 1.6(G)(4)(d) and (e) state land use plans must provide, to the extent possible, a thorough quantitative analysis of the effects of all plan alternatives on the objects and values; where a thorough quantitative analysis is not possible, provide a detailed qualitative analysis of the effects of all plan alternatives on the objects and values. We encourage the exploration of these impacts to the fullest extent possible in the Final EIS because the RMP stage of analysis provides the clearest opportunity to examine impacts at a broad scale, which is particularly important for connected resources, and provide the most certain level of protection. This broad scale may be more likely to be overlooked, or associated impacts minimized, at the project level. In addition, while many environmental analyses for livestock grazing are deferred until the permitting stage, grazing permits may not undergo a NEPA analysis (see comments on Grazing Permits and NEPA later in the letter) and are typically not subject to a public commenting period, thus limiting public and agency involvement in addressing the concerns currently documented by the Draft EIS. We recommend the Final EIS characterize the specific types and magnitudes of potential impacts to Monument ROVs in order to ensure that Monument ROVs are protected.	DECI01-Decision Process, DATA02-Inadequate Methodologies	Throughout the final EIS, qualitative discussion of the magnitude and scale of effects to resource objects and values, from a specific best management practice or mitigation on a future undetermined management action is not always possible beyond a relational discussion of more or less effect between alternatives. When more specificity can be determined such as where acres of land where a mitigation applies differ, more specificity is provided. The Proposed Plan also includes prioritizing 7 allotments for the completion of rangeland health assessments within 3 years and NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals. Chapter 2, Livestock Grazing, includes: Develop and implement allotment management plans (AMPs) for all allotments within BENM during the BLM's scheduled permit renewal process and USDA Forest Service allotment decision making process, as necessary, in collaboration with the BEC.
1657-1	Rob Adams		I realize that according to the RMP, grazing will be allowed to continue upon most lands within the boundaries of the BENM. (The exception being identified acreages outlined in certain alternatives.) You may wonder at my concern over its being allowed to continue when the RMP airmatively states that it will. That concern lies in the fact that the ongoing governance of the management practices on BENM exclude many important stakeholders including grazing permit holders, recreationists, local governments, local history organizations and many others while granting absolute primacy to a single stakeholder group, the BEC. This lack of representation places the continuation of grazing in the monument in jeopardy. My reading of the portions of the RMP covering ongoing governance as stated in Proclamation 10285 run counter to federal law. The Federal Land Management Policy Act of 1976vii, the National Environmental Policy Act of 1970, and the Federal Advisory Committee Act (FACA)viii among others clearly mandate the inclusion of broader representation from local interest groups.	DECI01-Decision Process, GRAZ01-General	Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Service's cooperative agreement with the BEC. The permit holder is always included when making decisions about their permits. In addition, Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, subject to existing laws and regulations. These regulations require coordination and consultation with interested publics and governmental agencies.
889-63	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Because the references to resource rest closures are so vague, it is difficult to evaluate what effect they would have on recreation. If they mostly coincide with existing seasonal closures such as the winter seasonal closures of high elevation areas or the seasonal closures of climbing routes in the Indian Creek area for raptor nesting season, their impacts could be minimal. If however these are used to close lower elevation desert areas that are normally accessible during the winter, or close popular areas during the peak visitor season in the spring, these closures could be highly detrimental to recreation. Overall, we strongly oppose this provision both for the possible impacts it could have on recreation and for the fact that it effectively allows tribal groups to enshrine their religious beliefs about the land needing to rest into law, forming an entirely different basis for seasonal closures than traditional seasonal closures which are used to prevent scientifically measurable impacts to resources or wildlife habitats.	DECI01-Decision Process, REC01-General	The Proclamation requires that the agencies ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations. Recreational Area Management Plans would analyze certain seasonal closures which would be subject to additional NEPA and public engagement; other seasonal closures may be applied due to impacts occurring to resources. All seasonal closures would be done in collaboration with the BEC and in consideration of Traditional Indigenous Knowledge.
889-86	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We submit that any problems with drones would be far better addressed through project level management plans regarding specific locations where drone use has proven to be a problem. Other National Forests and BLM Field Offices have done this successfully. For example, the Pike San Isabel National Forest (which is still operating under a Forest Plan written in 1984 that certainly did not contemplate drones) issued two seasonal closure orders last year (found here and here) for raptor nesting sites, which included the following language: Restricted activities include but are not limited to motorized use, non-motorized use, climbing, rappelling, shooting, hiking, fishing, kayaking, drone	DECI01-Decision Process, REC01-General	Drone use in airspace is managed by the Federal Aviation Administration. However, the agencies have the authority to manage the casual use landing or taking off of drones on BLM-administered and NFS lands. Additionally, the agencies have the discretion to dictate all aspects of drone use if that drone is being used as part of a permitted activity. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			flying, and any and all other human or mechanical presence within the Restricted Areas. ⁴⁰ The absence of specific language in the Forest Plan addressing drones clearly did not prevent the Pike San Isabel NF from issuing Forest Orders prohibiting them in certain locations for purposes of wildlife protection. As for recreational conflicts, I am fairly certain I have seen a past version of the Forest Order from the White River National Forest prohibiting drones at the Maroon Bells Scenic Area around Maroon Lake, though the current version does not contain that prohibition. And the White River National Forests current web page for Hanging Lake states that drones are prohibited, though they are not mentioned in any current Forest Order and I am uncertain of the exact legal basis for this prohibition. Finally, the BLM Moab Field Office recently enacted restrictions on drone flying in certain canyons through a location specific activity management plan, even though the relevant Resource Management Plan from 2008 makes no mention of drones.		
1293-2	Janet Kahan		Please uphold important agreements, like banning target shooting and closing Arch Canyon to off-road vehicles, reached between land managers and tribes.	DECIO1-Decision Process, SHOOT02-in favor of shooting closures	The agencies considered the commentor’s suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
889-27	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Likewise, the agencies are obligated to explain the rationale for its decisions with respect to each individual route and area under consideration, and to provide detailed explanations for disregarding facts and circumstances that underlay or were engendered by the prior policy where individual route designations differ from those in the 2020 management plans. This is especially critical for routes such as Arch Canyon that were subject to specific plan guidance in the 2020 management plans. In order to justify a decision to close a route that was designated open in either the 2008 RMPs or the 2020 Bears Ears Management plans, the agencies must explain how the underlying facts have changed in order to justify a different decision, or provide reasons why the facts and circumstances underlying the previous decision must be disregarded. If it cannot explain why a particular route or area should be closed now when it was previously kept open, then the agencies are obligated to keep that route or area open consistent with its prior decision. Anything less would be considered an unexplained inconsistency with a prior decision under the Supreme Courts Fox test and would therefore be arbitrary and capricious. We note that the DEIS as currently written is missing any discussion of the 2020 Management Plans Decision regarding the road in Arch Canyon, even though that road is proposed for closure through an OHV-closed area designation in two alternatives including the preferred alternative. The agencies must justify this decision and explain what new facts or conclusions they are relying upon to justify the exact opposite decision from that they made only four years ago. Unless the agencies provide a clear rationale for disregarding the reasons for that prior decision to keep it open, the decision to close it as proposed in alternatives D and E is arbitrary and capricious.	DECIO1-Decision Process, TRAVEL01-General	All decisions made in the travel planning process would be consistent with the BLM's national OHV strategy at 43 CFR 8343.1 and in accordance with the requirements of Proclamation 10285. See Appendix H: Travel Management Plan Criteria.
19011-2	Elizabeth Merritt law@savingplaces.org	National Trust for Historic Preservation	On March 21, 2024, the Advisory Council on Historic Preservation unanimously adopted a policy statement on Indigenous Knowledge and Historic Preservation (available at https://www.achp.gov/digital-library-section-106-landing/achp-policy-statement-indigenous-knowledge-and-historic). We strongly recommend that you reference and incorporate this policy statement as guidance in the final Management Plan, in light of the fundamental role that indigenous knowledge plays in shaping the basic approach of the Plan.	DECIO2; TIK01	Section 3.3 of the RMP/EIS discusses Traditional Indigenous Knowledge and its incorporation in the plan. The Proposed Plan was developed in collaboration with the BEC and Tribal Nations. See Chapter 2 for how Traditional Indigenous Knowledge is included in the management actions.
14767-109	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Further, since the BLM no longer does NEPA on grazing permits because of its addiction to FLPMA 402c2, the BLM will never comply with NHPA Sec. 106 requirements for the primary source of impacts to archi resources, livestock grazing. The BLMs abuse of FLPMA 503c2 must be factored in. Failure to do so is clearly arbitrary and capricious decision-making.	DECIO2-Section 106 Consultation	All BLM permits include the following stipulation: Grazing management practices will comply with Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah (1997). In Chapter 2 Livestock Grazing the Proposed Plan identifies priority allotments for which the BLM will complete land health assessments, and, if needed, causal factor determinations. The BLM will then complete appropriate NEPA and Section 106 compliance and consultation to renew such permits. Additionally, the BLM has created a schedule for all allotments within BENM to fully process permit renewals.
17573-45	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The grazing-related features and infrastructure identified in Proclamation 10285 are the remnants of westward expansion and settlement of later-day communities and should not be removed from the landscape as proposed under some draft alternatives. Even should the Agencies decide to not protect grazing infrastructure as identified objects, they still deserve consideration under section 106 of the National Historic Preservation Act. Before any action that may negatively affect historical practices or historical properties, including grazing allotments that extend well beyond 50 years, the Agencies are required to do a proper and complete Section 106 analysis. Failure to do so will further evidence that the Agencies are willfully choosing to ignore Congress in their quest to implement the executive order.	DECIO2-Section 106 Consultation	Historic properties associated with grazing are evaluated for their eligibility. See the changes in the Proposed Plan to the Livestock Grazing section about range improvements and water improvements. Language has been added to the Livestock Grazing section to continue the existence of range improvements if determined they no longer serve a purpose for the allotment or do not protect Monument objects. The agencies will follow all applicable laws, such as the NHPA, when implementing discretionary actions, such as the removal of range infrastructure.
18994-1	Redge Johnson (please contact PLCPO's archaeologist, Kristopher Carambelas)		The agencies, especially the BLM, know that transportation features located within R.S. 2477 rights-of-way are, by definition, older than 50 years; they played critical roles in events important to local history, and they must be formally recorded and evaluated for National Register eligible when they are located within an undertaking's area of potential effects. Some of these historical roads and routes undoubtedly qualify as historic properties, ¹⁶ and the agencies must make a reasonable and good-faith effort to identify them commensurate with the undertaking.	DECIO2-Section 106 Consultation, TRAVEL01-General	The agencies perform Section 106 consultation during both the land use and implementation level planning processes for travel management planning. The agencies have and will consult on effects determinations of travel management area designations as part of the current land use planning process. The agencies are considering effects to all historic properties (including historic roads) as a result of designating areas open, limited, or closed to OHV use.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
19010-3	Jim Mullins		Thirdly, to address long term damage to cultural sites, native vegetation, water quality/quantity as well as riparian areas, immediate compliance monitoring and resource assessments need to be established. No new water developments, nor livestock grazing from perennial surface water, riparian areas and spring should be allowed.	DECI04; WAT01	Under the Proposed Plan, agencies would conduct comprehensive monitoring to track water quality conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects. Additionally, the BLM plans to continue AIM monitoring across the Monument to understand watershed health. See the Chapter 3 Water Resources section for additional details on AIM Monitoring. USDA Forest Service National Watershed Condition Framework assesses the condition of watersheds that intersect NFS lands. Priority watersheds are identified using the Watershed Condition Framework to focus on maintaining or improving watershed condition every 5 years (or sooner if needed).
14767-161	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	If monitoring indicates that domestic livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts in a manner that ensures protection of BENM objects. This suffers from a wide range of fatal flaws. 1) It presumes that monitoring is mandatory. It is not. 2) It presumes that the monitoring is designed specifically to determine impacts to all affected objects. It is not. 3) It ignores the mandate to restore. 4) It ignores that the BLM has already determined that livestock grazing is protecting and restoring all objects. (on what rational basis is unknown since no analysis was provided) 5) It presumes that changes will be implemented when the history of at least the last 30 years has demonstrated that that does not happen, and nothing within the DRMP would indicate the BLM will change the path it has been on. 6) It presumes the effectiveness of these changes to completely eliminate (protect and restore) all the impacts of livestock grazing, without providing what these changes may be or what their effects are. Develop and implement allotment management plans (AMPs) for all allotments within BENM during the scheduled permit renewal process and in collaboration with the BEC. Development and implementation of AMPs would include analysis of the allotment, including range improvements, and ensure consistency with protection of BENM objects. The 1980s San Juan RPSs made the same basic promise. The ancient San Juan RMP from 34 years ago made the same promise. The 2006 RMP made the same basic promise. The 2016 era RMP made the same basic promise. The 2020 RMP made the same basic promise. To date, the vast majority of the BENM allotment dont have an AMP. Those few with AMPs, were written more than half a century ago. Those ones, while technically in place, are not being implemented.	DECI04-Mitigation and Monitoring	The Proclamation states that grazing is an authorized use. Alternatives consider multiple ways to manage grazing under existing permits. The plan provides direction towards implementation of grazing permit renewals and allotment management plans. Grazing management in all alternatives is designed to protection resources, including objects of the Monument. Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558."
14767-4	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The benchmark by which the RMP must be developed is the protection and recovery mandate. Comparing the currently ungrazed Canyonlands National Park watersheds to the adjacent Dugout Ranch pastures, we found clearly higher multifunctionality was attained in the Park, and that this was primarily driven by greater C-storage and better dust retention The functional significance of biocrusts is countered by their high vulnerability to surface disturbances that can result in long-term reductions in their structure and functionality (Belnap and Eldridge, 2003). In sparsely vegetated drylands, disturbance-induced declines in biocrusts often are accompanied by accelerated soil erosion and persistent changes in soil physical and biogeochemical properties (Barger and others, 2006; Neff and others, 2005), thus they become a secondary change agent when grazing, climate, or invasive plants alter their abundance	DECI04-Mitigation and Monitoring	Grazing management in the Proposed Plan should protect resources and BENM objects. Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." Grazing is a discretionary action and agencies can, under existing laws and regulations, suspend or cancel permits to close areas to grazing either temporarily or long-term.
14767-49	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The RMP failed to provide feedback loops so that once Standards and Guidelines (S&G) evaluations are completed, that the BLM requires regular reviews to insure significant progress is being made. Correcting this situation is critical and fundamental to everything the BLM does.	DECI04-Mitigation and Monitoring	The Proposed Plan includes monitoring for a variety of resources within BENM to ensure management actions are moving resource conditions towards goals and objectives as well as to adapt management actions in collaboration with the BEC to move resource conditions towards goals and objectives. Appendix P. Monitoring Strategy provides information about monitoring within BENM to meet the objectives in the RMP.
1610-2	PAUL JORDAN 14089 W Baltic Ave Lakewood, 80228		I would like to see immediate compliance monitoring and resource assessments, prohibiting new water developments, and excluding livestock grazing from perennial surface water, riparian areas, and springs. This would help reverse decades of damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils.	DECI04-Mitigation and Monitoring	Grazing management in the Proposed Plan protects Monument objects, which include riparian habitats, cultural resources and water. See the Proposed Plan under the Livestock Grazing section. The Proposed Plan includes actions that prohibit new water developments unless they protect BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17969-6	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Adaptive Management TNC supports the national BLM effort to move towards adaptive outcome-based management to provide BLM managers and grazing permit holders greater flexibility in the management of permitted livestock and to better achieve habitat and vegetation goals. When applied in BENM, adaptive outcome-based management could help to ensure the resiliency of people, and the natural and cultural resources of BENM in the face of the impacts from changing land use and climate change. Impacts to these resources from increased visitation and climate change are accelerating. To adapt to the changes and potentially mitigate these impacts, a dynamic management approach is needed. Adaptive outcome-based management could allow future management decisions for BENM to utilize an Indigenous and modern knowledge/technologies including the most recent data and management experience from monitoring, evaluation, and experimentation completed after the RMP is finalized.	DECI04-Mitigation and Monitoring	Thank you for the comment, see the Proposed Plan under the Livestock Grazing section. The Proposed Plan includes various management actions that continue to provide the agencies discretion on a case by case basis to adaptively manage livestock grazing, including research in collaboration with permittees and the BEC as long as those actions protect Monument objects.
18082-13	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Preferred Alternative proposes to develop monitoring and mitigation measures during RMP implementation. Without defined mitigation and monitoring, it is difficult to determine how the goals and objectives will be met and how Monument ROVs will be protected. BLM Manual 6220, Sections 1.6(G)(c) and (g) state that land use plans must include mitigation to ensure all monument objects and values will be protected, and that the plan include a monitoring strategy that identifies indicators of change, methodologies, protocols, and time frames for determining whether desired outcomes are being achieved. We recommend the Final EIS include monitoring and mitigation measures in order to protect Monument ROVs.	DECI04-Mitigation and Monitoring	Chapter 2 of the EIS and the proposed RMP include management actions to restore and protect BENM resource objects and values as well as goals and objectives for them. Appendix P. Monitoring Strategy provides information about monitoring within BENM to meet the objectives in the RMP.
18082-61	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Finally, we recommend the selected alternative in the Final EIS and ROD include avoidance, minimization, and mitigation measures to protect ROVs consistent with Monument purposes and objectives in the Proclamations.	DECI04-Mitigation and Monitoring	Chapter 2 of the EIS and the proposed RMP include management actions to restore and protect BENM resource objects as well as goals and objectives for them.
18082-1	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We have evaluated the information in the Draft EIS and supporting documents and our review has identified environmental concerns and deficiencies in the analysis that the EPA recommends are addressed in the Final EIS. The BENM was established specifically to protect and restore the Monuments ROVs. Based upon limited available information, this Draft EIS identifies ROVs that are currently in degraded conditions. Of particular interest to EPA, there are high value aquatic and riparian resources in BENM that are not meeting desired conditions under current management practices. It will therefore be important that this RMP include specific standards and measures to restore and protect the Monuments ROV conditions. Our main concern with the Draft EIS is that the Preferred Alternative currently does not provide concrete measures, metrics, milestones, and timeframes to protect and restore ROVs consistent with the BENMs established resource protection goals.	DECI04-Mitigation and Monitoring, ALT05-Alternative E	Chapter 2 of the EIS and the proposed RMP include management actions to restore and protect BENM resource objects as well as goals and objectives for them. The Water Resources section provides specific management actions regarding riparian and aquatic resources.
17357-3	Audrey Glendenning	Great Old Broads for Wilderness	Also, the final plan should include language requiring the agencies to immediately begin monitoring grazing permit compliance within the monument.	DECI04-Mitigation and Monitoring, GRAZ01-General	Grazing permit compliance will continue under the Proposed Plan. The Proposed Plan in the Livestock Grazing section of Chapter 2 states the following: the agencies, working collaboratively with the BEC, would prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments, to protect Monument objects BENM objects and coordinate with the BEC on opportunities for joint data collection and/or analysis.
11493-7	Michelle Peot Leeds, UT 84746		To date, the peak USGS river gauge flow rates for this season at the the Four Corners and Mexican Hat San Juan River gauges were at or below the 25th percentile for the past 45 or 100 years worth of data, respectively. The 2022 BENM Annual Managers Report calls attention to the sustained drought in the Four Corners Region. 1 Furthermore, several of the UT Department of Environmental Qualities monitored drainages within the monument and monument adjacent, including Comb Wash, Cottonwood Creek, and the San Juan River, are listed in as an EPA listed 303(d) Impaired Water due to high water temperatures in an ecosystem that supports cold water aquatic life, total dissolved solids, and/or other health indicators. 2 Furthermore, according to UT DEQ, insufficient data exists on water quality for large portions of the monument, including Grand Gulch and Butler Wash. 2 These adverse conditions are only expected to increase with climate change, crop, livestock, and human waste runoff, and increased demands on the watershed. Lastly, increased interest in uranium mining on the border of Bears Ears NM could pose a threat to monument aquifers. For these reasons, its critical that holistic watershed health be actively monitored and managed.	DECI04-Mitigation and Monitoring, WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology)	Under the Proposed Plan, agencies would conduct comprehensive water quality monitoring in cooperation with the State of Utah UDWQ to track conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects (see RMP in the Water Resources section of Chapter 2). Additionally, the BLM plans to continue AIM monitoring across the Monument to understand watershed health. See RMP Water Resources section for additional details on AIM Monitoring. The BLM and USDA Forest Service plan to comply with management actions recommended by UDWQ in TMDL reports related to improving water quality conditions in watersheds that are deemed to be impaired and not meeting state water quality standards (see RMP Chapter 2 Water Resources, Management Actions Common to All Action Alternatives). FS National Watershed Condition Framework assesses the condition of watersheds that intersect NFS lands. Priority watersheds are identified using the Watershed Condition Framework to focus on maintaining or improving watershed condition every 5 years (or sooner if needed).
19008-4	Bayley; George; Kevin; Kirk; Nathan; Ron Chamberlain; Crowley; Dunn; Hedglin; Rice; Skinner info@monticelloutah.org	City of Monticello	Of great concern to us is the lack of involvement that has been offered to the City of Monticello as a Cooperating Agency (CA). The lack of invitation to be part of the planning process as a CA is unconscionable, in our opinion, and was not what we were promised would happen. Other than the few public meetings that have been held, we have not been invited to be a part of the planning process. This is not how it was promised to us that it would be, nor is it how it should be. We strongly object to the management plans that are proposed since we did not have any opportunity to participate in the drafting of those plans.	DECI05	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The City of Monticello was invited to be a Cooperating Agency of the planning process in its initial stages, in October 2022. The MOU between agencies and cooperating agencies, including the City of Monticello, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process.
19017-2	Sylvia Stubbs	San Juan County	Meaningful coordination was not practiced by the agency to the extent it could have been exercised. Utah's Public Lands Policy Coordinating Office (PLPCO) current comment letter lists several examples	DECI05; PUBL04	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Section 6 of Appendix O for a list

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			of agency shortcomings in coordination. A prime example is the development of Alternative E in which the Cooperating Agencies had no participation. Neither did the Cooperating Agencies have a say in determining that this alternative would be the "Preferred Alternative". San Juan County fully supports and incorporates by reference PLPCO's comments on coordination.		of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including San Juan County, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the County as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to ROW open areas. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with local governments, where appropriate to ensure coordination on management of the Monument and implementation of the RMP, and added ROW open areas along paved highways .
17573-9	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	BLMs lack of cooperation with the CAs is in direct violation of their own Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners. Second Edition (2012). Generally, 43 C.F.R. 1610.4 is clearly outlined on pages 12-14 of the Desk Guide. The Agencies have failed to involve the CAs in this process adequately. This failure to comply with internal policies is significant. The CA role derives from NEPA which calls on Federal, State, and local governments to cooperate to achieve productive harmony between humans and their environment (42 U.S.C. 4321-4347).3	DECI05-Cooperating Agency Relationships	Consistent with the referenced Desk Guide, the agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Section 6 of Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the State as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with the State of Utah, where appropriate to ensure coordination on management of the Monument and implementation of the RMP, and added ROW open areas along paved highways .
10626-31	Debra Van Putten		Indeed, federal statute requires a federal agency must be the entity undertaking an Environmental Impact Assessment: (2) Environmental assessment An agency shall prepare an environmental assessment with respect to a proposed agency action that does not have a reasonably foreseeable significant effect on the quality of the human environment, or if the significance of such effect is unknown, unless the agency finds that the proposed agency action is excluded pursuant to one of the agencies categorical exclusions, another agencies categorical exclusions consistent with section 4336c of this title, or another provision of law. Such environmental assessment shall be a concise public document prepared by a Federal agency to set forth the basis of such agencies finding of no significant impact or determination that an environmental impact statement is necessary. 42 USC 4336 Under Federal Statute, Lead agencies (BLM in this case) may designate cooperating agencies where there is special expertise, and cooperating agencies may include Tribes. But the federally permitted role of such cooperating agencies is to provide comment, not to engage in co-Management: (3) Cooperating agency The lead agency may, with respect to a proposed agency action, designate any Federal, State, Tribal, or local agency that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal to serve as a cooperating agency. A cooperating agency may, not later than a date specified in the schedule established by the lead agency, submit comments to the lead agency. 42 USC 4336a Only in the instance of another federal agency being a cooperating agency does the cooperating agency get to actually participate in the Federal NEPA Process: (b) One document To the extent practicable, if a proposed agency action will require action by more than one Federal agency and the lead agency has determined that it requires preparation of an environmental document, the lead and cooperating agencies shall evaluate the proposal in a single environmental document. The BEC is not a federal agency. It has no role in a NEPA process except to provide comment. The role of co-management described in the EIS is not authorized by law, in any way shape or form. To the extent that the Biden Proclamation exceeded the Obama Declaration in describing a desired role for the BEC members, it also exceeded federal law. Presidents dont get to make Tribes part of a federal agency by fiat. If the Executive Branch truly wanted co-management of federally owned Bears Ears with various Tribes (but not the Mormon Church), it needed to change NEPA and a number of other laws. If it wanted to include Native Wisdom into the framework of federal land management, it needed to get an amendment of the National Environmental Policy as codified in statute. We dont have a unitary Executive.	DECI05-Cooperating Agency Relationships	Proclamation 10285 re-establishes the BEC and directs the agencies to meaningfully engage with the Commission, including through the planning process, in order to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations. The role of co-stewardship described in the Proposed Plan facilitates coordination between the agencies and the BEC but does not curtail the statutory and regulatory authorities and responsibilities of the agencies. The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan does not cede any inherently Federal function or decision-making authority over Federal land to the BEC, or otherwise exceed the agencies' legal authority for managing Federal lands within the Monument. The agencies retain all decision-making authority over management actions in the Monument. Additionally, the BEC is composed of elected officials of Federally Recognized Tribes, which have special expertise. The agencies are required under various laws to consult with Tribes on a government-to-government basis on the agencies actions.
1669-5	Kurt Thams 375 Tola Ranch Road Soquel, 95073 ;		For over 26 years, the Utah Back Country Pilots (UBCP) have maintained a collaborative and cooperative relationship with local BLM officials to manage these historic airstrips. This partnership has ensured that aviation remains a low-impact activity while providing significant benefits to public land users. It is imperative that this cooperative approach continues and that the historic value and practical benefits of these airstrips are recognized in the final RMP and future Travel Management Plans.	DECI05-Cooperating Agency Relationships	Thank you for your comment, the agencies are committed to continued collaboration with our Utah Back Country Pilots partners.
17573-11	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Furthermore, the Desk Guide clearly states that the CA relationship is distinctive, moving beyond consultation to engage officials and staff of other agencies and levels of government in working partnerships.7 Unfortunately, the BLMs cooperation with CAs during the BENM RMP/EIS process has been an afterthought that failed to engage officials and staff of other agencies and levels of government in working partnerships at all, let alone a distinctive relationship that moves beyond that baseline consultation. In fact, even the most basic tenements of CA inclusion, like CAs being involved in the hosting of project public open houses and selecting the locations and times to best suit the	DECI05-Cooperating Agency Relationships	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. Section 6 of Appendix O for a list of cooperating agency and engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the State as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			publics involvement have not occurred during this planning process. 8 While the BEC has written the plan, the State has been treated like the general public.		recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with the State of Utah, where appropriate to ensure coordination on management of the Monument and implementation of the RMP, and added ROW open areas along paved highways.
17573-118	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, the State hopes that the Agencies will reevaluate their planning process to this point and the resulting RMP/EIS. The Agencies need to have a hard look and a difficult discussion about how to move forward productively. Continuation on the current path will result in unnecessary delays in the appropriate management of BENM as well as substantial impacts on the Agencies tribal, state, and local relationships.	DECI05-Cooperating Agency Relationships	Thank you for your comment.
17573-13	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Finally, RMP/EIS Section 4.3 inaccurately describes the Agencies working closely with the cooperating agencies to develop alternatives and guide the analysis contained in the RMP/EIS. A very thorough document comparison using document comparison software indicates that almost none of the written or verbal concerns of the CAs were included anywhere within the RMP/EIS. What that comparison did show was that presumably based on CA comments and concerns, the Agencies simply dispersed the concerning language throughout the various sections and alternatives. Thereby making it more difficult for the public, who may only have a singular concern, to fully understand the impacts or implications that the RMP/EIS has on those activities or uses.	DECI05-Cooperating Agency Relationships	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Section 6 of Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the State as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with the State of Utah, where appropriate to ensure coordination on management of the Monument and implementation of the RMP and added ROW open areas along paved highways.
18112-20	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	Blanding City has expressed concerns in meetings about the timing of the roll out of these proposed revisions to the Plan but has been unheard. Chiefly and unlawfully, Blanding City has not been informed of cooperating-agency meetings. But Blanding City is a stakeholder that will be badly and devastatingly impacted by the proposed revisions, and the Bureau acted unreasonably in not involving Blanding City earlier in the process or taking meaningful steps (yet) to respond to the City's concerns. Among the issues Blanding City has tried to address but have been unheard: the City only would receive drafts of the proposal on the same day that meetings were held, preventing meaningful review and discussion; the access limits impact both the abilities of disabled citizens to use the lands around Blanding City and the provision of search and rescue in the area; and there will be likely devastating restrictions on ranchers, extractive-industry entities, and several different types of recreational users. But the City has not been afforded a meaningful opportunity to work with the Bureau to address these issues, defeating the purpose of NEPA. See 7 U.S.C. 706.	DECI05-Cooperating Agency Relationships	The agencies collaborated with cooperating agencies, including Blanding City, throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the Blanding City, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the City as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the cooperating agencies, the agencies made changes to the Proposed Plan including coordination with the local governments, where appropriate to ensure coordination on management of the Monument and implementation of the RMP and added ROW open areas along paved highways.
18238-80	Chaitna Sinha		We propose: the final plan add collaboration with NPS, where appropriate, in the management of visual resources, soundscapes, and dark night skies and when developing a night skies management plan and soundscapes management plan, as well as education programing. DEIS, Vol. 1, p. 2-57.	DECI05-Cooperating Agency Relationships, ALT05-Alternative E, VIS01-General	Collaboration with NPS has been added to the night skies and soundscapes plan as well as education/interpretation plans in Chapter 2.
17969-17	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Travel and Transportation Management TNC supports initiating a travel and transportation implementation-level planning effort in coordination with the BENM Advisory Committee and the BEC as soon as possible and would welcome being part of this process. Because of the implementation-level process for this resource, our comments are limited to two immediate concerns. First, TNC needs to retain maintenance access to range improvements as part of the Dugout Ranch and CRC. Second, as part of our LTPBR BLM agreement we are required to use drones to monitor, we would recommend that use of drones required for research be allowed within BENM.	DECI05-Cooperating Agency Relationships, TRAVEL01-General	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments. OHVs are defined in 43 CFR 8340.0-5 and include aircraft and UASs when used immediately on or above BLM lands and waters, unless in an excepted category (i.e., emergency or authorized use). OHV use, including but not limited to UASs use by permitted users and partners would be allowed under authorized administrative use. Refer to the Proposed Plan regarding authorizations available on a case-by-case basis.
18990-12	Clif Koontz		The BLM has recognized the historic use of Arch Canyon Road so, rather than contradicting this recognition by attempting to close the road, the Lead Agencies would be far more productive working with the State of Utah and San Juan County to more closely manage motorized use of the road given Arch Canyon's significance for natural and social resources including the road itself.	DECI05-Cooperating Agency Relationships, TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit.
11767-6	Steven Kloetzel		Derogatory names of places and objects in BENM must be removed and renamed by Tribes.	DECI06-Government to Government Consultation	The Proposed Plan would address derogatory names through the Co-Stewardship implementation level plan, developed in collaboration with the BEC and other Tribal Nations. Changing the geographic names of natural features, as opposed to the names of agency-designated areas, is a function of the U.S. Board on Geographic Names.
18082-4	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	To the extent such information is not sensitive or otherwise confidential, we recommend the Final EIS document the contact made with Tribal communities, include a summary of the results of Tribal consultation, and identify the main concerns expressed by Tribes, how those concerns were addressed, and what additional or continuing consultations may be warranted. We also recommend identifying any protection, mitigation, and enhancement measures that were identified by Tribes.	DECI06-Government to Government Consultation	Detailed information on Tribal consultation is included in the Proposed RMP/Final EIS in Appendix O.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18082-5	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend the Final EIS summarize the areas in which mutually desired outcomes or consensus with Tribes has been or is expected to be achieved regarding their treaty or reserved rights.	DECI06-Government to Government Consultation	The agencies have considered Tribal Nation's Treaty rights and their trust responsibilities to Tribal Nations. The Proposed RMP/Final EIS followed applicable laws, regulations and policies (Appendix B). The agencies are following applicable USDA and DOI policies concerning Tribal Nations, including EO 13175. Additionally, the agencies have developed a co-stewardship agreement with the five Tribal Nations that make up the BEC in the Tribal Co-Stewardship section found in Chapter 2. The agencies have developed the Proposed RMP/Final EIS in close collaboration with the BEC and will continue to collaborate with the BEC in implementation planning and implementation-level projects.
551-2	Matt Webb 134 Puma Pl Clifton, 85533	University of Arizona	If indigenous knowledge and inclusion are truly to be honored, as seems to be one of the main objectives in the plans for BENM, then review of the cooperative agreement from the many various tribes and agencies must be on a shorter timeline than every five years.	DECI06-Government to Government Consultation	See the Proposed Plan in the Tribal Co-Stewardship Section of Chapter 2. There are requirements to collaborate, consult and engage regularly with the BEC on resource management priorities and joint management opportunities within BENM annually and quarterly. The Overarching Management Section of the Management Action Common to All Resource and All Alternatives in Chapter 2 also says that agencies would collaborate with the BEC on the site-specific implementation-level management that follows this plan.
18082-7	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	As a resource, we recommend the document Best Practices Guide for Federal Agencies Regarding Tribal and Native Hawaiian Sacred Sites for current federal Tribal consultation standards for protecting	DECI06-Government to Government Consultation, DATA03-Suggest Additional Data Source	The Proposed Plan and the agencies' interactions with all Tribal Nations, and the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Additionally, Appendix O provides details on government-to-government consultation during the planning process. Tribal consultation was conducted in accordance with protocols and processes agreed upon by the Tribes and the Federal agencies for this plan effort.
18082-8	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We further recommend referencing Tribal Consultation: Best Practices in Historic Preservation published by the National Association of Tribal Historic Preservation Officers.5 Consultation for Tribal cultural resources is further required under Section 106 of the National Historic Preservation Act	DECI06-Government to Government Consultation, DATA03-Suggest Additional Data Source	The Proposed Plan and the agencies' interactions with all Tribal Nations, and the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Additionally, Appendix O provides details on government-to-government consultation during the planning process. Tribal consultation was conducted in accordance with protocols and processes agreed upon by the Tribes and the Federal agencies for this plan effort.
19017-3	Sylvia Stubbs	San Juan County	Some alternatives have management prescriptions that are inconsistent with the County Resource Management Plan (RMP). Examples of these inconsistencies are pointed out in various sections of this comment letter such as Lands with Wilderness Characteristics, Rights-of-Way, Travel and Livestock Grazing.	DECI07	See Appendix S, Consistency with State and Local Plans for a summary of the consistency review between the Proposed RMP and the San Juan County Resource Management Plan.
19017-4	Sylvia Stubbs	San Juan County	p. 1-8 and 1-9 There is no mention anywhere in the DEIS of the on-going revision of the 1986 Forest Plan and how it would relate to the Bears Ears Monument (BEM) Plan. AU references are made to the 1986 Plan and that it would be superseded by the BEM Plan in the Planning Area where 1986 Plan direction conflicts with BEM Plan direction. We think it would be useful to state that the 1986 Forest Plan is being revised and would defer to the BEM Plan where plans conflict. This may help the public better understand the whole planning situation currently affecting Forest Service lands.	DECI07	Revision of the Manti-La Sal LRMP will include direction to manage under the BENM RMP similar to if not the same as the language in the Proposed Plan amendment to the 1986 LRMP. The USDA Forest Service is not aware of any inconsistency between the BENM Plan and the Forest Plan Revision but will continue to review the BENM plan throughout the revision process for the LRMP.
19026-30	Brian Carlstrom	National Park Service	90 Livestock Grazing Alternative A fits with Tropic's policy on livestock grazing (Garfield RMP 3.2). Alternatives B-D do not specifically provide grazing opportunities. Alternative A should carry across all alternatives.	DECI07	While livestock grazing is a use noted in the Proclamation, it is not itself an object. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources Section in Chapter 2.
19026-31	Brian Carlstrom	National Park Service	91 Livestock Grazing Alternative A fits with Garfield County's policy on livestock grazing. Grazing is a Garfield County cultural resource and is part of our custom culture and heritage and is a critical economic resource. Our policy is to enhance grazing within our county while maintaining or improving rangeland health (Section 3.2 Garfield RMP) Alternative B-D do not specifically meet our goals and policy. Alternative A should carry across all alternatives	DECI07	While livestock grazing is a use noted in the Proclamation, it is not itself an object. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources Section in Chapter 2
19017-12	Sylvia Stubbs	San Juan County	To designate 98% of the BEM in a ROW exclusion category in Alternative E would severely and unnecessarily limit the placement of future infrastructure that may be needed to maintain a viable county economy as well as management of BEM. We can't predict the future need for such infrastructure such as power transmission systems and communications sites and systems that would be prohibited with such an extensive exclusion designation. Curiously, these vast exclusion areas on BLM administered lands are out of sync with ROW designations on Forest lands which are predominately classified as avoidance areas. Any of the other action alternatives would be more reasonable while still providing protection of BEM objects than would Alternative E. Higher percentages of ROW exclusion areas would be in conflict with the County RMP which supports the development of utility corridors and power and communications systems (San Juan County Resource Management Plan, Utility Corridors and Pipelines and Infrastructure, 2022).	DECI07; EJSOC03; LAND01	See the Lands and Realty Management for the Proposed Plan for clarity on which areas fall into each category (open, avoidance, or exclusion). The agencies considered these comments from Cooperating Agencies. Under the Proposed Plan, approximately 47% of BENM would be ROS exclusion, allowing for potential placement of future infrastructure. On NFS lands, Special Use Permits for ROWs are only excluded in designated wilderness.
19014-1	Linda Patterson cactuschic@gmail.com		Grazing, grazing allotments and forage should not be managed under the draft RMP, nor should the BEC be allowed to co-manage grazing, grazing allotments or forage. The Presidential proclamation number 10285 set aside "public Lands and interest in public lands." Interest in public lands means that the public lands are split estate lands and some of the rights/ownership have been allocated to	DECI07; GRAZ01	Grazing allotments are part of the public lands within BENM and, therefore, would be subject to the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			individuals or entities. The ownership that has been split off from the public lands are not owned by the Federal Government and therefore should not be included in the BENM or in the management of the BENM. Grazing allotment ownership have been established under numerous court cases and ACTs. Some of which are: Grazing Act of 1875 Cameron v United States, 148 US 3011893 Livestock Reservoir Site Act, of 1866 (14 Stat-484) Stock-Raising Homesteads, 1916 The Act of June 6, 1924 Surface Mining Reclamation Act of 1977 Various others see attachment A, The Free-Range Report, Preserv;ng Our Wes.tern Outdoor Heritage The Taylor grazing act did not affect valid existing rights. Under FLPMA, all actions ... are subject to valid existing rights. The Monument Proclamation is subject to valid existing rights. In the case of the BENM, the lands that have been split off into other ownership are the grazing allotments and are valid existing rights, that existed before the Tayler Grazing Act. So, in all reality the grazing allotments and the forage therein should not be a part of the monument or included in the management of the monument.		
19017-26	Sylvia Stubbs	San Juan County	The entire section on livestock grazing liberally uses the phrase "protect" or "protection of BEM objects" in reference to livestock grazing and range improvements. This is an incorrect interpretation of how livestock grazing is to be managed and is inconsistent with the Proclamations. The Proclamations use the phrase "consistent with the care and management of the objects" in relation to livestock grazing. "Care and management" implies some degree of flexibility in regard to BEM objects rather than "protection", which, in a strict interpretation, could mean a prohibition of some uses that could affect BEM objects. Since BEM objects seem to be loosely defined as being almost anything within the Monument boundaries including soils, waters, vegetation, wildlife, landscapes, soundscapes, viewsheds and cultural objects among others, a strict interpretation of "protection" could severely limit or prohibit livestock grazing and the use and construction of range improvements necessary to facilitate grazing management. 7 Prohibition of livestock grazing was not the intent of the Monument Proclamation authors as it is specifically provided for "consistent with the care and management of the objects". All use of the word "protect" in the livestock grazing section of the draft plan should be replaced with the proper wording of "consistent with the care and management of the objects" to be consistent with the intent and wording of the proclamations.	DECI07; GRAZ01	Proclamation 10285 directs the agencies to protect and restore Monument objects. As stated in the seventh purpose and desired outcome of the Purpose and Need statement, livestock grazing and recreation uses are not identified in Presidential Proclamation 10285 as objects but are discussed as important land uses in the area and that planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape. The Proclamation 10285 outlines the Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan includes prioritizing 6 allotments for the completion of rangeland health assessment within 3 years of the signing of the ROD.
19017-29	Sylvia Stubbs	San Juan County	p. 2-126 Voluntary Permit Relinquishment Delete the 3rd sentence in Alternative B: " If a holder voluntarily relinquishes its grazing permit or lease, or portion thereof, the lands covered by such permit or lease, or portion of the lands, would automatically become unavailable for livestock grazing in accordance with Proclamation 10285." Relinquished permits do not automatically become unavailable for livestock grazing as the Proclamation specifically states that the Secretary has the option of re-allocating relinquished forage if doing so would advance the purposes of the Proclamations. The statement to be deleted is incorrect and would lead to misinterpretation of the Proclamations. Additionally, retirement of lands from grazing, even if done so voluntarily by a grazing permittee, is contrary to policy in the County RMP. County policy is to support continued properly managed grazing rather than conversion to conservation or other uses.	DECI07; GRAZ01	The Proposed Plan’s direction concerning voluntary relinquishment is consistent with Proclamation 10285.
19017-8	Sylvia Stubbs	San Juan County	Management of additional areas to preserve wilderness characteristics would directly conflict with County policy which supports multiple uses and opposes single resource management schemes and managing lands primarily for wilderness characteristics (San Juan Resource Management Plan 2022, Decision Making Criteria and Land Use Policies pages 3 and 8 and Wilderness page 13).	DECI07; LWC01	The Proposed Plan is consistent with all relevant laws and policies.
19017-21	Sylvia Stubbs	San Juan County	Alternatives D and E include closure of Arch Canyon to OHV use. Such closure would be inconsistent with the San Juan County Resource Management Plan (RMP) including the County Travel Plan, as well as the County's long history of advocating and fighting for the retention of motorized access in the canyon. The objectives and policies in the Land Access section of the County RMP state the importance of an extensive transportation network vital to the "management, development, protection, use and enjoyment of lands and resources and to maintain the culture and lifestyle of the County ...".	DECI07; TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. See Appendix S for a summary of the agencies' consistency review between the Proposed Plan and the County RMP.
19017-24	Sylvia Stubbs	San Juan County	The 2020 BEM Plan recognized the San Juan County A TV/OHV Trail System with direction to "integrate it to the extent possible" in future travel planning efforts. We are disappointed that similar direction is not included in any of the action alternatives. San Juan County and volunteer groups have worked hard over past decades to develop, maintain and promote this system. It is an important part of the travel network that allows recreationists unique experiences to enjoy the natural settings of the County including the Monument. This system is part of the County General Plan for which the BEM Plan must be consistent to the "maximum extent...consistent with Federal law ...". San Juan County would not support any decision that does not give full consideration for inclusion of its ATV/OHV Trail System in travel planning.	DECI07; TRAVEL01	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
19017-7	Sylvia Stubbs	San Juan County	p. 2-18 Management Actions Common to All Action Alternatives (MCAs) The 11 th bullet statement calls for "additional water quality standards" in collaboration with the BEC. It would be useful for better understanding and analysis if some examples of these additional standards were given. In addition, this bullet statement should include reference to State law along with the listed federal law.	DECI07; WAT01	In the Water Resources section of the Detailed Descriptions of the Alternatives in Chapter 2 “the State of Utah” was added to the reference bullet.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19033-6	Randy Parker	Salt Lake County Farm Bureau	The Congress of the United States has the right and the obligation to determine the regulatory reach of federal land management agencies. The Antiquities Act has strict limitations which the Bears Ears Management Plan clearly oversteps. The evidence points to the fact that the federal land management agencies are promulgating and implementing regulatory burdens on the Western grazing industry in defiance of the intent of Congress. They are creating potentially insurmountable challenges to the families involved in Utah public lands livestock ranching as a viable and sustainable component of the future, culture and economy generated from the public lands. For these reasons, we urge the BLM and FS to adopt a "No Change" option and allow continued multiple use of the public lands within the Bears Ears National Monument. Until the unlawful excessive size is reduced to reflect the Congressional mandate and original intent of "the smallest area needed to protect the unique characteristics."	DECI07; YES02	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Consequences section, under the subheaders for Economic Contributions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in the Environmental Consequences section, under the subheaders for Social Conditions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. As described in Appendix B, Laws, Regulations, Policies, and Plans Considered in the Development of the Resource Management Plan and Environmental Impact Statement, the Antiquities Act of 1906 was considered in the development of the RMP/EIS. The decision about which lands are reserved as part of BENM is outside the scope of this plan. The size of the Monument reservation is determined by the President and is outside the scope of this planning effort.
14767-59	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	G. Cultural Resources 1. The BLM will identify priority areas within NLCS units for nomination to the National Register of Historic Places, for cultural resource inventories, and for archaeological research consistent with the BLM 8100 manual series (Cultural Resources Management). Inventory priorities will be determined at least in part by resource values and the risk of disturbance, including loss of the resource to theft or erosion. 2. The BLM will monitor the condition of historic properties and traditional use areas within NLCS units for vandalism and other disturbances or changes. Again, the alternatives and proposed RMP failed to implement these requirements. planning to plan provided in the DRPM fails to comply with this requirement.	DECI07-Compliance with other laws and policies	Ongoing archaeological inventory and monitoring would occur under the Proposed Plan. Priorities for inventory and monitoring would be established in the CRMP that would be required under the Proposed Plan. Additionally, the Proposed Plan under Cultural Resources states "The agencies would conduct Class III/Intensive level cultural resource inventories in a manner that complies with Section 110 of the NHPA which requires nomination of historic properties and prioritization of preservation activities." Section 106 (now 54 USC 306108) of the NHPA is a procedural requirement under the statute. The NHPA, however has multiple provisions, some of which do mandate the agencies to preserve historic properties. The language in the section of the NCL Manual uses language from Section 110 of the NHPA (now 54 USC 306102), which is incorporated into BLM policy on cultural resources generally, see 8100 manual.
889-62	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Two especially concerning provisions of the preferred alternative E would allow the tribes, through the Bears Ears Commission, to nominate areas for seasonal closure based on tribal religious beliefs regarding the concept of resource rest, and for complete closure to all public entry, except presumably for tribal members. We strongly oppose both of these provisions as they directly allow the tribes to close off entire areas of the monument to non-natives solely on the basis of tribal religious beliefs, and thereby constitute unconstitutional discrimination based on both religion and race/ethnicity.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations.
14767-181	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under Alternative C, 90% (1,194,529 acres) would be available for grazing (29,291 acres fewer than under Alternative A), with 33% (397,313 acres) of grazing lands classified as PFYC Classes 4 and 5. These areas could have increased erosion from surface disturbance through construction of support structures (e.g., stock ponds, dams, roads) or trampling and reduction in vegetation from grazing; however, this reduced acreage would protect these areas from impacts to paleontological resources from grazing as described in Section 3.4.1.2.2. So we find the BLM openly admitting that their authorized actions with degrade and destroy objects they are mandated to protect and restore. This again demonstrates that BLM is applying their usual multiple use framework, to lands that are exempted by statute from that framework and have failed to comply with their NLCS directives.	DECI07-Compliance with other laws and policies	Impacts of livestock grazing on paleontological resources are discussed in the Paleontological Resources and Geology Section of Chapter 3. See the Paleontological Resources and Geology section of Chapter 2 in the Proposed Plan for actions to protect paleontological resources.
14767-77	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	8.1.2 Process for Determining Appropriate Uses All proposals for park uses will be evaluated for consistency with applicable laws, executive orders, regulations, and policies; consistency with existing plans for public use and resource management; actual and potential effects on park resources and values; total costs to the Service; and whether the public interest will be served. Superintendents must continually monitor and examine all park uses to ensure that unanticipated and unacceptable impacts do not occur. Superintendents should also be attentive to existing and emerging technologies that might further reduce or eliminate impacts from existing uses allowed in parks. Unless otherwise mandated by statute, only uses that meet the criteria listed in section 8.2 may be allowed. If, in monitoring a park use, unanticipated impacts become apparent, the superintendent must further manage or constrain the use to minimize the impacts, or discontinue the use if the impacts are unacceptable. (emphasis added) Lets go through each of these critical requirements individually. 1) The EIS must fully analyze the consistence of the proposed actions with all applicable laws, executive orders, regulations, policy and plans. 2) The EIS must also fully analyze all actual and potential effects on park resources and values. 3) The EIS must disclose total costs of the proposed actions to the Service 4) The EIS must fully and honestly analyze whether the larger public interest will be served by the proposed action in comparison with the no grazing alternative 5) The EIS and ROD must provide a fully funded and staffed monitoring plan to continually monitor and examine all park uses to ensure that unanticipated and unacceptable impacts do not occur 6) The EIS must fully analyze whether the proposed actions fully comply with the criteria in the Policies at Section 8.2. If any use proposed does not comply with Section 8.2 they can not be permitted in the ROD 7) The EIS and ROD must implement the requirement that if unanticipated impacts become apparent, the superintendent must further manage or constrain the use to minimize the impacts, or discontinue the use if the impacts are unacceptable	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-185	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Disturbance to soils from livestock grazing activities include water developments, range improvements, and cattle movement. See Section 3.4.6 for a discussion of current uses and impacts. The impacts to soils resulting from these disturbances include increased compaction, decreased infiltration rates, increased erosion rates, and reduced nutrient cycling. Despite admitting that livestock grazing degrades and damages soils, which by definition violates its protect and restore mandate, the BLM plows ahead demonstrating that BLM is applying their usual multiple use framework, to lands that are exempted by statute from that framework and have failed to comply with their NLCS directives.	DECI07-Compliance with other laws and policies	Impacts from livestock grazing on soil resources are discussed in Chapter 3 Soils and Biological Crusts. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects.
889-112	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Allegations of user conflict based on general subjective management preferences are therefore really just social value conflicts, even when disguised in the language of interpersonal conflicts. These conflicts largely exist solely in the minds of intolerant non-motorized users who refuse to peacefully coexist with other users of public lands, but demand that they be given exclusive access to trails that have historically been managed for multiple use. It would be highly unfair to exclude motorized users based solely on the attitudes and opinions of non-motorized users, punishing them for the intolerance of others. These kinds of manufactured user conflicts and claimed harm to quiet use recreation in areas that are designated for motorized use should not be used as a basis to close motorized routes. When the agencies close a motorized route because of alleged user conflicts, what it is really doing is depriving motorized users of recreational opportunities in order to give exclusive access to non-motorized users. This is antithetical to the Forest Services Travel Management Rule, which recognizes that, Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests, and again, Motor vehicles remain a legitimate recreational use of NFS lands. Travel Management; Designated Routes and Areas for Motor Vehicle Use, 70 Fed. Reg. 68264, 68272 (November 9, 2005). Motorized recreation is a legitimate, co-equal form of recreational activity that is by no means inferior to hiking, biking, horseback riding, or other so-called quiet uses. The BLM and Forest Services travel management regulations which require them to minimize user conflicts were never intended as a mandate to disfavor motorized recreation and to favor other forms of recreation by depriving motorized users of routes in order to award them to others. Yet that is precisely what the agencies would be doing if they considered assertions of user conflict by non-motorized users sufficient justification to close motorized routes. (While we acknowledge the agencies are not making route-specific travel management decisions in this process, the Monument Management Plan would indirectly close motorized routes by putting them in non-motorized ROS zones or incompatible management areas, thereby mandating their eventual closure.) That approach inherently presumes the superiority of non-motorized recreation and the inferiority of motorized recreation. It presumes that the subjective desires and qualitative recreational experiences of non-motorized users are more important than the desires and recreational experiences of motorized users, so that when in conflict, the desires of non-motorized users must prevail. This view is directly contrary to the Travel Management Rule. It inherently treats motorized recreation as an illegitimate, inappropriate, and disfavored activity that is to be allowed only when it does not inconvenience other more favored user groups. It allows motorized users to be excluded from public lands simply because other people dont like them.	DECI07-Compliance with other laws and policies	The agency has the authority to manage recreational uses through implementation level travel management planning following the process outlined in BLM H-8342 Travel and Transportation Handbook. The handbook states: "Areas, roads, and/or trails are designated closed if closure to all OHV use is necessary to protect resources, promote visitor safety or reduce user conflicts." Motorized routes will be designated under travel management planning, which will be an implementation-level effort. OHV closed area designations are not made out of a preference for one kind of recreation over another, but rather to provide adequate protections to Monument objects, special designation areas, and other resources.
18657-25	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Excluding access to public lands raises concerns related to the First Amendment rights of U.S. citizens, particularly the rights to freedom of speech and assembly. Public lands, especially those like parks and monuments, are considered traditional public forums. In these spaces, citizens have the highest level of protection for their First Amendment rights, including speech and assembly. Restrictions on access therefore impose a limitation of these rights. The Supreme Court has established that any restrictions on speech in public forums must be narrowly tailored to serve a significant governmental interest and leave open ample alternative channels for communication (Perry Education Association v. Perry Local Educators' Association, 1983). Public lands are frequently used for expressive activities, including protests, demonstrations, and rallies. Restricting access to these lands impedes citizens ability to exercise their rights to free speech and peaceful assembly. For example, in Clark v. Community for Creative Non-Violence (1984), the Supreme Court held that while the government can impose reasonable restrictions on the time, place, and manner of expression in public forums, such restrictions must not be more extensive than necessary to serve a substantial government interest and must leave open ample alternative channels for communication.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations.
889-18	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The proposed restrictions on launching and landing drones within the monument in all of the action alternatives likely violate the First Amendments guarantees of freedom of speech and expression. A recent decision by a federal district court in Texas held that drone photography is a protected form of First Amendment expression, and struck down as unconstitutional a state law that imposed unreasonable restrictions on using drones for photography. The proposed drone restrictions in the Bears Ears management plan are similar to the no-fly zone provisions in the Texas state law. The BLM and Forest Service would likely claim state interests in preserving natural soundscapes as the reasons behind the proposed restrictions on drone flying. However the proposed restrictions (particularly in alternatives C, D, and E which would ban drones from being flown in the monument altogether) are not narrowly tailored to meet these interests, nor are they actually necessary to further them. As discussed in more detail below, there is no evidence that drone flying within the	DECI07-Compliance with other laws and policies	Drone use in airspace is managed by the Federal Aviation Administration Civil Operations Part 107. However, the agencies have the authority to manage the landing or taking off of drones on BLM-administered and NFS lands. Restrictions concerning where drones can be operated in the Proposed Plan for the purpose of protecting BENM objects is consistent with applicable law. Note that with respect to the Texas law referenced in the comment, the U.S. Court of Appeals for the Fifth Circuit found that the operation of a drone is not inherently expressive and, therefore, the Texas statutes regulating the ability to fly drones do not implicate the First Amendment.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			monument causes any significant harm to soundscapes, and such harms are completely theoretical. These alternatives also treat drones differently than other noise producing machines, as in all alternatives drones would be prohibited from being flown near roads that allow far noisier motorized vehicles. None of these reasons provide sufficient justification for banning an important form of First Amendment protected speech creation across large portions of the national monument, let alone the entire monument. The proposed drone restrictions in the action alternatives would be highly unlikely to survive a First Amendment challenge, and thus we urge the agencies to abandon them or at least significantly scale back the proposed restrictions in the draft management plan.		
889-2	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We are particularly concerned that the agencies undue deference to the preferences of the Bears Ears Intertribal Coalition / Bears Ears Commission will unconstitutionally restrict public access to public lands primarily on the basis of Native American religious beliefs, in violation of the Establishment Clause of the First Amendment. The proposed management plan will inevitably result in excessive entanglement between religion and federal land management, by restricting the activities of non-Indians on federal lands solely because of Indian religious beliefs about the alleged sacredness of this landscape. The Indian tribes represented by the Bears Ears Intertribal Coalition (BEITC) are but one of many stakeholders in the future of Bears Ears National Monument, and we are disappointed to see the agencies bending over backwards to cater to their exclusionary and self-centered preferences for how the monument should be managed. We submit that Native American religious beliefs are not a valid basis for federal land management policy, and that any attempt to restrict recreation based on Native American religious beliefs or give Native American religious practitioners preferential treatment over the general American public is contrary to the First Amendment and vulnerable to constitutional challenge.	DECI07-Compliance with other laws and policies	The Proposed Plan would not restrict public access in a way that favors any specific groups or religions. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
889-29	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We note that the Arch Canyon road is claimed by San Juan County and the State of Utah as an R.S. 2477 route, and the BLM has officially recognized its R.S. 2477 status in the past though that recognition was later withdrawn. As such, it is unlawful to close it, and any attempt to do so will likely be overturned in court when it is inevitably challenged by the state. Thus the most this planning process could accomplish is to temporarily close the road for a few years until the State of Utah has its day in court.	DECI07-Compliance with other laws and policies	Under the Proposed Plan, Arch Canyon is not designated as OHV closed. Motorized and non-motorized use in Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
10626-17	Debra Van Putten		The manner in which the EIS was prepared and the ends it seeks to accomplish are not supported by any statutory grant of authority and violate the a number of statutory mandates, which undermines the acceptability of Alternatives B-E. First, the BLM has departed from federal environmental policy. Per 42 USC 4332: The Congress authorizes and directs that, to the fullest extent possible: (1) the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this chapter, and (2) all agencies of the Federal Government shall (A) utilize a systematic, interdisciplinary approach which will ensure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on mans environment; (B) identify and develop methods and procedures, in consultation with the Council on Environmental Quality established by subchapter II of this chapter, which will ensure that presently unquantified environmental amenities and values may be given appropriate consideration in decisionmaking along with economic and technical considerations; (C) consistent with the provisions of this chapter and except where compliance would be inconsistent with other statutory requirements, include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on (i) reasonably foreseeable environmental effects of the proposed agency action; (ii) any reasonably foreseeable adverse environmental effects which cannot be avoided should the proposal be implemented; (iii) a reasonable range of alternatives to the proposed agency action, including an analysis of any negative environmental impacts of not implementing the proposed agency action in the case of a no action alternative, that are technically and economically feasible, and meet the purpose and need of the proposal; (iv) the relationship between local short-term uses of mans environment and the maintenance and enhancement of long-term productivity; and (v) any irreversible and irretrievable commitments of Federal resources which would be involved in the proposed agency action should it be implemented. Prior to making any detailed statement, the head of the lead agency shall consult with and obtain the comments of any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved. Copies of such statement and the comments and views of the appropriate Federal, State, and local agencies, which are authorized to	DECI07-Compliance with other laws and policies	See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS. See Appendix N for the affected environment. See Chapter 3 Affected Environment and Environmental Consequences for impacts from management actions in the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			develop and enforce environmental standards, shall be made available to the President, the Council on Environmental Quality and to the public as provided by section 552 of title 5, and shall accompany the proposal through the existing agency review processes; (D) ensure the professional integrity, including scientific integrity, of the discussion and analysis in an environmental document; (emphasis supplied) While there are ample boilerplate citations filling the pages of the EIS, a scientific analysis of Bears Ears, the alternatives, and environmental goals is wholly wanting. The cited analysis supporting closures of land noise, erosion, full campgrounds on holiday weekends etc. is not attached as an exhibit. The only analysis is at Exhibit L, the wish list from the Native American Tribes. Every other stitch of the EIS is simply rehashed descriptions of the plans, cut and sliced so many times they are no longer internally consistent.		
10626-18	Debra Van Putten		Second, the BLM has departed from its statutory mandate for basing federal land management decisions on science, not religion. 43 U.S.C. 1712 provides: c) Criteria for development and revision. In the development and revision of land use plans, the Secretary shall- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law; (2) use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences; Despite the clear statement in statute as to acceptable sources data upon which Federal Land planning and management may be accomplished, Bidens Bears Ears Proclamation purports to require the use of Native Knowledge instead. The proclamation reads in relevant part: In recognition of the importance of knowledge of Tribal Nations about these lands and objects and participation in the care and management of the objects identified above, and to ensure that management decisions affecting the monument reflect expertise and traditional and historical knowledge of Tribal Nations, a Bears Ears Commission (Commission) is reestablished in accordance with the terms, conditions, and obligations set forth in Proclamation 9558 to provide guidance and recommendations on the development and implementation of management plans and on management of the entire monument.	DECI07-Compliance with other laws and policies	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
10626-19	Debra Van Putten		In addition, the gist of much of the Native comments that only Native Americans can properly understand the land and that Bears Ears should be managed primarily to conform with Native American Beliefs, is utterly inconsistent with the statutory policy of multiple use: The term "multiple use" means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. By law, Bears Ears is to be managed for the benefit of the American people as a whole, not a certain subset. The EIS cannot proceed with these legal and constitutional defects.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations. The Introduction of the RMP/EIS states, "The Federal Land Policy and Management Act of 1976 (FLPMA) establishes the policy of the United States concerning the management of federally owned land administered by the BLM agencies. The BLM "shall manage the public lands under principles of multiple use and sustained yield . . . except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law" (43 United States Code [USC] 40 1732(a)). Proclamation 10285—in accordance with the Antiquities Act of 1906—dedicated the lands in BENM to specific uses by designating the Monument and reserving the entirety of the lands in the boundary of BENM as the smallest area compatible with the protection of its objects. The Omnibus Public Land Management Act of 2009 (Public Law 111-11) requires units of the National Conservation Lands, which includes BENM, to be managed “in accordance with any applicable law (including regulations) relating to any component of the system . . . and . . . in a manner that protects values for which the components of the system were designated.”
10626-30	Debra Van Putten		Comments of this religious, not scientific, approach to management are echoed throughout the EIS assessment as explanations for limiting access. For example, at pages 3-404-5, in the discussion about reasons for closing access to dispersed camping, BLM observes, In that same vein, the Hopi are concerned about disturbance in BENM having an effect on ancestral spirits. Visitation for Indigenous peoples to BENM is typically accompanied by prayers and offerings (see Appendix L). apparently adopting Hopi religious beliefs as a valid basis for federal land management. This is not consistent with statutory limitations and violates the Constitutional prohibition on establishment of religion. It would be a violation of my free exercise of religion to force me to make Hopi prayers upon entering Bears Ears. It is not within the purview of federal land managers or federal land policy to appease alleged ancestral spirits. There is no guidance as to how federal land managers would resolve disputes among the various deceased from potentially rival Tribes or Mormon settlers. Additionally, there is no objective measurement to assess if said ancestors have been effectively appeased. Beyond these religious statements, there is no description of how Native Wisdom is going to be implemented in a practical sense. Constant fires to remove brush? No fires ever? Remove all roads? Move the people residing at the relevant reservations onto Bears Ears? That is usually the stock in trade of a NEPA analysis and it is entirely missing, so it is impossible to comment on. The EIS must be redone to comply with federal law.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument and ensure the management of the Monument is guided by the expertise of Tribal Nations and traditional and historical knowledge of the area.
10626-8	Debra Van Putten		As to the alternatives, alternative A is unacceptable as it does not address the lack of appropriate disability accommodations. Pretty much every time I cross onto federal property with any kind of scenic value, there are maps provided identifying points of interest. If a point of interest is accessible by a trail, the surface of the trail (paved, hard ground, sandy, rocky) is disclosed, and the walking distance is set out. If the area is not heavily travelled, the maps are put in a container. Bears Ears	DECI07-Compliance with other laws and policies	The BLM manages motorized recreation act in accordance with applicable law and the Rehabilitation Act.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			does not provide that very basic reasonable accommodation and is statutorily required to do so. I have been told by the Bears Ears Education Center that they were told by BLM to remove locations of artifacts from their maps so that they would be hidden from the public. Additionally, I note that most of the bathrooms do not have solid surfaces leading to them (Exhibit J), and in fact many are surrounded by sand, including deep sand. (Mobility impaired people can ride in jeeps and side by sides but they still have bathroom needs). The Comb Wash/Arch canyon camping area most certainly could accommodate a paved handicapped camping site or two (there appear to be zero in the entire monument.) This lack of accommodations has precluded me from exploring the whole of Bears Ears, including such things are the ruins off of Comb Wash Road. I cant possible delineate what else Ive missed because of the lack of information. The BLM and its lands are subject to Section 504 of the rehabilitation act, and so remediation is mandatory: No otherwise qualified individual with a disability in the United States, as defined in section 705 (20)(link is external) of this title, shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service. The head of each such agency shall promulgate such regulations as may be necessary to carry out the amendments to this section made by the Rehabilitation, Comprehensive Services, and Development Disabilities Act of 1978. Copies of any proposed regulations shall be submitted to appropriate authorizing committees of the Congress, and such regulation may take effect no earlier than the thirtieth day after the date of which such regulation is so submitted to such committees. See also 29 CFR Part 32 and 29 CFR Part 37. I have seen BLM commentary that it has no obligations to accommodate the disabled, but that is not true. The Bears Ears Monument is sufficiently hostile that it appears to not recognized federal disability passes that waive day fees and portapotties located along roadways are not sized for wheelchair use. (Exhibit K) All pets are forbidden in select areas with no accommodation for those using assistance animals.		
14767-100	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	8.6.8.2.1 Permitting Agricultural Grazing Agricultural livestock activities by parties other than the Park Service will be conducted only pursuant to the terms and conditions of a special use permit or lease. The use of a lease is appropriate only when (1) specifi cally authorized by the parks enabling legislation, or (2) it is part of an historic preservation program authorized by 16 USC 470h-3, or (3) the livestock use is associated with a building that is leased pursuant to 16 USC 1a-2(k). In addition to any other penalty provisions, violation of the terms and conditions of the permitting instrument may result in revocation of the livestock use privilege. 8.6.8.2.2 Structures for Agricultural Grazing Appropriate structures may be approved by the National Park Service and may be allowed in parks when the structures are consistent with a livestock management plan or another appropriate management plan; are consistent with park purposes and other applicable laws, regulations, or policies; and will not cause unacceptable impacts on park resources and values. The Service will not expend funds to construct or maintain livestock structures unless there is a direct benefit to the protection of park resources. The following requirement must be implemented in all alternatives	DECI07-Compliance with other laws and policies	Management of the Monument is under the jurisdiction of the USDA Forest Service and BLM. See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS and for which the EIS is compliant. The BLM coordinates with the NPS through a 2019 Memorandum of Understanding on the management of livestock grazing where grazing allotments span land managed by both agencies.
14767-101	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	8.6.8.3 Trespass and Feral Livestock Livestock trespassing on park lands may be impounded and disposed of pursuant to the provisions of 36 CFR 2.60, with the owner charged for expenses incurred. Wild living or feral livestock having no known owner may also be disposed of in accordance with 36 CFR 2.60. In the establishment of GCNRA, Congress directed that The administration of grazing leases within the recreation area shall be by the BLM. The same policies followed by the BLM in issuing and administering grazing leases on other lands under its jurisdiction shall be followed in regard to lands within the boundaries of the recreation area, subject to provisions of Section 3(a) and 4 of this Act What this means is that while the BLM is directed to administer any grazing leases that the NPS may allow in GCNRA, it must do so fully in accordance with Section 3(a) and 4 of the Act creating the Park. This requires that all actions within the Park comply with: Sec. 4. The Secretary shall administer, protect, and develop the recreation area in accordance with the provisions of the Act of August 25th, 1916 (39 Stat. 536; 16 U.S.C. 1 et seq.), as amended and supplemented, and with any other statutory authority available to him for the conservation and management of natural resources to the extent he finds such authority will further the purposes of this Act: So any action or plan that covers any NPS lands, whether undertaken by the NPS or the BLM must be informed by and fully comply with the Organic Act, the Redwoods Act, NPS Policy 2006, and all other applicable NPS requirements such as Directors Orders and, Reference Manuals. Since the BLM has completely ignored these requirements repeated over the decades, we have provided a review of some of the key considerations that a legally compliant EIS and RMP must implement, above.	DECI07-Compliance with other laws and policies	Management of the Monument is under the jurisdiction of the USDA Forest Service and BLM. See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS and for which the EIS is compliant. The BLM coordinates on the management of livestock grazing with NPS where grazing allotments span land managed by both agencies.
14767-102	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The Organic Act requires: [The National Park Service] shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. (16 USC 1) Congress supplemented and clarified these provisions through enactment of the General Authorities Act in 1970, and again through enactment of a 1978 amendment to that act (the Redwood amendment,	DECI07-Compliance with other laws and policies	Management of the Monument is under the jurisdiction of the USDA Forest Service and BLM. See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS and for which the EIS is compliant. The BLM coordinates with the NPS through a 2019 Memorandum of Understanding on the management of livestock grazing where grazing allotments span land managed by both agencies.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			contained in a bill expanding Redwood National Park), which added the last two sentences in the following provision. The key part of that act, as amended, is as follows: Congress declares that the national park system, which began with establishment of Yellowstone National Park in 1872, has since grown to include superlative natural, historic, and recreation areas in every major region of the United States, its territories and island possessions; that these areas, though distinct in character, are united through their inter-related purposes and resources into one national park system as cumulative expressions of a single national heritage; that, individually and collectively, these areas derive increased national dignity and recognition of their superlative environmental quality through their inclusion jointly with each other in one national park system preserved and managed for the benefit and inspiration of all the people of the United States; and that it is the purpose of this Act to include all such areas in the System and to clarify the authorities applicable to the system. Congress further reaffirms, declares, and directs that the promotion and regulation of the various areas of the National Park System, as defined in section 1c of this title, shall be consistent with and founded in the purpose established by section 1 of this title [the Organic Act provision quoted above], to the common benefit of all the people of the United States. The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress. (16 USC 1a-1) The Senate committee report stated that under the Redwood amendment, The Secretary has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever actions and seek whatever relief as will safeguard the units of the national park system. (emphasis added) Since the RMP directs management on NPS lands, it must provide the requirements necessary to comply with the above cited mandates.		
14767-107	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The RMP failed to implement the MSO Recovery Plan or similar direction for the recovery of listed species.	DECI07-Compliance with other laws and policies	As described in Appendix B, the Mexican Spotted Owl Recovery Plan was considered during development of the RMP/EIS.
14767-114	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	ES-2: Accordingly, the agencies underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide management of BENM, consistent with the protection of BENM objects, and other applicable laws, regulations, and policies. But the EIS fails to even list the objects or provide any rationale how the proposed extractive uses comply with law, regulation and policy. Most of the applicable policy documents for NLCS units are not even mentioned, let alone, rationale as to compliance. 7 Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects. Again, the EIS fails to provide any rationale, not simply bald assertions, that livestock grazing is consistent with the protection of BENM objects, let alone the recovery of degraded object.	DECI07-Compliance with other laws and policies	Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." See Chapter 3 for a discussion of impacts of livestock grazing on resources and uses within BENM.
14767-115	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	ES-3 Throughout the EIS we see statements such as: How would existing and proposed management prescriptions (such as those made for livestock grazing, recreation, and lands and realty actions) and discretionary uses affect terrestrial vegetation, including special status plant species? This, and the many similar statements ,indicate that the BLM is considering livestock grazing as not a discretionary use. This failure pollutes the entire EIS process and the resultant alternatives and DRMP because the BLM treats livestock grazing as if it must continue as the status quo, which directly contradicts the clear meaning to FLMPA Section 302 (a), The Omnibus Public Lands Act of 2009, The NLCS Secretarial Order and all of the BLMs own NLCS directives.	DECI07-Compliance with other laws and policies	The issue statement was updated to clarify discretionary uses.
14767-116	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	ES-4 All the alternatives have essentially identical authorized livestock grazing. There is no meaningful range of alternatives. Stunningly, Alternative C states it would allow discretionary actions only if necessary to protect BENM objects yet permits the same livestock grazing as has occurred for the last century that has severely degraded water, soils, vegetation and cultural resources. This demonstrates once again that the BLM has disregarded the plain meaning of The Omnibus Public Lands Act of 2009, the NLCS Secretarial Order and all of the BLMs own NLCS directives.	DECI07-Compliance with other laws and policies	Under the Proposed Plan, the 162,217 acres would be made unavailable/not suitable to grazing.. Grazing management in the Proposed Plan is designed to protect resources, including objects of BENM. Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." Grazing is a discretionary action and agencies can under existing laws and regulations suspend or cancel permits and to close areas to grazing either temporarily or long-term.
14767-118	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	ES-11 No discretionary activities would be allowed on slopes greater than 35% and discretionary actions on slopes between 21 percent and 35 percent would require erosion control plans. Again we see the BLM maintaining that livestock grazing is a mandatory, not discretionary use in clear contradiction to FLMPA Section 302 (a), The Omnibus Public Lands Act of 2009, The NLCS Secretarial Order and all of the BLMs own NLCS directives.	DECI07-Compliance with other laws and policies	The Proposed Plan clarifies this management action applies to surface-disturbing discretionary actions in In Chapter 2 Soil Resources, Management Actions by Alternative.
14767-122	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	ES-28 Methane emission from livestock grazing is the primary source of impacts to climate change from authorized activities in the Planning Area (Kauffman et al. 2022). Under Alternatives B, C, and E, emissions would be the same as under Alternative A. Alternative D, with 6% fewer AUM and 25% fewer HM allocations, would result in 12% fewer emissions compared with Alternative A. Setting aside the fact that all the alternatives authorize essentially the same amount of livestock grazing, the issue here is beyond the impact to climate change from the permitted livestock, the issue is the impact from climate change on the objects (vegetation, soils and water) that the current allocations are based on. The EIS ignored that foundational issue. In 1-1, the BLM rightfully cites FLPMA Section	DECI07-Compliance with other laws and policies	See Chapter 3 Soils and Biological Crusts, Water Resources, and Terrestrial Habitat and Vegetation Resilience and Conservation for a discussion of impacts to vegetation, soils, and water resources from climate change.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			302 (a) but then promptly ignores the obvious implications, that BENM is no longer under the multiple use framework and that it has been dedicated to specific uses of the protection and restoration of the landscape and the objects. The BLM clings to its resource extraction mentality and refuses to comply with the FLPMA exemption. This is the fatal flaw of the EIS and its DRMP.		
14767-124	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The increased demand on BENMs resources, and subsequently, Monument objects, poses a challenge to balance the wide variety of uses of the landscape with the protection of Monument objects. Planning decisions can define resource uses and land designations to help resolve conflicts between various uses and object protection. Again, the BLM displays its purposeful ignorance of FLMPA Section 302 (a), The Omnibus Public Lands Act of 2009, The NLCS Secretarial Order and all of the BLMs own NLCS directives. There is no balance between extractive uses and protection and restoration on lands exempted from multiple use by FLPMA Section 302 (a) and the Omnibus Public Lands Act of 2009, as there is on regular BLM lands.	DECI07-Compliance with other laws and policies	See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS and for which the EIS is compliant.
14767-126	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Needs and challenges: Public visitation, permitted activities, and climate change have the potential to impact cultural resources. Here again, the BLM demonstrates its purposeful lack of understanding of FLMPA Section 302 (a), The Omnibus Public Lands Act of 2009, the NLCS Secretarial Order and all of the BLMs own NLCS directives. By definition, all impacts to cultural resources are both permanent and cumulative. The Omnibus Public Lands Act of 2009, the NLCS Secretarial Order and all of the BLMs own NLCS directives do not allow a balanced degradation of objects by discretionary uses. They mandates that discretionary uses, like private livestock grazing are not allowed in they do not protect and restore objects.	DECI07-Compliance with other laws and policies	Under the Proposed Plan, the 162,217 acres would be made unavailable/not suitable to grazing. The agencies clarified the issues statement for Terrestrial Habitat and Vegetation to clarify discretionary uses. Grazing management in the Proposed Plan is designed to protect resources, including objects of BENM. Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." Grazing is a discretionary action, and agencies can under existing laws and regulations suspend or cancel permits and to close areas to grazing either temporarily or long-term.
14767-130	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Needs and challenges: Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape. This further demonstrates that the BLM failed to comply with FLPMA 302 (a), The Omnibus Public Lands Act of 2009, the NLCS Secretarial Order and all of the BLMs own NLCS directives do not allow a balanced degradation of objects by discretionary uses. They mandate that discretionary uses, like private livestock grazing are not allowed in they do not protect and restore objects. Under FLPMA Section 302 (a), it does not matter if a resource extraction use is important to the local economy. That is entirely irrelevant in the context of FLPMA 302(a), The Omnibus Public Lands Act of 2009, the NLCS Secretarial Order and all of the BLMs own NLCS directives.	DECI07-Compliance with other laws and policies	The agencies clarified the issues statement for Terrestrial Habitat and Vegetation to clarify discretionary uses. Grazing management in the Proposed Plan is designed to protect resources, including objects of BENM. Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." Grazing is a discretionary action, and agencies can under existing laws and regulations suspend or cancel permits and to close areas to grazing either temporarily or long-term.
14767-134	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The Rangeland Health regulations have been in place for well over a quarter of a century, yet the majority of BENM has never had a rangeland health assessment done yet. The few that have had evaluations are mostly well over a decade old. Yet the BLM is hiding behind some undisclosed review that has found the opposite of what the agency has been finding for decades. This does not comply with NEPAs hard look requirement.	DECI07-Compliance with other laws and policies	The Proposed Plan includes prioritizing 6 allotments for the completion of rangeland health assessments within 3 years and NEPA within 6 years of the signing of the ROD. In Chapter 2, Livestock Grazing, the Proposed Plan would prohibit new water developments and range improvements unless the primary purpose is to protect BENM objects or a current land health assessment has been completed within the last 10 years.
14767-165	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	All the action alternatives commit to allocating a specific amount of AUMs but the EIS and DRMP are entirely silent as to if those AUMs actually exist or whether that allocation protects and restores all objects. This, of course, violates NEPAs hard look requirements as well as FLPMA Section 302 (a), the Omnibus Public Lands Act, the Secretarial Order and the various NLCS directives.	DECI07-Compliance with other laws and policies	The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined in the Livestock Grazing section of Chapter 2. Livestock management can be adjusted as necessary to meet these objectives for rangeland health. The Proposed Plan would not alter currently allocated AUMs as outlined in Chapter 2 Livestock Grazing. Modifications to AUMs would be done at the site-specific implementation level planning process. In the Proposed Plan, the agencies have committed to developing Allotment Management Plans in order to further manage livestock grazing.
14767-170	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Livestock salt blocks and other nutritional supplements will be located away from riparian/wetland areas or other natural water sources. It is recommended that the locations of these supplements be moved, as needed, to reduce resource impacts. Again, the BLM is prioritizing livestock production over the protection and restoration of objects. Reducing impacts is not protection and restoration.	DECI07-Compliance with other laws and policies	Chapter 2, Livestock Grazing, Management Actions Common to All Alternatives states that livestock grazing will be managed in a manner consistent with the protection of BENM objects and practices will be adapted as necessary to maintain or make progress toward meeting rangeland health standards. Locating salt blocks and other nutritional supplements away from riparian/wetland areas and other natural water sources protects those features by drawing cattle away.
14767-179	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under Alternative A, 89% (1,223,820 acres) of land within the Planning Area would be available for grazing, of which 33% (408,932 acres) of grazing lands are classified as PFYC Classes 4 and 5. Areas available for grazing could have increased erosion from surface disturbance through construction of support structures (e.g., stock ponds, dams, roads) or trampling and reduction in vegetation from grazing. Less than 1% (5,229 acres) of land within the Planning Area would be available for trailing only or trailing only/emergency grazing. The remaining land (135,007 acres) within the Planning Area under Alternative A would be unavailable for grazing, of which 15% (21,284 acres) is classified as PFYC Classes 4 and 5. So we find the BLM openly admitting that their authorized actions with degrade and destroy objects they are mandated to protect and restore. This again demonstrates that	DECI07-Compliance with other laws and policies	Impacts of livestock grazing on paleontological resources are discussed in Chapter 3 Paleontological Resources. See paleontological resources section in the Proposed Plan for actions to protect paleontological resources.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			BLM is applying their usual multiple use framework, to lands that are exempted by statute from that framework and have failed to comply with their NLCS directives.		
14767-180	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under Alternative B, 87% (1,194,529 acres) of land within the Planning Area would be available for grazing (29,291 acres fewer than Alternative A), and of these available grazing lands, 33% (404,134 acres) are classified as PFYC Classes 4 and 5 (7%, or 84,793 acres, are classified as PFYC Class U). These areas could have increased erosion from surface disturbance through construction of support structures (e.g., stock ponds, dams, roads) or trampling and reduction in vegetation from grazing; however this reduced acreage would protect these areas from impacts to paleontological resources from grazing, as described in Section 3.4.1.2.2. So we find the BLM openly admitting that their authorized actions with degrade and destroy objects they are mandated to protect and restore. This again demonstrates that BLM is applying their usual multiple use framework, to lands that are exempted by statute from that framework and have failed to comply with their NLCS directives.	DECI07-Compliance with other laws and policies	Impacts of livestock grazing on paleontological resources are discussed in Chapter 3 Paleontological Resources, Impacts Common to All Alternatives. See the paleontological resources section in the Proposed Plan for actions to protect paleontological resources.
14767-182	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under Alternative D, 69% (953,692 acres) would be available for grazing (270,123 acres fewer than Alternative A), with 37% (355,500 acres) of grazing lands classified as PFYC Classes 4 and 5. Paleontological resources in these PFYC Class 4 and 5 areas could be at risk for increased erosion from surface disturbance through construction of support structures (e.g., stock ponds, dams, roads) or trampling and reduction in vegetation from grazing; however, this acreage in PFYC Classes 4 and 5 available for grazing is greatly reduced from Alternative A. This reduction in acreage would help protect these areas from impacts to paleontological resources from grazing, as described in Section 3.4.1.2.2. So we find the BLM openly admitting that their authorized actions with degrade and destroy objects they are mandated to protect and restore. This again demonstrates that BLM is applying their usual multiple use framework, to lands that are exempted by statute from that framework and have failed to comply with their NLCS directives.	DECI07-Compliance with other laws and policies	Impacts of livestock grazing on paleontological resources are discussed in Chapter 3 Paleontological Resources, Impacts Common to All Alternatives. See the paleontological resources section in the Proposed Plan for actions to protect paleontological resources.
14767-183	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under Alternative E, 87% of the Monument (1,194,529 acres) would be available for grazing (29,291 acres fewer than under Alternative A), with 33% (404,134 acres) of grazing lands classified as PFYC Classes 4 and 5 (same as Alternative B). These areas could have increased erosion from surface disturbance through construction of support structures (e.g., stock ponds, dams, roads) or trampling and reduction in vegetation from grazing; however, the additional actions under Alternative E, including prioritization of review and processing of grazing permits and leases; identifying subareas of allotment necessary for closure; reassessment of stocking levels and season of use; and identifying resource thresholds, monitoring, and automatic responses related to land health and/or impacts to cultural and sacred resources could reduce such impacts. So we find the BLM openly admitting that their authorized actions with degrade and destroy objects they are mandated to protect and restore. This again demonstrates that BLM is applying their usual multiple use framework, to lands that are exempted by statute from that framework and have failed to comply with their NLCS directives.	DECI07-Compliance with other laws and policies	Impacts of livestock grazing on paleontological resources are discussed in Chapter 3 Paleontological Resources, Impacts Common to All Alternatives. See the paleontological section in the Proposed Plan for actions to protect paleontological resources.
14767-191	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.2.2.2, we see: Several management actions are anticipated to have impacts on soil resources, which are discussed below. Actions that could impact soil resources include ground-disturbing activities associated with ROWs granted; recreation, including camping, hiking, and OHV use; special land use designations; livestock grazing; and vegetation and forest management Again, the BLM admits that it will continue allowing actions that it admits violate the BLMs duty to protect and restore	DECI07-Compliance with other laws and policies	Impacts from management actions including livestock grazing, recreation, and vegetation management on soil resources are discussed in Chapter 3, Soil and Biological Crusts, Environmental Consequences. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects.
14767-204	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Surface-disturbing activities include digging, trenching, and other activities that disturb soil resources past the natural erosive process. See the Glossary for the full definition of surface disturbance. Decreased vegetation cover and soil compaction can reduce water infiltration, leading to an increase in surface water runoff, soil erosion, and sedimentation of adjacent waterways. Surface-disturbing activities can change the physical characteristics of streams and other surface waterbodies through direct disturbance of stream channels or by increasing runoff from the surrounding watershed. These changes contribute to streambank erosion, increased turbidity, and degradation of water quality, potentially leading to new surface water impairments or inhibiting resolution of existing impairments. All these factors are directly caused by permitted livestock grazing, obviously degrading objects, yet the BLM failed to examine these impacts in light of its protect and restore mandate.	DECI07-Compliance with other laws and policies	The agencies considered the commentor's suggestions, see changes to the Glossary.
14767-205	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Construction of range-improvement features, such as water developments, can result in localized surface disturbance as a result of the digging and earthmoving required to remove vegetation and construct features. Livestock grazing near waterways can cause water quality impacts, such as stream bacteria loading from animal manure, including Cryptosporidium parvum, Shigella sp., and virulent strains of E. coli (Hudson 2021), which can be a health concern because some water sources are used for drinking water in backcountry sites. Livestock grazing near waterbodies can cause increases in nutrient levels that affect aquatic habitats and water quality conditions and may interfere with meeting state water quality standards. Intensive livestock grazing is also associated with ecological degradation of springs by groundwater extraction and overuse (SSI 2022). Livestock grazing can result in increased stream temperatures when grazing occurs in the riparian zone because these areas provide important shade for streams. It can also contribute to the degradation of streambank stability and can increase sediment loading, TDS, and total suspended solids in streams.	DECI07-Compliance with other laws and policies	Impacts to water resources from livestock grazing are discussed in Chapter 3 Livestock Grazing. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			Limiting areas to only trailing has fewer impacts to water resources because time and duration of livestock use is more restricted. Livestock grazing could also impact soil erosion, streambank degradation, and sedimentation. Yet the BLM, despite these admissions, fails to even consider whether these impacts comply with the protect and restore mandate.		
14767-212	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.7, the BLM admits: Implementing the RMP/EIS management actions would result in surface-disturbing activities, including permitted recreation activities, livestock grazing authorizations, and ROW development, which result in a commitment to the loss of irreversible or irretrievable resources Soil erosion or the loss of productivity and soil structure might also be considered irreversible commitments of resources. Surface-disturbing activities would remove vegetation and accelerate erosion that would contribute to irreversible soil loss; The BLM admits it has no intention of complying with FLPMA 302 (a), The Omnibus Public Lands Management Act of 2009, the applicable Secretarial Order and the entire NLCS set of directives. Its admitting it is prioritizing resource extraction over its clear legal duties. This is the essence of arbitrary and capricious decision-making, disallowed by the APA.	DECI07-Compliance with other laws and policies	For the management actions in the Proposed Plan see Chapter 2.
14767-218	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	AMS 5.8 This section assumes that the responsibility for cultural resources end with the procedural requirements of the NHPA, which simply mandates analysis not protection. The Omnibus Public Lands Act, and related requirements mandate protection and elimination of impacts. This mandate is not reflected in the AMS, the EIS or the RMP. By definition all impacts to cultural resources are both cumulative and permanent.	DECI07-Compliance with other laws and policies	Thank you for your comment. See the Proposed Plan under the Cultural Resources section for management actions to protect cultural resources.
14767-222	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	AMS 6.4 The language for Standards for Rangeland Health and Guidelines for Grazing Management for BLM Lands in Utah differs between agencies, but both focus on moving the land toward desired conditions though vegetation management and range improvements (BLM 1997; USDA Forest Service 1990). It is all also based upon the analysis of rangeland conditions through monitoring, analysis of data, and the history of allotments. Each agency uses a set of standards and guidelines to ensure that range health is met and measures are taken. What? There are no Standards of Rangeland Health for the Forest Service. The problem with this statement in addition to be factually incorrect, it that any desired conditions are based off the FS and BLM multiple use framework which does not apply to NLCS lands. The desired conditions must be defined based on the Proclamation mandate to protect and restore objects. Simply shoehorning multiple use desired conditions onto an NLCS unit does not protect the resources which the Monument was designated to protect.	DECI07-Compliance with other laws and policies	Text was revised to accurately reflect rangeland health for the USDA Forest Service. The Proclamation 10285 outlines the Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan includes prioritizing 6 allotments for the completion of rangeland health assessment within 3 years of the signing of the ROD.
14767-223	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	DO 11B also provides important and applicable requirements that the NPS must comply with.	DECI07-Compliance with other laws and policies	Management of BENM is under the jurisdiction of the USDA Forest Service and BLM; however, as a cooperating agency, the National Park Service was provided opportunities to review the issues raised during scoping, alternatives, and analysis.
14767-224	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The DRMP is worse than the trump-era RMP6, it is worse than the bush II multiple use RMP. ES-1 The entire landscape reserved by the Proclamation is an object of historic and scientific interest in need of protection and that in the absence of a reservation under the Antiquities Act, the objects identified within the boundary of BENM are not adequately protected. The DRMP provides less protections than even the bush II era multiple use RMP which the President found to be not adequately protective. The DRMP provides less protections than even the trump era RMP which the President found to be not adequately protective.	DECI07-Compliance with other laws and policies	The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.
14767-225	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The BLM appears to misunderstand what the NHPA is. It is not a protection law, its merely an analysis law, like NEPA. The NHPA does not mandate protection of archi resources, it merely demands an examination of them. Yet the BLM in the EIS and DRMP try to fool the public and the tribes that simply doing its Section 106 duties protects archi resources. It does not. Further, Section 106 would only be triggered if the BLM did NEPA, which it does not. And the DRMPs promise to create a priority list does not to dispel this problem. Writing a prioritization on a piece of paper does nothing on the ground.	DECI07-Compliance with other laws and policies	The Proposed Plan in the Chapter 2 Cultural Resource Section includes management actions to protect cultural resources. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals.
14767-23	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The first and foremost consideration must be the legal and regulatory framework within which the BLM operates. The overarching law is FLPMA. FLPMA requires that the BLM: Section 102 (2) the national interest will be best realized if the public lands and their resources are periodically and systematically inventoried and their present and future use is projected through a land use planning process coordinated with other Federal and State planning efforts Section 102 (8) the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will pro-vide for outdoor recreation and human occupancy and use Section 201 (a) The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. This inventory shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values. The preparation and maintenance of such inventory or the identification of such areas shall not, of itself, change or prevent change of the	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			management or use of public lands.(emphasis added) Compliance with this subsection is the prerequisite of all planning and must be completed prior to the RMP development process. Note also that the next Section B mentions funding. This indicates Section B is discretionary, whereas Section A is mandatory. Section 202 (c) In the development and revision of land use plans, the Secretary shall (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law; (2) use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences; (3) give priority to the designation and protection of areas of critical environmental concern; (4) rely, to the extent it is available, on the inventory of the public lands, their resources, and other values; (5) consider present and potential uses of the public lands; (6) consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for realization of those values; (7) weigh long-term benefits to the public against short-term benefits; (8) provide for compliance with applicable pollution control laws, including State and Federal air, water, noise, or other pollution standards or implementation plans; (emphasis added) Section 302 B In managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands. The regulations implementing the FLPMA planning requirements are at 43 CFR 1600. 43 CFR 1601.0-2 Objective. The objective of resource management planning by the Bureau of Land Management is to maximize resource values for the public through a rational, consistently applied set of regulations and procedures which promote the concept of multiple use management and ensure participation by the public, state and local governments, Indian tribes and appropriate Federal agencies. Resource management plans are designed to guide and control future management actions and the development of subsequent, more detailed and limited scope plans for resources and uses. (emphasis added) It is clear from the above that the RMP is required to provide specific requirements, standards and limitations that are overarching for the Monument and that guide the site-specific decisions later. The usual RMPs written over the last decade are little more than aspirational wishes with no requirements. The DRPM is similar providing generalities, but lacking specifics. This violates FLPMA. This issue is made even more clear under Definition N, which states: (n) Resource management plan means a land use plan as described by the Federal Land Policy and Management Act. The resource management plan generally establishes in a written document: (1) Land areas for limited, restricted or exclusive use; designation, including ACEC designation; and transfer from Bureau of Land Management Administration; (2) Allowable resource uses (either singly or in combination) and related levels of production or use to be maintained; (3) Resource condition goals and objectives to be attained; (4) Program constraints and general management practices needed to achieve the above items; (5) Need for an area to be covered by more detailed and specific plans; (6) Support action, including such measures as resource protection, access development, realty action, cadastral survey, etc., as necessary to achieve the above; (7) General implementation sequences, where carrying out a planned action is dependent upon prior accomplishment of another planned action; and (8) Intervals and standards for monitoring and evaluating the plan to determine the effectiveness of the plan and the need for amendment or revision. The EIS and alternatives failed to provide a rational basis for its determinations as to what lands will be grazed. They must provide for 3, other than general, unmeasurable statements. The DRMP failed to provide for 4, 6 or 8.		
14767-25	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	43 CFR 1610.4-4 requires that the BLM: The Field Manager, in collaboration with any cooperating agencies, will analyze the inventory data and other information available to determine the ability of the resource area to respond to identified issues and opportunities. The analysis of the management situation shall provide, consistent with multiple use principles, the basis for formulating reasonable alternatives, including the types of resources for development or protection. Factors to be considered may include, but are not limited to: (a) The types of resource use and protection authorized by the Federal Land Policy and Management Act and other relevant legislation; (b) Opportunities to meet goals and objectives defined in national and State Director guidance; (c) Resource demand forecasts and analyses relevant to the resource area; (d) The estimated sustained levels of the various goods, services and uses that may be attained under existing biological and physical conditions and under differing management practices and degrees of management intensity which are economically viable under benefit cost or cost effectiveness standards prescribed in national or State Director guidance; (e) Specific requirements and constraints to achieve consistency with policies, plans and programs of other Federal agencies, State and local government agencies and Indian tribes; (f) Opportunities to resolve public issues and management concerns; (g) Degree of local dependence on resources from public lands; (h) The extent of coal lands which may be further considered under provisions of 3420.23(a) of this title; and (i) Critical threshold levels which should be considered in the formulation of planned alternatives. BLM Manual 1601 Land Use Planning further describes the requirements the BLM must comply with in the development of an RMP: Section .1 B. The land use planning process is the key tool used by the BLM, in coordination with interested publics, to protect resources and designate uses on Federal lands managed by the BLM. Planning is critical to ensuring a coordinated, consistent approach to managing these lands. This Manual and Handbook provide guidance for preparing new Resource Management Plans (RMPs), plan revisions, plan amendments, other equivalent plans (e.g., plans adopted from other agencies), and subsequent implementation-level plans. Procedures and requirements are set forth to ensure that the BLMs plans meet regulatory and	DECI07-Compliance with other laws and policies	See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS and for which the EIS is compliant. The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			statutory requirements. (emphasis added) Section .2 .02 Objectives. These plans help ensure that the public lands are managed in accordance with FLPMA (43 USC 1701 et seq.) and other applicable laws and regulations, under the principles of multiple use and sustained yield; in a manner that recognizes the Nations need for domestic sources of minerals, food, timber, and fiber; and in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water, and archaeological values. Where appropriate, lands will be managed to preserve and protect certain public lands in their natural condition to provide food and habitat for fish and wildlife and domestic animals, and to provide for outdoor recreation and human occupancy and use. The BLM will encourage collaboration and public participation throughout the planning process. To accomplish the above, the BLM will: A. Provide on a continuing basis an inventory of all public lands and their resource and other values. This inventory shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values (FLPMA, Sec. 201 (a)). B. Use an interdisciplinary process for evaluating resource information that considers physical, cultural, and biological resources in conjunction with social and economic factors to decide appropriate public land uses. C. Ensure opportunities for participation by Indian tribes, State and local governments, other Federal agencies, and the public in a way that coordinates land use inventory, planning, and management activities with these other jurisdictional entities. Such participation will help ensure that land use plans for public lands are consistent with the plans and policies of these entities to the maximum extent consistent with Federal law (FLPMA, Sec. 202 (c) (9)), and that policies of approved Indian tribal land resource management programs are considered (FLPMA, Sec. 202 (b)). D. Use collaborative and multijurisdictional approaches, to the extent possible, to encourage consistency in planning across different land ownerships and jurisdictions. E. Provide to the public a documented record of land allocations and permissible resource uses and constraints. F. Provide a framework to guide subsequent implementation decisions. (emphasis added) The DRMP fails to comply with these requirements.		
14767-26	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section .3 2. reiterates the requirements of FLPMA: Sec. 201 requires the Secretary of the Interior to prepare and maintain an inventory of the public lands and their resource and other values, giving priority to areas of critical environmental concern (ACECs), and, as funding and workforce are available, to determine the boundaries of the public lands, provide signs and maps to the public, and provide inventory data to State and local governments. F. The Colorado River Basin Salinity Control Act, 43 U.S.C. 1593, requires a comprehensive program for minimizing salt contributions to the Colorado River from BLM lands. Livestock grazing significantly increases salinity in runoff but the DRMP fails to provide compliance with the above.	DECI07-Compliance with other laws and policies	As noted in Chapter 2 in the Soil Resources section under the Proposed Plan, agencies would manage public lands consistent with the Colorado River Salinity Control act. Livestock grazing is required to meet rangeland health standards which includes water resources as an indicator.
14767-27	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section .06 requires: 2. The BLMs mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. Land use plan decisions will further this mission by identifying desired outcomes and actions that restore and maintain the health of the land; preserve natural and cultural heritage; reduce threats to public health, safety, and property; and provide opportunities for environmentally responsible recreational and commercial activities. 3. When making land use plan decisions, the BLM will consider information from all available sources, including scientific data gained from resource assessments, information regarding ecosystem protection and restoration needs, the reasonably foreseeable development of consumptive and nonconsumptive uses, and social and economic information. The DRMP fails to comply with this requirement.	DECI07-Compliance with other laws and policies	The alternatives analyzed in the RMPs/EIS include a range of management actions that provide for the proper care and management of the Monument objects identified in Presidential Proclamation 10285. Presidential Proclamation 10285 makes it clear that the BLM and USDA Forest Service have discretion in determining the appropriate management for lands within BENM to provide for the proper care and management of Monument objects. The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.
14767-28	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The Manual provides specific definitions for the requirements that an RMP must contain: Goal: a broad statement of a desired outcome. Goals are usually not quantifiable and may not have established time frames for achievement. Guidelines: actions or management practices that may be used to achieve desired outcomes, sometimes expressed as best management practices. Guidelines may be identified during the land use planning process, but they are not considered a land use plan decision unless the plan specifies that they are mandatory. Guidelines for grazing administration must conform to 43 CFR 4180.2. Land Use Allocation: the identification in a land use plan of the activities and foreseeable development that are allowed, restricted, or excluded for all or part of the planning area, based on desired future conditions. Land Use Plan Decision: establishes desired outcomes and actions needed to achieve them. Decisions are reached using the planning process in 43 CFR 1600. When they are presented to the public as proposed decisions, they can be protested to the BLM Director. They are not appealable to IBLA. Objective: a description of a desired condition for a resource. Objectives can be quantified and measured and, where possible, have established time frames for achievement. Planning Criteria: the standards, rules, and other factors developed by managers and interdisciplinary teams for their use in forming judgments about decision making, analysis, and data collection during planning. Planning criteria streamline and simplify the resource management planning actions. Resource Use Level: the level of use allowed within an area. It is based on the desired outcomes and land use allocations in the land use plan. Targets or goals for resource use levels are established on an area-wide or broad watershed level in the land use plan. Site-specific resource use levels are normally determined at the implementation level, based on site-specific resource conditions and needs as determined through resource monitoring and assessments. Standard: a description of the physical and biological conditions or degree of function required for	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			healthy, sustainable lands (e.g., land health standards). The DRMP fails to comply with these requirements.		
14767-29	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	BLM H-1601-1 Land Use Planning Handbook, likewise provides further specificity and reiteration of the requirements the BLM must follow in the development of RMPs: Land use plans and planning decisions are the basis for every on-the-ground action the BLM undertakes. Land use plans ensure that the public lands are managed in accordance with the intent of Congress as stated in FLPMA (43 U.S.C. 1701 et seq.), under the principles of multiple use and sustained yield. As required by FLPMA and BLM policy, the public lands must be managed in a manner that protects the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; that will provide for outdoor recreation and human occupancy and use; Land use plans are one of the primary mechanisms for guiding BLM activities to achieve the mission and goals outlined in the Department of the Interior (DOI) Strategic Plan. Handbook at 1A Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. These land use plan decisions establish goals and objectives for resource management (desired outcomes) and the measures needed to achieve these goals and objectives (management actions and allowable uses). Section 202(c) of FLPMA (43 U.S.C. 1712) requires that in developing land use plans, the BLM: 1. Use and observe the principles of multiple use and sustained yield; 2. use a systematic interdisciplinary approach to integrate physical, biological, economic, and other sciences; 3. give priority to designating and protecting areas of critical environmental concern (ACECs); 4. rely, to the extent available, on an inventory of public lands, their resources, and other values; 5. consider present and potential uses of public lands; 6. consider the relative scarcity of the values involved and the availability of alternative means and sites for realizing those values; 7. weigh long-term benefits to the public against short-term benefits; 8. provide for compliance with applicable Tribal, Federal, and state pollution control laws, standards, and implementation plans; and 9. to the extent consistent with the laws governing the administration of public lands, coordinate the land use inventory, planning, and management activities of public lands with land use planning and management programs of other Federal departments/agencies and state/local governments, as well as the policies of approved Tribal and state land resource management programs. The BLM must, to the extent practical, assure that consideration is given to those Tribal, state, and local plans that are germane in the development of land use plans for public lands. Land use plans must be consistent with state and local plans to the maximum extent consistent with Federal law. Refer to FLPMA for the full text of Federal responsibilities detailed under Section 202(c)(9). Handbook at IIA The DRMP fails to comply with these requirements.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC. This document and associated appendices is compliant with NEPA. Public input on any errors is considered during the comment period between the Draft EIS and Final EIS. Any errors in data will be updated at that time
14767-30	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Further defining the required components of an RMP, the Handbook states in Section II B: B. Types of Land Use Plan Decisions Land use plan decisions for public lands fall into two categories: desired outcomes (goals and objectives) and allowable (including restricted or prohibited) uses and actions anticipated to achieve desired outcomes. 1. Desired outcomes Land use plans must identify desired outcomes expressed in terms of specific goals and objectives. Goals and objectives direct the BLMs actions in most effectively meeting legal mandates; numerous regulatory responsibilities; national policy, including the DOI Strategic Plan goals; State Director guidance (see 43 CFR 1610.0-4(b)); and other resource or social needs. Desired outcomes should be identified for and pertain to resources (such as natural, biological, and cultural), resource uses, (such as energy and livestock grazing), and other factors (such as social and economic conditions). Definitions and examples of goals and objectives are listed below: Goals are broad statements of desired outcomes (e.g., maintain ecosystem health and productivity, promote community stability, ensure sustainable development) that usually are not quantifiable. Since the release of the original Handbook, the BLM has worked with RACs to develop Land Health Standards applicable to all ecosystems and management actions. These Land Health Standards must be expressed as goals in the land use plan. Goals can also be drawn from the Departmental and/or the DOI Strategic Plan or other sources. A sample goal for a Land Health Standard is: Maintain healthy, productive plant and animal communities of native and other desirable species at viable population levels commensurate with the species and habitats potential. A sample goal from the Strategic Plan is: Sustain desired biological communities on Department of the Interior-managed and -influenced lands and waters in a manner consistent with obligations regarding the allocation and use of water. These goals, or modifications thereof, could be used in a land use plan. Objectives identify specific desired outcomes for resources. Objectives are usually quantifiable and measurable and may have established timeframes for achievement (as appropriate). A sample objective is: Manage vegetative communities on the upland portion of the Clear Creek Watershed to achieve, by 2020, an average 30 to 40 percent canopy cover of sagebrush to sustain sagebrush-obligate species. When quantified, the indicators associated with Land Health Standards are one possible source of objectives. While the BLM has been writing goals in recent RMPs, the objectives have been noticeably missing. The DRMP fails to provide objectives as laid out in the manual.	DECI07-Compliance with other laws and policies	The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-31	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	2. Allowable uses and management actions anticipated to achieve desired outcomes (goals and objectives) After establishing desired outcomes, the BLM identifies allowable uses (land use allocations) and management actions for different alternatives that are anticipated to achieve the goals and objectives. a. Allowable uses. Land use plans must identify uses, or allocations, that are allowable, restricted, or prohibited on the public lands and mineral estate. These allocations identify surface lands and/or subsurface mineral interests where uses are allowed, including any restrictions that may be needed to meet goals and objectives. Land use plans also identify lands where specific uses are excluded to protect resource values. Certain lands may be open or closed to specific uses based on legislative, regulatory, or policy requirements or criteria to protect sensitive resource values. If land use plan decisions close areas of 100,000 acres or greater in size to a principal or major use for 2 years or more, Congress must be notified of the closure upon its implementation as prescribed in 43 CFR 1610.6. The land use plan must set the stage for identifying site-specific resource use levels. Site-specific use levels are normally identified during subsequent implementation planning or the permit authorization process. At the land use plan level, it is important to identify reasonable development scenarios for allowable uses such as mineral leasing, locatable mineral development, recreation, timber harvest, utility corridors, and livestock grazing to enable the orderly implementation of future actions. These scenarios provide a context for the land use plans decisions and an analytical base for the NEPA analysis. The BLM may also establish criteria in the land use plan to guide the identification of site-specific use levels for activities during plan implementation. b. Management actions. Land use plans must identify the actions anticipated to achieve desired outcomes, including actions to maintain, restore, or improve land health. These actions include proactive measures (e.g., measures that will be taken to enhance watershed function and condition), as well as measures or criteria that will be applied to guide day-to-day activities occurring on public land. Land use plans also establish administrative designations such as ACECs, recommend proposed withdrawals, land tenure zones, and recommend or make findings of suitability for congressional designations (such as components of the National Wild and Scenic River System). While protection and restoration opportunities and priorities are often related to managing specific land uses (such as commodity extraction, recreation, or rights-of-way corridors), they can be independent of these types of uses as well. In certain instances, it is insufficient to simply remove or limit a certain use, because unsatisfactory resource conditions may have developed over long periods of time that will not correct themselves without management intervention. For example, where exotic invasive species are extensive, active restoration may be necessary to allow native plants to reestablish and prosper. In these cases, identifying restoration opportunities and setting restoration priorities are critical parts of the land use planning process. The DRMP fails to comply with these requirements.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.
14767-32	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Appendix C of the Handbook states: The application of program-specific guidance for land use plan decisions will vary, depending on the decision category, and must be applied as follows: I. Natural, Biological, and Cultural Resources: Decisions identified must be made during the land use planning process if the resource exists in the planning area. II. Resource Uses: Decisions identified must be made during the land use planning process if the BLM anticipates it may authorize or allow a resource use. If uses are allowed, decisions must also be made regarding intensity and limits or restrictions. III. Special Designations: Special designation decisions identified must be made during the land use planning process when the BLM anticipates it may authorize or allow uses which could disqualify inventoried resource values from designation. Special designation decisions may be made during the land use planning process when there is no threat to the inventoried resource. IV. Support: Support needs and decisions may be determined through the land use planning process, based on individual planning situations. Clearly, the BLM intends to continue authorizing livestock grazing, yet the DRMP fails to provide that decisions must also be made regarding intensity and limits or restrictions.	DECI07-Compliance with other laws and policies	The Livestock Grazing sections in Chapter 2 and Chapter 3 discuss limits and restrictions to livestock grazing throughout BENM. The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.
14767-35	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The Department of the Interior Departmental Manual 520 DM1 provides important guidance for the development of RMP. We provide a highlighted version of this in full. We, again, particularly draw your attention to the Policy statement, Section 1.7 C 4, 5 and 10 as well as 1.8.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.
14767-36	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We also, again, provide as highlighted version of BLM Manual 1737 Riparian-Wetland Area Management as Exhibit C. Of critical importance are: .06 Department of the Interior and BLM Policy (p9) .11C 1 through 6 (p12) which define RMP minimum requirements .41A (p19) grazing related RMP requirements for the protection of riparian areas .41B (20) Wetland management requirements for RMPs .42A 1, 2 and 3 RMP requirements for soil and water .45A and D - RMP requirements for fish and wildlife habitat Page 30 Salinity Control Act requirements All this direction was ignored in the EIS and DRPM.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.
14767-37	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We also provide a highlighted version of BLM Manual 6720 Aquatic Resource Management. Of critical importance are: .04J Manager responsibilities .06 BLM Policy .11 and .12 Inventory requirements .13B (p9) RMP requirements .16 (p11) RMP requirements All this direction was ignored in the EIS and DRPM.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-38	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We also provided as highlighted version of BLM Manual 7200 Water Resource Management. Of critical importance are: Objectives (p3) .06C RMP requirements .21 Planning and RMP requirements Each of the above is clearly relevant to the RMP development process. All this direction was ignored in the EIS and DRPM.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan provides protection of BENM objects through a suite of many management actions and through collaboration with the BEC.
14767-46	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In a review of drought effects and management, a Prescott National Forest biologist has shown the need for de-stocking and rest to maintain plant communities during dry and drought conditions and the irreversible loss of soil that can occur3,4. Without specification of grazing regimes to allow for below normal and drought conditions, sensitive species of native grass such as Idaho fescue, bluebunch wheatgrass and others can lose vigor, productivity and be lost over time unless proper stocking and rest are employed to maintain these plants. Failure to do so is in violation of the impairment provision of FLPMA.	DECI07-Compliance with other laws and policies	The Proclamation states that grazing is an authorized use and alternatives presented in the draft RMP/EIS consider multiple ways to manage grazing under existing permits. See table titled Alternatives for Livestock Grazing. Specific management activities which involve grazing will be addressed in implementation level planning.
14767-50	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	BLM RMP Planning Handbook Appendix C requires that lands available or not available for livestock grazing be determined by considering: 1) other uses for the land; 2) terrain characteristics; 3) soil, 4) vegetation 5) watershed characteristics 6) the presence of undesirable vegetation, including significant invasive weed infestations 7) the presence of other resources that may require special management or protection, such as special status species, special recreation management areas (SRMAs), or ACECs. The EIS and DRMP completely failed to comply with this direction.	DECI07-Compliance with other laws and policies	The Proclamation states that grazing is an authorized use and alternatives presented in the draft RMP/EIS consider multiple ways to manage grazing under existing permits. See table titled Alternatives for Livestock Grazing. Specific management activities which involve grazing will be addressed in implementation level planning.
14767-52	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Beyond the FLPMA planning requirements discussed above, the BLM must comply with the direction specific to NLCS units. For instance, Secretarial Order 3308: Sec. 4 Policy. a. The BLM shall ensure that the components of the NLCS are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values. If consistent with such protection, appropriate multiple uses may be allowed, consistent with the applicable law and the relevant designations under which the components were established. Again, the BLM has put the cart before the horse. The EIS and DRPM are not based on any assessment or implementation of the above policy.	DECI07-Compliance with other laws and policies	The Proposed Plan and environmental impact statement follow all applicable laws and policies.
14767-55	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	4. The BLM will inventory and monitor the values for which NLCS units were designated. Monitoring data will be collected and stored in accordance with BLM data standards. The BLM must implement this requirement. The result being is that the BLM is undertaking this planning process blind. It has little to no data on most of the objects that the proclamation requires the BLM to protect. The EIS fails to even enumerate what the objects are, instead it simply proffers broad, cursory and unsupported assertions that all objects (whatever they are) are miraculously protected and restored. Without data regarding the condition of these resources and impacts from livestock to these resources, the BLM can not provide the management requirements and limitations necessary to protect these resources.	DECI07-Compliance with other laws and policies	Presidential Proclamation 10285 discusses resources located with BENM, with which many, but not all, constitute objects of historic and scientific interest. The agencies are preparing the RMP/EIS consistent with the protection of those resources, including the objects of historic and scientific interest. The Proposed Plan includes monitoring for a variety of resources within BENM to ensure management actions are moving resource conditions towards goals and objectives as well as to adapt management actions in collaboration with the BEC to move resource conditions towards goals and objectives.
14767-57	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	B. Primacy of Presidential or Congressional Designations 1. Section 302(a) of the Federal Land Policy and Management Act (FLPMA) states that public lands are to be managed under the principles of multiple use and sustained yield except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it will be managed in accordance with such law. Therefore, as a general rule, if the Act of Congress or presidential proclamation that designates an NLCS unit conflicts with FLPMA's multiple use mandate, the designating language will apply. Land use planning decisions for each NLCS unit must be consistent with the purposes and objectives of the designating proclamation or Act of Congress. Again, the BLM has failed to implement this requirement as the foundation of all alternatives.	DECI07-Compliance with other laws and policies	The Proposed Plan complies with all applicable laws and policies and Presidential Proclamation 10285, the designating proclamation for BENM.
14767-58	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In Section C: 2. Land use plans addressing NLCS units will identify the values for which the area was designated. Plans addressing NLCS units, including implementation plans, will emphasize the conservation, protection, and restoration of these values. 3. The BLM will develop monitoring strategies to track the implementation and effectiveness of plan decisions addressing NLCS units. The EIS and DRMP fail to even enumerate what all the objects are, so how could specific requirements and limitations be designed to protect and restore those objects? Take for example, the issue of BSC protection. There is nothing within the DRMP that protects BSC. What about BSC recovery from the current severely degraded conditions? Nothing. How can that be, rationally, considered as the BLM emphasizing conservation, protection, and restoration? Again, the EIS, alternatives and DRMP failed to implement these requirements.	DECI07-Compliance with other laws and policies	Presidential Proclamation 10285 discusses resources located with BENM, with which many, but not all, constitute objects of historic and scientific interest. The agencies are preparing the RMP/EIS consistent with the protection of those resources, including the objects of historic and scientific interest. Revised language in Appendix N; Chapter 3, Soils and Biological Crusts; Chapter 2, Livestock Grazing; and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
14767-60	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section I requires: 3. The BLM will only develop new facilities, including roads, within NLCS units where they are required under law, required for public health and safety, are necessary for the exercise of valid existing rights or other non-discretionary uses, prevent impacts to fragile resources, or further the purposes for which an area was designated. The alternatives and DRMP fails to comply with this requirement.	DECI07-Compliance with other laws and policies	Proclamation 9558, incorporated by reference into Proclamation 10285 states that designation of new routes must be limited to roads and trails necessary for public safety or protection of BENM objects. Chapter 2 Travel Management describes the designation of new roads or trails for public motorized vehicle use must be limited to routes necessary for public safety or protection of BENM objects.
14767-61	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	K. Livestock Grazing1. To the extent consistent with the designating legislation or proclamation and other applicable law, livestock grazing may occur within NLCS units. 2. Grazing management practices will be implemented in a manner that protects the values for which NLCS units were designated unless otherwise provided for in law. 3. The BLM will use NLCS units as a laboratory for	DECI07-Compliance with other laws and policies	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			innovative grazing techniques designed to better conserve, protect, and restore NLCS values, to the extent consistent with the designating legislation or proclamation and other applicable law. Again, the alternatives and DRMP fails to implement these requirements.		utilization levels for livestock when utilization thresholds are reached. As outlined in Chapter 2 Livestock Grazing, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
14767-62	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Manual 6220 provides further requirements: 1.2 Objectives. The BLMs objectives in implementing this policy are to: A. Comply with designating Acts of Congress and presidential proclamations by conserving, protecting, and restoring the objects and values for which Monuments and NCAs were designated for the benefit of present and future generations. B. Effectively manage valid existing rights and compatible uses within Monuments and NCAs. C. Manage discretionary uses within Monuments and NCAs to ensure the protection of the objects and values for which the Monuments and NCAs were designated. D. Utilize science, local knowledge, partnerships, and volunteers to effectively manage Monuments and NCAs. The BLM failed to implement this direction in the EIS, provided alternatives and DRMP.	DECI07-Compliance with other laws and policies	Manual 6220 was considered in the development of this draft RMP/EIS. See Appendix B for a list of laws, regulations, policies, and plans considered by the agencies.
14767-63	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	C. Compatibility of Uses. 1. Site-specific activities in Monuments and NCAs will be managed in a manner that is compatible with the protection of the objects and values for which these areas were designated. Multiple uses may be allowed to the extent they are consistent with the applicable designating authority, other applicable laws, and with the applicable land use plan. 2. Through the NEPA process, the manager with decision-making authority for a Monument or NCA will evaluate discretionary uses and will analyze whether the impacts of the proposed use in the Monument or NCA or similarly designated area are consistent with the protection of the areas objects and values. As part of this analysis, the manager will consider the severity, duration, timing, and direct and indirect and cumulative effects of the proposed use. If necessary and appropriate, the BLM may use the land use planning process to consider whether to change discretionary use authorizations. 3. When approving a proposed action, the decision must document how the activity is consistent with the proclamation or designating legislation. The BLM failed implement this direction in the EIS, provided alternatives and DRMP.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all applicable laws and policies and the Proclamation. Site-specific management actions and decisions will be analyzed for impacts at the time of the proposed actions, with opportunities for public involvement. Documentation of consistency for those step-down actions to the Proclamation and to this RMP will be provided and undertaken at the time of the proposed actions and site-specific management analysis.
14767-64	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	F. Facilities. 1. The BLM will inventory existing facilities within Monuments and NCAs and determine whether to remove, maintain, restore, enhance, or allow natural disintegration of each facility. Subject to applicable law and valid existing rights, the BLM will consider removal of facilities on Monuments or NCAs that do not have administrative, public safety, recreational, cultural, or historic value. The BLM failed to implement this direction.	DECI07-Compliance with other laws and policies	Further details about facilities and infrastructure will be included in an implementation level analysis.
14767-65	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	3. The BLM will only develop new facilities, including structures and roads, within Monuments and NCAs where they are necessary for public health and safety, are required under law, are necessary for the exercise of valid existing rights or other non-discretionary uses, prevent impacts to fragile resources, or further the purposes for which an area was designated. Livestock grazing does not fit under any of the categories provided for the construction of new facilities. The EIS, alternatives and DRMP fail to implement this requirement.	DECI07-Compliance with other laws and policies	Proclamation 10285 states: "the Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." Alternatives consider multiple ways to manage grazing under existing permits. The plan provides direction towards implementation of grazing permit renewals and allotment management plans. Grazing management in all alternatives is designed to protect resources, including objects of the Monument.
14767-66	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section G requires: 4. Land use plans must analyze and consider measures to ensure that objects and values are conserved, protected, and restored. Specifically, plans must: a. clearly identify Monument and NCA objects and values as described in the designating proclamation or legislation; where objects and values are described in the designating legislation or proclamation only in broad categories (e.g. scenic, ecological, etc.), identify the specific resources within the designating area that fall into those categories; b. identify specific and measurable goals and objectives for each object and value, as well as generally for the Monument or NCA; c. identify management actions, allowable uses, restrictions, management actions regarding any valid existing rights, and mitigation measures to ensure that the objects and values are protected; (emphasis added) g. include a monitoring strategy that identifies indicators of change, methodologies, protocols, and time frames for determining whether desired outcomes are being achieved; and h. be evaluated at least every five years, consistent with and as required by BLM land use planning guidance. Again, the BLM failed to even enumerate each of the objects and values are, much less implement specific and measurable goals and objectives for each. The BLM failed to implement these requirements within the proposed alternatives and DRMP.	DECI07-Compliance with other laws and policies	The agencies complied with all applicable Federal Law and regulation in developing the RMP/EIS. Presidential Proclamation 10285 discusses resources located with BENM, with which many, but not all, constitute objects of historic and scientific interest. The agencies are preparing the RMP/EIS consistent with the protection of those resources, including the objects of historic and scientific interest.
14767-70	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The Monticello Field Office, within the BENM is tasked with the administration of grazing leases within the Glen Canyon National Recreation Area (GCNRA) under Public Law 92-593. This administration of grazing leases by the BLM is subject to the provisions of 3(a) and 4 of the Act which established the GCNRA. These provisions require National Park lands to be administered under National Park Service Organic Act, The Act of August 25th, 1916, the Redwoods Act of 1968, NPS regulations and NPS Policy 2006. Grazing within the GCNRA is currently managed under the General Management Plan, the Grazing Management Plan (GMP) and the Interagency Agreement. Unfortunately, the BLM has ignored these management requirements in its administration of National Park Service lands since	DECI07-Compliance with other laws and policies	The Glen Canyon National Recreation Area is not within the boundaries of Bears Ears National Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			the establishment of GCNRA. The GMP is equivalent to an RMP yet the BLM has not implemented the GMP in its management decisions on NPS lands nor are most permits in compliance with the GMP.		
14767-71	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In addition, the GMP lists a wide range of requirements such as utilization limits, resource objectives and other direction, none of which have been implemented on NPS lands. It is as if the BLM operates as if there were no difference whatsoever in the management of NPS and BLM lands. It appears from my review of extensive documents received under FOIA that the BLM considers itself in charge of grazing on the GCNRA and often fails to even notify the NPS of activities it conducts NPS lands. Both the enabling legislation as well as the MOU and Agreement clearly indicate that BLM administration of grazing leases is subject to the legislation and regulations discussed above not the other way around. The GMP has a wide range of requirements that must be implemented into permit administration and general grazing management for all grazing that takes place on the GCNRA. It appears from my review of FOIA documents that with extremely rare exceptions, the BLM ignores these requirements in its administration of grazing on the GCNRA. This process so far, as well as all the previous processes have utterly ignored basic facts and requirements in its attempts to force BLM management onto NPS lands. So we again have to educate the BLM on these basic facts. All authorized activities and associated impacts are subordinate to the National Park Service Act of 1916 and predicated on a finding by the Secretary that they have no significant adverse effects on the scenic, scientific, and historic features or on the administration of the area. (GCNRA CRMP 1987 at 1) The relationship between the NPS and BLM regarding management of livestock grazing on NPS lands in GCNRA was clearly stated by a previous Superintendent to the BLM, quoted in the NPSs Review of Livestock Grazing on Glen Canyon National Recreation Area: There is no language in section 6, or in any other portion of the Act which makes it mandatory that grazing be permitted as is the case of Section 5 which governs hunting, fishing and trapping, or in any other sections which relate to specific permits, licenses, or studies. There is no question but that the Service is committed to permitting grazing in the recreation area, but subject to the entire language of Section 6. The point I am trying to make is that although BLM is directed to administer any grazing leases which are authorized by the Service, the jurisdiction over the lands involved, and consequently the determination as to the lands to be grazed is vested in the National Park Service. Somewhere in our discussion with BLM, this important distinction in authority is being disregarded or overlooked, and I believe it must be clearly recognized as a foundation upon which any meaningful cooperation between the two agencies must be based. (emphasis in the original) From my review of documents spanning from the creation of the Park unit to present, the relationship between the National Park Service and the BLM regarding livestock grazing management can only be described as toxic. The BLM has repeatedly and continually disregarded NPS requirements, the interagency agreement, the GMP and the Grazing Management Plan and the GCNRA has been too spineless to insist NPS regulations and requirements are complied with. The result of this dysfunctional relationship is that in the over 20 years since the NPS issued its Grazing Management Plan virtually none of it has been implemented. In fact, not a single permit issued by the BLM for NPS lands has terms and conditions implementing the Grazing Management Plan. The AMS and EIS continue the BLMs long tradition of ignoring requirements for the management and protection of National Park Service land.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-73	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The NPS is not governed by the principle of multiple use and is not constrained by the MUSYA. The NPS is governed by the Organic Act which requires the NPS to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations The GCNRA is also governed by the Redwoods Act of 1978 which requires that The authorization of activities. Shall not be exercised in derogation of the values and purposes for which these various areas have been established The Grazing Management Plan requires Before authorizing an activity, it must be determined if recreation area values and purposes are affected In its establishment, Congress directed that The administration of grazing leases within the recreation area shall be by the BLM. The same policies followed by the BLM in issuing and administering grazing leases on other lands under its jurisdiction shall be followed in regard to lands within the boundaries of the recreation area, subject to provisions of Section 3(a) and 4 of this Act What is clear is that the BLMs duty is limited to administering grazing leases and nothing else. Further, it is clear that the BLM is constrained by NPS law, regulation, policy and direction. The AMS and EIS and DRMP utterly and completely ignore this basic fact in its rush to impose BLM standards on NPS lands.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-74	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The NPS has not provided any information as to what management actions are needed for livestock grazing on NPS lands not to degrade the values and purposes for which the unit was established, yet the BLM, in its usual style, has already determined on the NPSs behalf how livestock grazing will continue and where. Again, the BLM has put the cart before the horse in its rush to maintain the status quo. Just as an example of the wide range of NPS requirements that the BLM has ignored, would be Directors Order 77-1. Has the NPS provided a review of the regulations and direction that all alternatives must comply with? If not how could you have developed alternatives that comply with those requirements? NPS Management Policy 2006 forms the foundation on which all activities on NPS lands must conform. The document states: This volume is the basic Service-wide policy document of the National Park Service. Adherence to policy is mandatory unless specifically waived	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			or modified by the Secretary, the Assistant Secretary, or the Director. The Policy document further states: Congress, recognizing that the enjoyment by future generations of the national parks can be ensured only if the superb quality of park resources and values is left unimpaired, has provided that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant. This is how courts have consistently interpreted the Organic Act. At 11 While commercial livestock grazing is, fortunately, rare in NPS units, the above clearly applies to other uses, including the livestock grazing under analysis here. In the Management Policies 2006 at 1.4.3.1, the NPS states: Park purposes are found in the general laws pertaining to the national park system, as well as the enabling legislation or proclamation establishing each unit. In addition to park purposes, in many cases the enabling legislation or proclamation for a park unit may also identify uses that are either mandated or authorized. In the administration of mandated uses, park managers must allow the use; however, they do have the authority to and must manage and regulate the use to ensure, to the extent possible, that impacts on park resources from that use are acceptable. In the administration of authorized uses, park managers have the discretionary authority to allow and manage the use, provided that the use will not cause impairment or unacceptable impacts. A plain reading of the legislative history clearly shows that livestock grazing on GCNRA is not a mandatory use but an authorized use which the NPS may allow or disallow, but you are only permitted to allow the use of livestock grazing provided that the use will not cause impairment or unacceptable impacts. In the Management Policies 2006 at 1.4.7, the NPS states: When an NPS decision-maker becomes aware that an ongoing activity might have led or might be leading to an impairment of park resources or values, he or she must investigate and determine if there is or will be an impairment. This investigation and determination may be made independent of, or as part of, a park planning process undertaken for other purposes. If it is determined that there is, or will be, an impairment, the decision-maker must take appropriate action, to the extent possible within the Services authorities and available resources, to eliminate the impairment. The action must eliminate the impairment as soon as reasonably possible, taking into consideration the nature, duration, magnitude, and other characteristics of the impacts on park resources and values, as well as the requirements of the National Environmental Policy Act, National Historic Preservation Act, the Administrative Procedure Act, and other applicable laws. (emphasis added) Again, the NPS policies require the NPS to investigate and determine if an activity might have lead or might be leading to an impairment yet this has not been done despite years and even decades of data coming in showing that impairment is occurring. Obvious areas where impairment is likely to be occurring would include: 1) Impacts to ESA listed species 2) Impacts to Biological Soil Crust (BSC) 3) Impacts to soils and soil erosion 4) Impacts to vegetation and wildlife 5) Impacts to water resources 6) Impacts to cultural resources 7) Impacts to visitor enjoyment		
14767-75	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We will discuss each of these issues in relation to current livestock impacts in a later section. Lets examine what the NPSs Management Policies 2006 has to say in regard to the management of biological resources: 4.4.1 General Principles for Managing Biological Resources The National Park Service will maintain as parts of the natural ecosystems of parks all plants and animals native to park ecosystems. The term plants and animals refers to all five of the commonly recognized kingdoms of living things and includes such groups as flowering plants, ferns, mosses, lichens, algae, fungi, bacteria, mammals, birds, reptiles, amphibians, fishes, insects, worms, crustaceans, and microscopic plants or animals. The Service will successfully maintain native plants and animals by preserving and restoring the natural abundances, diversities, dynamics, distributions, habitats, and behaviors of native plant and animal populations and the communities and ecosystems in which they occur; restoring native plant and animal populations in parks when they have been extirpated by past human-caused actions; and minimizing human impacts on native plants, animals, populations, communities, and ecosystems, and the processes that sustain them. (emphasis added) The two critical issues within the above requirement are the definition of plants and animals and the definition of how these plants and animals are to be managed, which is by 1) by preserving and restoring the natural abundances, diversities, dynamics, distributions, habitats, and behaviors of native plant and animal populations and the communities and ecosystems in which they occur; and 2) minimizing human impacts on native plants, animals, populations, communities, and ecosystems, and the processes that sustain them. From a biological resources perspective this is the purpose and need for the EIS as it relates to GCNRA, and must be at the fore of the purpose and need and at the fore of the alternatives. The preferred alternative must fully comply with the above direction. It must be noted here that much of the arid west, particularly the BENM area did not evolve with large herbivores. So the systems here are not capable of withstanding the massive soil disturbance and resultant loss of BSC that these large, non-native livestock cause. Further, the vegetation did not evolve with significant herbivory as well, so a grazed area will have species that are not tolerant of grazing reduced or eliminated. The requirement to maintain the natural abundances, diversities, dynamics, distributions, habitats, and behaviors of native plant populations can not be met with livestock grazing. Clearly, the above policy requires the preservation and restoration of BSC to its natural abundances, diversities, dynamics, [and] distributions yet livestock have functionally eliminated BSC from all grazed areas in the Park. Again, turning back to the NPSs Management Policies 2006: 1.4.4 The Prohibition on Impairment of Park Resources and Values While Congress	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. In this case, discretionary livestock grazing are causing a wide range of impacts to Park resources, a number of them clearly fitting the NPSs definition of impairment, yet the discretionary uses continue and nothing in the materials provided by the NPS during scoping would indicate that the NPS is going to correct these impacts under any alternative. Again, the NPS specious determination that livestock grazing is a mandatory use has vitiated the process from its very inception. The BLM may argue, on behalf of the NPS, that the permanent degradation of cultural resources or severe impacts to vegetation communities and BSC are not impairment. If so I look forward to critiquing your rationale, in light of the above policies. But even if you can construct some tenuous rationale as to why these impacts are not impairment, your duties go beyond just preventing impairment. The NPSs Management Policies 2006 provide further requirements you must meet: 1.4.7.1 Unacceptable Impacts The impact threshold at which impairment occurs is not always readily apparent. Therefore, the Service will apply a standard that offers greater assurance that impairment will not occur. The Service will do this by avoiding impacts that it determines to be unacceptable. These are impacts that fall short of impairment, but are still not acceptable within a particular parks environment. Park managers must not allow uses that would cause unacceptable impacts; they must evaluate existing or proposed uses and determine whether the associated impacts on park resources and values are acceptable. For the purposes of these policies, unacceptable impacts are impacts that, individually or cumulatively, would be inconsistent with a parks purposes or values, or impede the attainment of a parks desired future conditions for natural and cultural resources as identified through the parks planning process, or create an unsafe or unhealthful environment for visitors or employees, or diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values, or unreasonably interfere with park programs or activities, or an appropriate use, or the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park. The EIS and its proposed action must fully implement these requirements: 1) Unacceptable impacts must be avoided 2) The NPS must not allow uses that would cause unacceptable impacts 3) The EIS must evaluate livestock grazing and trailing and determine whether the associated impacts on park resources and values are acceptable. The EIS must provide the full rationale as to how it came to its conclusions. 4) The EIS must specify each of the parks purposes and values and analyze and determine that individually and cumulatively whether each of those values and purposes would be impacted by the proposed action and whether the attainment of desired future conditions (see 4.4.1) for natural and cultural resources would be impeded (see definition of impede in Merriam Webster dictionary to interfere with or slow the progress of) 5) The EIS must analyze whether continued permitting of livestock grazing and trailing would create unsafe or unhealthful environment for visitors or employees. Note again previous photos of essentially open sewers of cow feces and urine. 6) The EIS must fully analyze whether continued livestock grazing would diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values (see definition of diminish in Merriam Webster dictionary to make less or cause to appear less) 7) The EIS must fully and honestly analyze whether continued livestock grazing and trailing would diminish the atmosphere of peace and tranquility of the Park If any aspect of livestock grazing results in the above impacts, then they are unacceptable impacts and therefore the NPS must not allow the uses that would cause unacceptable impacts.		
14767-76	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Regarding archeological resources, the NPSs Management Policies 2006 states: 5.3.5.1.1 Preservation Archeological resources will be maintained and preserved in a stable condition to prevent degradation and loss. The condition of archeological resources will be documented, regularly monitored, and evaluated against initial baseline data. Parks are encouraged to enlist concerned local citizens in site stewardship programs to patrol and monitor the condition of archeological resources. 5.3.5.1.4 Protection Archeological resources will be protected against human agents of destruction and deterioration whenever practicable. The definition of practicable is capable of being put into practice or of being done or accomplished. Note that the definition does not include political considerations, but is a physical consideration. Turning back to the fundamental issue that the EIS must address: 8.1.1 In exercising its discretionary authority, the Service will allow only uses that are (1) appropriate to the purpose for which the park was established, and (2) can be sustained without causing unacceptable impacts. Recreational activities and other uses that would impair a parks resources, values, or purposes cannot be allowed. The only exception is when an activity that would cause impairment is directly and specifically mandated by Congress. The fact that a park use may have an impact does not necessarily mean it will be unacceptable or impair park resources or values for the enjoyment of future generations. Impacts may affect park resources or values and still be within the limits of the discretionary authority conferred by the Organic Act. In these situations, the Service will ensure that the impacts are unavoidable and cannot be further mitigated. Even when they fall far short of impairment, unacceptable impacts can rapidly lead to impairment and must be avoided. For this reason, the Service will not knowingly authorize a park use that would cause	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			unacceptable impacts. When a use is authorized by law but not mandated, and when the use may cause unacceptable impacts on park resources or values, the Service will avoid or mitigate the impacts to the point where there will be no unacceptable impacts; or, if necessary, the Service will deny a proposed activity or eliminate an existing activity. (emphasis added) The EIS and final decision must fully comply with each of the above requirements.		
14767-78	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The NPSs Management Policies 2006 contain specific direction for agricultural activities within NPS lands: 8.6.8.2 Agricultural livestock grazing will use best management practices to protect park resources, with particular attention being given to protecting wetland and riparian areas, sensitive species and their habitats, water quality, and cultural resources. Managers must regulate livestock so that (1) ecosystem dynamics and the composition, condition, and distribution of native plants and animal communities are not significantly altered or otherwise threatened; and (2) cultural values are protected. A comprehensive monitoring program must be implemented, and adaptive management practices must be used to protect park resources. Again, the EIS must analyze and the ROD must implement actions needed to: 1) Protect all park resources and values 2) Protect wetland and riparian areas 3) Protect Sensitive Species 4) Protect water quality 5) Protect cultural resources 6) Protect ecosystem dynamics and the composition, condition, and distribution of native plants and animal communities are not significantly altered or otherwise threatened 7) Implement a comprehensive monitoring program and adaptive management to protect park resources.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-80	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	4.6.3 Water Quality The pollution of surface waters and groundwaters by both point and nonpoint sources can impair the natural functioning of aquatic and terrestrial ecosystems and diminish the utility of park waters for visitor use and enjoyment. The Service will determine the quality of park surface and groundwater resources and avoid, whenever possible, the pollution of park waters by human activities occurring within and outside the parks. The Service will work with appropriate governmental bodies to obtain the highest possible standards available under the Clean Water Act for the protection for park waters; take all necessary actions to maintain or restore the quality of surface waters and groundwaters within the parks consistent with the Clean Water Act and all other applicable federal, state, and local laws and regulations; (emphasis added) Most of the livestock accessible surface waters within GCNRA are in a degraded condition based on the NPSs own data, yet no monitoring of water quality or avoidance of pollution has been done by the NPS. The NPS has not taken all necessary actions to maintain and restore water quality and the scoping notice does not propose them. DO-12 requires that in all NEPA processes it is essential that NPS management decisions (1) be scientifically informed, and (2) insist on resource preservation as the highest of many worthy priorities. (emphasis added) The NPS will abide by all CEQ NEPA regulations (40 CFR 1500-1508) and any other procedures and requirements imposed by other higher authorities, such as the Department of the Interior (DOI). This Order is not intended, however, to document all those procedures and requirements; for a comprehensive compilation, employees must refer to Handbook 12. (DO-12 at Section 2) 4.1 Sources of NEPA Guidance. The NPS will comply with the substantive and procedural requirements of NEPA, 40 CFR Parts 1500-1508, 43 CFR Part 46, 516 DM, and any additional NPS procedures or instructions regarding NEP A. 4.3 Full and Open Evaluation. The procedures contained in Handbook 12 will ensure that both adverse and beneficial impacts of NPS proposed actions are fully and openly evaluated before actions are taken that may impact the human environment. This evaluation must include provisions for: Meaningful participation by the public and other stakeholders; Development and critical evaluation of alternative courses of action; Rigorous application of scientific and technical information in the planning, evaluation and decision-making processes; Use of NPS knowledge and expertise through interdisciplinary teams and processes; and Aggressive incorporation of mitigation measures, pollution prevention techniques, and other principles of sustainable park management in all actions. 4.5 NPS management decisions will be based on technical and scientific studies properly considered and appropriate to the decisions made. In making decisions, the NPS will articulate a reasoned connection between the technical and scientific information considered and the final agency action. Technical and scientific information that is essential in making a well-reasoned decision will be obtained even though such information may not be readily available. If such information cannot be obtained due to excessive cost or technical impossibility, the proposed alternative should be modified to eliminate the action causing the unknown or uncertain impact or another alternative may be selected. (emphasis added) Moving to the related DO-12 Handbook, we wish to highlight the following critical components of the Handbook: Section B - The processes described in this handbook are binding on all NPS personnel. Under the terms of the National Parks Omnibus Management Act of 1998, the Secretary shall take such measures as are necessary to assure the full and proper utilization of the results of scientific study for park management decisions. In each case in which an action undertaken by the National Park Service may cause a significant adverse effect on a park resource, the administrative record shall reflect the manner in which unit resource studies have been considered. The development of alternatives, analysis of impacts, and incorporation of the best available information, coupled with identification of environmentally preferable courses of action as called for in this handbook, are one set of steps required in meeting this obligation to the public. Section 1.2 D - The detailed and scientifically valid study of impacts and alternatives, and appropriate input from the public, must be available before a federal agency makes any commitment of resources. Unfortunately, the NPS has	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument. Under the Proposed Plan, agencies would conduct comprehensive water quality monitoring in cooperation with the State of Utah UDWQ to track conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects (see RMP Chapter 2 Water Resources). Additionally, the BLM plans to continue AIM monitoring across the Monument to understand watershed health. See RMP Appendix K for additional details on AIM Monitoring. BLM and USDA Forest Service plan to comply with management actions recommended by UDWQ in TMDL reports related to improving water quality conditions in watersheds that are deemed to be impaired and not meeting state water quality standards (see Chapter 2 Water Resources, Management Actions Common to All Alternatives). NFS National Watershed Condition Framework assesses the condition of watersheds that intersect NFS lands. Priority watersheds are identified using the Watershed Condition Framework to focus on maintaining or improving watershed condition every 5 years (or sooner if needed).

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			already made the commitment of resources, but the rest of this requirement must be complied with in the EIS process.		
14767-83	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Since the Park was created there has been significant problems with trespass livestock, with resultant significant degradation to Park resources and values. The NPSs approach to dealing with this constant and repeated trespass has been woefully inadequate and ineffective. The EIS needs to address this failure and implement clear and punitive actions to avoid promoting and rewarding trespass as is the case now. In such cases the NPS needs to implement actions under DO 14 and its handbook as part of all action alternatives.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-84	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	DO 41 provides requirements for the management of Wilderness and proposed Wilderness. The majority of the project area is proposed Wilderness. Please review the entire contents of DO 41 and apply it to the EIS process.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-85	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section 6 of Reference Manual 41 also must be implemented in the EIS and ROD.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-86	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The EIS and its analyses must also comply with DO 79 and 305 DM 3.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-87	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The EIS and its analyses must also comply with DO 77 1.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-88	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Manual 75 provides direction for the development and implementation of monitoring and assessment. A full monitoring plan must be developed and included in the DEIS. Implementation of it must be fully funded and mandatory. NPS Manual 75 requires that you maintain a comprehensive monitoring program: NPS policy requires that park managers know the nature and condition of the natural resources under their stewardship, have the means to detect and document changes in those resources, and understand the forces driving the changes, in order to fulfill the NPS mission of conserving parks unimpaired.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-89	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Moving back to the NPSs Management Policies 2006: The Senate committee report stated that under the Redwood amendment, The Secretary has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever actions and seek whatever relief as will safeguard the units of the national park system. Either from the perspective of archeological resources or vegetative or ESA listed species or riparian conditions or other natural resources, GCNRAs current authorization of livestock grazing, and its failure to require compliance with NPS policies, is a derogation of your duties as well as a violation of the Organic Act and the Redwoods Act. This failure needs to be clearly and effectively corrected in the EIS and ROD. This is echoed in the Management Policies 2006: 1.4.3 The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. This mandate is independent of the separate prohibition on impairment and applies all the time with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired. NPS managers must always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values.(emphasis added) Of particular note above is the clear mandate separate and independent of the prohibition on impairment, the mandate to conserve park resources and values. The above requires the NPS to always seek ways to avoid, or to minimize to the greatest extent practicable, adverse impacts on park resources and values. The NPS authorized actions must avoid or minimize to the greatest extent practicable all adverse impacts.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-90	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The GMP provided that: grazing allotments would be monitored to establish trends and identify early warning signs of significant deterioration of natural resources. Every effort would be made to restore natural areas once subject to intensive disturbance, outside of the historic district. Special attention would be given to preserving vegetative habitats that contain uncommon species or that are of special interest, such as riparian communities (GMP at 55) Here again, in the 20+ years since the GMP was put in place this has not occurred. This failure must be addressed and corrected in the EIS and ROD.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-91	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The GMP ROD stated: All practical measures to avoid or minimize environmental impacts that could result from implementing the selected action have been identified in the Impacts by Alternative section of the Final EIS, including soil protection; protection of floodplains, wetlands, and water resources; protection of wilderness values including visual resources; protection of threatened, endangered and rare species; protection of properties on or eligible for listing on the National Register of Historic Places; protection of Indian sacred sites; and enhancing visitor education about sensitive park resources. Monitoring natural, cultural and visitor resources will enable the park to determine if impacts are occurring and will guide implementation of mitigation measures to protect the resources. Yet again there is little evidence that all practical measures to avoid or minimize environmental impacts related to livestock grazing and trailing have been implemented in the 20+ years since the ROD was signed. In fact, the record is clear that the NPS through the BLM has failed	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			to take effective actions to protect park resources and certainly has not taken all practical measures to protect a wide range of resources and values such as: 1) Endangered Species 2) Riparian areas 3) Visitor impacts 4) Biological soil crust 5) Restoration of healthy vegetative communities This longstanding failure must be honestly addressed in the EIS and clear and enforceable measure implemented in the ROD to correct these failures.		
14767-92	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In Section 2.1.2: the Park Service will identify reasonable alternatives and analyze and compare their differences with respect to consistency with the parks purpose, the quality of visitor experiences, the impacts on park resources, short- and long-term costs, and environmental consequences that may extend beyond park boundaries. In Section 4.1: The Service will not intervene in natural biological or physical processes, except when directed by Congress; in emergencies in which human life and property are at stake; to restore natural ecosystem functioning that has been disrupted by past or ongoing human activities; or when a park plan has identified the intervention as necessary to protect other park resources, human health and safety, or facilities. The permitting of livestock grazing clearly intervenes with natural biological and physical processes. Taking just the example of biological soil crust (BSC), which is a foundational component of the ecosystem. Where livestock grazing takes place BSC is functionally eliminated. None of the exception above apply.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-93	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In Section 4.1.1: 4.1.1 Planning for Natural Resource Management Each park with a significant natural resource base (as exemplified by participation in the Vital Signs component of the Natural Resource Challenge) will prepare and periodically update a long-range (looking at least one to two decades ahead) comprehensive strategy for natural resource management. This long-range strategy will describe the comprehensive program of activities needed to achieve the desired future conditions for the parks natural resources. It will integrate the best available science and prescribe activities such as inventories, research, monitoring, restoration, mitigation, protection, education, and management of resource uses. The strategy will also describe the natural-resource-related activities needed to achieve desired future conditions for cultural resources (such as historic landscapes) and visitor enjoyment. Similarly, planning for park operations, development, and management activities that might affect natural resources will be guided by high-quality, scientifically acceptable information, data, and impact assessment. Where existing information is inadequate, the collection of new information and data may be required before decision-making. Long-term research or monitoring may also be necessary to correctly understand the effects of management actions on natural resources whose function and significance are not clearly understood. This Natural Resource Management Plan appears to have never been written, yet it should form the basis of this EIS process. Neither the desired future conditions have been defined nor have actions needed to achieve them been set forth.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-94	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	4.1.5 Restoration of Natural Systems The Service will reestablish natural functions and processes in parks unless otherwise directed by Congress. Landscapes disturbed by natural phenomena, such as landslides, earthquakes, floods, hurricanes, tornadoes, and fires, will be allowed to recover naturally unless manipulation is necessary to protect other park resources, developments, or employee and public safety. Impacts on natural systems resulting from human disturbances include the introduction of exotic species; the contamination of air, water, and soil; changes to hydrologic patterns and sediment transport; the acceleration of erosion and sedimentation; and the disruption of natural processes. The Service will seek to return such disturbed areas to the natural conditions and processes characteristic of the ecological zone in which the damaged resources are situated. The Service will use the best available technology, within available resources, to restore the biological and physical components of these systems, accelerating both their recovery and the recovery of landscape and biological community structure and function. Efforts may include, for example removal of exotic species removal of contaminants and nonhistoric structures or facilities restoration of abandoned mineral lands, abandoned or unauthorized roads, areas overgrazed by domestic animals, or disrupted natural waterways and/or shoreline processes restoration of areas disturbed by NPS administrative, management, or development activities (such as hazard tree removal, construction, or sand and gravel extraction) or by public use restoration of natural soundscapes restoration of native plants and animals restoration of natural visibility The EIS and ROD must fully implement this requirement.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-95	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	4.1.6 Compensation for Injuries to Natural Resources The Service will use all legal authorities that are available to protect and restore natural resources and the environmental benefits they provide when actions of another party cause the destruction or loss of, or injury to, park resources or values. As a first step, damage assessments provide the basis for determining the restoration and compensation needs that address the publics loss and are a key milestone toward the ultimate goal, which is restoration, replacement, and/or reclamation of resources for the American public. Pursuant to applicable provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980; the Oil Pollution Act of 1990; the Federal Water Pollution Control Act (as amended by the Clean Water Act of 1977); and the National Park System Resource Protection Act, the Service will determine the injury caused to natural resources, assess all appropriate damages, and monitor damages; seek to recover all appropriate costs associated with responses to such actions and the	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			costs of assessing resource damages, including the direct and indirect costs of response, restoration, and monitoring activities; and use all sums recovered in compensation for resource injuries to restore, replace, or acquire the equivalent of the resources that were the subject of the action. As stated previously, the NPS and BLM have failed to comply with this requirement in regards to damages caused by authorized or trespass livestock. These requirements must be implemented as actions common to all alternatives.		
14767-96	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	4.4.2.1 NPS Actions That Remove Native Plants and Animals Whenever the Service removes native plants or animals, manages plant or animal populations to reduce their sizes, or allows others to remove plants or animals for an authorized purpose, the Service will seek to ensure that such removals will not cause unacceptable impacts on native resources, natural processes, or other park resources. (emphasis added) This requirement must be implemented in the EIS and ROD.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-97	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	4.4.2.3 Management of Threatened or Endangered Plants and Animals The Service will survey for, protect, and strive to recover all species native to national park system units that are listed under the Endangered Species Act. The Service will fully meet its obligations under the NPS Organic Act and the Endangered Species Act to both proactively conserve listed species and prevent detrimental effects on these species. To meet these obligations, the Service will: cooperate with both the U.S. Fish and Wildlife Service and the NOAA Fisheries to ensure that NPS actions comply with both the written requirements and the spirit of the Endangered Species Act. This cooperation should include the full range of activities associated with the Endangered Species Act, including consultation, conferencing, informal discussions, and securing all necessary scientific and/or recovery permits; undertake active management programs to inventory, monitor, restore, and maintain listed species habitats; control detrimental nonnative species; manage detrimental visitor access; and reestablish extirpated populations as necessary to maintain the species and the habitats upon which they depend; manage designated critical habitat, essential habitat, and recovery areas to maintain and enhance their value for the recovery of threatened and endangered species; cooperate with other agencies to ensure that the delineation of critical habitat, essential habitat, and/or recovery areas on park-managed lands provides needed conservation benefits to the total recovery efforts being conducted by all the participating agencies; participate in the recovery planning process, including the provision of members on recovery teams and recovery implementation teams where appropriate; cooperate with other agencies, states, and private entities to promote candidate conservation agreements aimed at precluding the need to list species; and conduct actions and allocate funding to address endangered, threatened, proposed, and candidate species. The National Park Service will inventory, monitor, and manage state and locally listed species in a manner similar to its treatment of federally listed species to the greatest extent possible. In addition, the Service will inventory other native species that are of special management concern to parks (such as rare, declining, sensitive, or unique species and their habitats) and will manage them to maintain their natural distribution and abundance. This requirement must be implemented in the EIS and ROD.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
14767-98	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section 4.6.6 - The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. Section 5.2 - To gain this understanding, the Service must obtain baseline data on the nature and types of cultural resources, and their (1) distribution; (2) condition; (3) significance; and (4) local, regional, and national contexts. Superintendents will ensure full consideration of the parks cultural resources and values in all proposals for operations, development, and natural resource programs, including the management of wilderness areas. When proposed undertakings may adversely affect national historic sites, national battlefields, and other predominantly cultural units of the national park system that were established in recognition of their national historical significance, superintendents will provide opportunities for the same level of review and consideration by the Advisory Council on Historic Preservation and the Secretary of the Interior that the Advisory Councils regulations require for undertakings that may adversely affect national historic landmarks (36 CFR 800.10). Section 5.2.1 - Each superintendent will consult with outside parties having an interest in the parks cultural resources or in proposed NPS actions that might affect those resources, and provide them with opportunities to learn about and comment on those resources and planned actions. Consultations on proposed NPS actions will take place as soon as practical and in an appropriate forum that ensures, to the maximum extent possible, effective communication and the identification of mutually acceptable alternatives. The Service will establish and maintain continuing relationships with outside parties to facilitate future collaboration, formal consultations, and the ongoing informal exchange of views and information on cultural resource matters. 5.3.5.1.1 Preservation Archeological resources will be maintained and preserved in a stable condition to prevent degradation and loss. The condition of archeological resources will be documented, regularly monitored, and evaluated against initial baseline data. In accordance with 8.2.3.1 permittees are not allowed to use motorized vehicles off designated roads. This requirement must be common to all alternatives. Further, 8.6.1.1 requires: A superintendent must deny initial requests or requests for renewal upon finding that the proposed activity would cause unacceptable impacts. The superintendent likewise must terminate previously authorized special park uses based on such a finding. (emphasis added)	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-99	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Another requirement that has been conveniently ignored by the NPS and BLM is: 8.6.1.2 Fees Cost recovery and performance bond and liability insurance requirements will be imposed, consistent with applicable statutory authorities and regulations. All costs incurred by the Service in receiving, writing, and issuing the permit, monitoring the permitted use, restoring park areas, or otherwise supporting a special park use may be paid by the permittee. The money will be retained by the park as reimbursement. When appropriate, the Service will also collect a fee for the use of the land or facility based on a market evaluation. Fees collected for use of the land or facility will be deposited into the U.S. Treasury. (emphasis added) The NPS has ignored this requirement, but it must be included as common to all alternatives. The Cost of this EIS process must also be included.	DECI07-Compliance with other laws and policies	National Park Service lands are under the jurisdiction of the National Park Service and are not within the boundaries of Bears Ears National Monument.
16960-1			Managing paleontological resources on federal lands with scientific principles and expertise is mandated by the Paleontological Resources Preservation Act of 2009, which includes managing a permitted research program.	DECI07-Compliance with other laws and policies	The agencies considered the comment. Value as used in the goal and objective could include but would not be limited to scientific value.
17573-23	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The Establishment Clause prohibits the government from establishing a religion. The Free Exercise Clause protects citizens right to practice their religion as they please, so long as the practice does not run afoul of public morals or a compelling governmental interest. The Equal Protection Clause of the Fourteenth Amendment of the Constitution prohibits States from denying to any person within its jurisdiction the equal protection of the laws. Essentially this has been interpreted for 176 years as requiring the states to treat similarly situated individuals equally under the law. In 1954, the Equal Protection Clause was reversely incorporated to apply to the Federal Government through the Fifth Amendment of the Constitution. ¹² The State encourages the Agencies to reanalyze this RMP/EIS and ensure that it is not violating these Constitutional provisions on its face, or that it cannot be interpreted and applied unconstitutionally. For example, the term spiritual is found 33 times, religious or religion is found 76 times, culture 23 times, cultural 877 times ¹³ , and culturally 139 times within the RMP/EIS. The Agencies should be very wary of adopting any provision, regardless of who supports it, that promotes one group of people over another based on religion, cultural/heritage, race, nationality, etc. In the last decade, the courts have increasingly found reverse discrimination to be unconstitutional discrimination in cases ranging from college admissions ¹⁴ to employment law, and everywhere in between. Executive orders like the Proclamation do not get to bypass the provisions of the United States Constitution, nor do the Agencies in their planning. Therefore, the Agencies should take an added measure of time to reevaluate and reanalyze this plan through the lens of the United States Constitution.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations.
17573-25	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Certainly, there is an entire volume dedicated to data and analysis that the Agencies have purported to have studied in carrying out this planning process. However, a review of the List of Preparers includes 20 individuals with no stated qualifications (expertise, experience, professional disciplines) and makes no attempt to [shall] identify the persons who are responsible for a particular analysis, including analyses in background papers as is required by 40 CFR 1502.18. This deficiency within the RMP/EIS is either an instance of incomplete information that requires the issuance of a supplemental document, or it is the Agencies blatant disregard of NEPAs requirement to use natural and social sciences in favor of preferences and opinion. Either way, it is problematic, legally deficient, and needs to be remedied.	DECI07-Compliance with other laws and policies	The list of preparers in Appendix O was updated consistent with 40 CRF 1502.18. Consistent with Proclamation 10285, the agencies coordinated with the BEC and others to ensure that management decisions in the Proposed Plan reflect expertise and traditional and historical knowledge of the Tribal Nations. An additional list of individuals who participated in that effort are acknowledged in Appendix O. The agencies' meeting with the BEC complied with both applicable laws and regulations.
17573-27	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The RMP/EIS falls short of the requirements under 40 CFR 1502.18 which states that the EIS shall list the names, together with their qualifications (expertise, experience, professional disciplines) of the persons primarily responsible for preparing the environmental impact statement or significant background papers, including basic components of the statement. Simply listing tribal affiliation does not meet this requirement and calls into question all reliance or deference given to those preparers. It appears the Agencies have been relying on individuals to assist in drafting the plan who are not members of a cooperating agency, not members of the BEC, who by definition must at a minimum be violating FACA or the NEPA implementing regulations.	DECI07-Compliance with other laws and policies	Appendix O was updated to include the list of preparers consistent with 40 CRF 1502.18. Consistent with Proclamation 10285, the agencies coordinated with the BEC and others to ensure that management decisions in the Proposed Plan reflect expertise and traditional and historical knowledge of the Tribal Nations. An additional list of individuals who participated in that effort are acknowledged in Appendix O. The agencies' meeting with the BEC complied with both applicable laws and regulations.
17573-29	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The RMP/EIS fails to follow the plain language of the Proclamation establishing BENM. The Proclamation calls out many non-indigenous objects and lifestyles from Mormon Pioneers to cattle ranching and outlaws. It discusses the importance of the Bears Ears landscape to convey the story of the westward expansion of European Americans and the migration of Hispanic shepherders. However, the RMP/EIS fails to recognize or accommodate those elements of the Proclamation. For example, westward expansion cannot be told within BENM without the robust roads and trail systems critical to that westward expansion and settlement. Rather than preserve those roads and trails and allow them to tell their story, the preferred alternative aggressively closes and destroys that history. Western migration is a history of horses, wagons, cattle trucks, and ore trucks not customized mountain bikes and modern ultralight backpacking packs. It is a history of discovery, rather than the exclusion and restriction championed in the RMP/EIS. Additionally, cattle grazing is a living history lesson of those historical elements found within the Proclamation. There couldnt be cattle-ranching cabins without the cattle and the ranchers. Additionally, the Proclamation notes [e]lk Ridge has a long history of livestock grazing by Navajo and Ute families and later Anglo settlers. This could not have happened without the cattle. Therefore, under this Administrations interpretation of the	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with the Antiquities Act, Proclamation 10285, and the protection of the objects identified therein. While livestock grazing is a use noted in the Proclamation, it is not itself an object.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			Antiquities Act, cattle grazing is a monument object that requires protection. Although Proclamation 10285 is invalid as explained in litigation now before the Tenth Circuit, assuming it is valid, the Agencies have been arbitrary and capricious in excluding grazing from monument protection. The Agencies have interpreted a partial, out-of-context sentence as allowing them to minimize or impact grazing. However, the State encourages the Agencies to read the entire paragraph. When read in context, it is apparent that cattle grazing is a monument object that requires protection within BENM. Therefore, any exclusion or minimization of grazeable acres is an unacceptable violation of the Proclamation. It is imperative to the future of BENM that the Agencies create an RMP/EIS that conforms with federal law, case law, and even the Proclamation.		
17573-4	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	However, the Antiquities Act does not authorize the President, nor the Presidents Executive Agencies, including BLM and Forest Service, to alter the NEPA process or the Congressionally designed management process. This plan, for the reasons described herein, as well as those outlined in previous comments, emails, letters, and CA meeting discussions, has deviated from Congressional authorization and violates countless federal laws, including NEPA, the APA, FLPMA, NFMA, Clean Water Act, Clean Air Act, the Antiquities Act, the Dingell Act, as well as others. The plan also contravenes multiple sections of the United States Constitution, including the First Amendments protections of freedom of assembly and free exercise of religion, and the Fifth and Fourteenth Amendments Equal Protection clauses. The only remedy available to the Agencies is to reverse their alleged progress and restart the planning in a way that ensures compliance with the Constitution, Federal Law, and Agency Policy.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations.
17573-42	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The States SRMP does not support the expansion of special designations such as lands with wilderness characteristics (LWC), which restrict access without the consent of the local government. 20 Here, the alternatives are full of special designations such as LWC, management zones, and travel management area designations that unnecessarily restrict access without the consent of local governments.	DECI07-Compliance with other laws and policies	The Proposed Plan addresses LWC in the Special Designations section of Chapter 2; management zones are discussed in the Recreation and Visitor Services section of Chapter 2; and travel management area designations are discussed in the Travel and Transportation Management section of Chapter 2. See the Inconsistency Appendix, Appendix S for a summary of where the BLM/USDA Forest Service and Cooperator disagree on substantive elements of the RMP/EIS.
17573-76	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	DWR encourages the BENM RMP to reference the DWRs authority to manage and regulate wildlife as defined in Presidential Proclamations 9558, 9681, and 10285, which created BENM. The Proclamation reads, Nothing in this proclamation shall be deemed to enlarge or diminish the jurisdiction of the State of Utah, including its jurisdiction and authority with respect to fish and wildlife management.	DECI07-Compliance with other laws and policies	Under all action alternatives, habitat for species conservation will be managed in coordination with UDWR, and agencies would collaborate with UDWR in the introduction, transplantation, augmentation, and re-establishment of native species (See Chapter 2, sections on Wildlife and Fisheries and Special Status Species).
17573-97	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.8.2 Management Actions Common to All Action Alternatives (page 2-29) There is a current effort by the BLM and USFS regarding old-growth pinyon and juniper forest management, identified in EO 14072, to define and inventory old-growth forests. This effort includes a robust opportunity for public comments. This planning effort could affect Section 2.4.8 of the BENM plan. The BENM plan should address how it will be affected by the EO 14072 old-growth pinyon and juniper efforts, and the BENM plan should address how these processes will affect each other.	DECI07-Compliance with other laws and policies	The Proposed Plan would comply with the directives in EO 14072.
17601-10	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	TRANSLOCATION OF SPECIAL STATUS SPECIES Per Sections 2.4.11.3 and 2.4.12.3 of the draft RMP/EIS, the translocation of special status species would be allowed within BENM under all alternatives. The RMP/EIS should recognize and reference the authority of the State of Utah to manage and regulate wildlife within the BENM. The Utah Legislature has provided the Division of Wildlife Resources (UDWR) management authority over wildlife and its parts. Introductions and transplants of wildlife are under the purview of DWR. DWR will work within their regulations to prioritize and coordinate translocations. TLA cautions against the translocation of wildlife species that may have detrimental effects to revenue generating activities on trust lands such as agricultural production or livestock grazing.	DECI07-Compliance with other laws and policies	Under the Proposed Plan, agencies would collaborate with the BEC, UDWR, and USFWS in the introduction, transplantation, augmentation, and re-establishment of native species (See Chapter 2, sections on Wildlife and Fisheries and Special Status Species).
17601-12	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	TLA PREFERRED ALTERNATIVE As per FLPMA, the federal agencies must develop a broad range of alternatives when formulating land management plans to ensure comprehensive analysis and decision-making. However, the proposed alternatives in this RMP/EIS are often so similar for each resource that they fail to present a diverse range of options. This lack of differentiation limits the scope of the analysis and undermines the objective of considering various potential impacts and strategies, ultimately reducing the effectiveness of the planning process. A proper range of alternatives is essential to fully evaluate and balance environmental, economic, and social considerations in land management.	DECI07-Compliance with other laws and policies	The alternatives analyzed in the RMP/EIS include a range of management actions that provide for the proper care and management of the Monument objects and values identified in Presidential Proclamation 10285. In Section 2.2, the agencies considered, but dismissed from further analysis, alternatives aimed at increasing motorized access. See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS and for which the EIS is compliant.
18082-12	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS does not include metrics that are important for determining if the goals and objectives are being, or will be, met. It is important that the RMP present a framework of metrics within the goals and objectives since metrics provide benchmarks for determining whether objectives and goals are being or will be achieved. BLM Manual 6220, Section 1.6(G)(4)(b) states that land use plans must identify specific and measurable goals and objectives for each object and value, as well as generally for the Monument or NCA. We recommend the RMPs goals, objectives, and management actions all correlate, build upon one another, and include meaningful metrics.	DECI07-Compliance with other laws and policies	The Proposed Plan includes management actions to restore and protect BENM resource objects as well as goals and objectives for them.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18082-3	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS lists the Tribes with which the BLM and the USFS have conducted Tribal consultation (starting on p. 4-1). In conjunction with Tribal consultation, we recommend that the BLM and the USFS consider impacts on any Tribal treaty rights within the BENM, pursuant to key federal policies on treaty rights, such as the 2021 Memorandum of Understanding Regarding Interagency Coordination and Collaboration for the Protection of Tribal Treaty Rights,2 and the 2022 Best Practices for Identifying and Protecting Tribal Treaty Rights, Reserved Rights, and Other Similar Rights in Federal Regulatory Actions and Federal Decision-Making3. We recommend cross-referencing Section 7 of the Best Practices document with the Tribal consultation procedures proposed for the RMP to ensure that all relevant policies (e.g., treaty rights, Tribal sovereignty rights, etc.) are considered and that a similar level of opportunity for early and adaptable engagement is available under the BLMs EIS development process.	DECI07-Compliance with other laws and policies	The agencies have considered Tribal Nation's Treaty rights and their trust responsibilities to Tribal Nations. The Proposed RMP/Final EIS followed applicable laws, regulations and policies (Appendix B). The agencies are following applicable USDA and DOI policies concerning Tribal Nations, including EO 13175. Additionally, the agencies have developed a co-stewardship agreement with the five Tribal Nations that make up the BEC, see Chapter 2 section Tribal Co-stewardship and Appendix C. The agencies have developed the Proposed RMP/Final EIS in close collaboration with the BEC and will continue to collaborate with the BEC in implementation planning and implementation-level projects.
18112-1	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	the draft revisions to the Plan provide only vague information, at best, on several topics, which prevents Blanding City and its constituents from being able to make informed comments on those topics. The topics include (A) allotment quantities for grazing (and even knowing which allotments the Plan will affect), (B) off-highway-vehicle use and dispersed camping, (C) recreational shooting, (D) the 3 Bears Ears Coalition, and (E) proposed road closures. The Bureaus failure to communicate necessary information to the affected public on topics that are vital to their economic livelihoods is a violation of NEPA and its regulations, and it is inconsistent with NEPAs purpose. The proposal is therefore unreasonable which is to say, arbitrary and capricious under the Administrative Procedure Act.	DECI07-Compliance with other laws and policies	Appendix O outlines public engagement opportunities throughout the planning process. Information on the Draft RMP/EIS was provided at five in-person public meetings and two virtual public meetings.
18112-21	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	To be sure, the Bureau is not legally responsible for the Presidents unlawful actions in defiance of the smallest area limit in the Antiquities Act. But the Bureau is legally responsible for its own unlawful actions. See 5 U.S.C. 706. And the Bureau only has authority to make and revise resource-management plans, such as the Bears Ears Plan, as directed by Congress in FLPMA. See 43 U.S.C. 1712. The Bureau knows this and acknowledges it throughout the proposed revisions. E.g., Draft Plan 1-1, 1-8, 3-190. And while one federal court has deferred to the Bureau on the point that it can ignore the multiple-use mandate within the boundaries of a national monument, see W. Watersheds Project v. Abbey, 719 F.3d 1035, 1042 (9th Cir. 2013), that courts decision and reasoning would not be binding on a court reviewing a revised plan for Bears Ears. Here, following an unlawful over-designation of monument land by President Biden, the Bureau is unlawfully placing a chokehold on the economic viability of communities like Blanding City. The City will not be able to provide water to its constituents, it will suffer from the strangling of industries including ranching and recreation, and it will not even be able to benefit from the State Land Trusts collection of revenues, where its public schools will feel the brunt of the plans effects.	DECI07-Compliance with other laws and policies	The agencies collaborated with cooperating agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the Blanding City, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the City as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the cooperating agencies, the agencies made changes to the Proposed Plan including coordination with the local governments, where appropriate to ensure coordination on management of the Monument and implementation of the RMP, and added ROW open areas along paved highways.
18657-10	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Furthermore, UPLA contests the validity of the RMP based on the planning teams failure to evaluate alternative means to accomplish the goal of the action, and, rigging of the purpose and need section of a NEPA process to limit the range of alternatives. The Purpose and Need, and the content of Alternatives A, B, C, D, and E are in direct conflict with one another. We subsequently assert the legal requirement for the planning team to retract the proposed RMP to rectify this issue.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The agencies considered a reasonable range of alternatives.
18657-18	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	As currently written, each the proposed alternatives presented in the RMP would negatively impact UPLA members, as well as all members of the general public who enjoy outdoor recreation on BLM managed lands, by significantly minimizing their ability to access public land. The RMP fails to provide a true recreation alternative as required by NEPA. While Alternative A would not change existing management practices, it would therefore also fail to optimize outdoor recreation as a high-value use across the 1.36 million acres that are encompassed within Bears Ears National Monument (BENM). Alternatives B, C, D, and E would all reduce public access to outdoor recreation in a variety of significant ways. The alternatives presented in the RMP serve to diminish (at best) or eradicate (at worst) the multiple-use mandate by which the BLM and US Forest Service are required to manage public lands.	DECI07-Compliance with other laws and policies	Section 1.2 (Purpose and Need) of the RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape". Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. Alternatives considered providing non-motorized recreation opportunities to the extent consistent with protection of Monument objects The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. This approach provides management for both motorized and non-motorized recreation opportunities and outlines management objectives for each zone, management area and sub-area. See Appendix E.
18657-19	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	As designated managers, it is therefore the responsibility of the BLM and US Forest Service to optimize management protocol to balance preservation of monument objects with public access and enjoyment of all public lands within the monument boundaries. By the letter and spirit of the law in consideration of monument management directives, it is neither necessary nor prudent to restrict or eliminate public access to monument lands as the primary management tool; to do so, when alternative mechanisms for management that would effectively balance preservation of monument objects with public access, is both arbitrary and capricious. While UPLA appreciates BLM efforts to inform the public through scoping and environmental assessment as to how the RMP may impact the public through implementation of the plan, we feel the scope of the RMP falls dramatically short of	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations. See Appendix B for relevant laws and regulations.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			BLM minimum requirements to comply with legal standards for scoping and analysis of public land management plan revisions. To these points of failure in compliance, UPLA has reviewed the RMP and believes that the BLM is legally and procedurally compelled to resolve issues in the following RMP components: 1. Congressional direction, Congressional intent, and BLM operational guidelines 2. FLPMA and the Antiquities Act 3. NEPA analysis 4. Alternatives Analysis 5. First Amendment violations 6. National Monument may not by default dictate restriction or closure of public access 7. Inaccurate maps 8. Outstanding multiple-use values and cumulative impacts 9. Legal & Procedural Violations Willfully Ignored Following Public Comments 10. Discrimination of members of the public with disabilities and impoverished communities 11. Conformity with Utah State law 12. Safety impacts leading to irreparable harm 13. Transparency and ease of submitting comments by public 14. False assertion of government ownership of federally-managed public lands		
18657-2	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Since its inception as a federal agency, the BLM and Forest Service have been explicitly, and very clearly, directed to manage public lands per the multiple-use mandate5. Per the definition of multiple use within U.S. Code 1702 Title 436, the term multiple use means: The management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. For the Forest Service specifically, the 2012 Planning Rule7 further strengthens the role of multiple uses as the core, active method of management in land management plans. Section 219.10 of the 2012 planning rule requires providing for integrated, sustainable multiple uses on the planning unit as mandated by the Multiple-Use Sustained-Yield Act and the National Forest Management Act8. Under the 2012 planning rule, recreation, timber production, grazing, and other uses and benefits will continue to provide jobs, income, and ways of life for many Americans. Land management plans under the 2012 planning rule will emphasize the importance of the continued delivery of sustainable multiple uses of National Forest System lands. The RMP for BENM is problematic given that the alternatives presented serve to diminish or eradicate the purpose and implementation of the multiple-use mandate on BLM and Foret Service managed public lands. As set forth in law, the BLMs and Forest Services mission and congressional management directive is to achieve quality land management under the sustainable multiple-use management concept to meet the diverse needs of the people of the United States. The BLMs and Forest Services operational guidelines clearly state that the foundational framework for all management action is to uphold and expand the multiple-use objective, manage public lands for the benefit of the people (all citizens of the USA), to maintain transparency and accountability in all decisions and actions, to execute decisions in a way that is fair to the public, and most importantly to follow the law and congressional intent.	DECI07-Compliance with other laws and policies	The Proposed Plan complies with all applicable laws and policies. Section 302 of FLPMA states that public lands should be managed under the principles of multiple use and sustained yield “except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.” Proclamation 10285 dedicates the lands within BENM to a specific use, therefore the lands reserved within the Monument boundary must be managed in a manner that protects the objects for which the Monument has been designated. In other words, within BENM, typical multiple use management is superseded by the direction in Proclamation 10285 to protect Monument objects. Multiple uses are allowed only to the extent they are consistent with the protection of the objects within the Monument.
18657-26	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Discrimination against specific groups in public forums constitutes viewpoint discrimination, which is subject to strict scrutiny and is rarely upheld by courts (Stone, G. R., "Content-Neutral Restrictions," The University of Chicago Law Review). The Supreme Court has made clear that any regulation that discriminates based on content or viewpoint is presumptively unconstitutional. This principle was reaffirmed in cases such as Reed v. Town of Gilbert, 576 U.S. 155 (2015), where the Court struck down a town's sign code that imposed more stringent restrictions on signs related to certain subjects than on others, finding it constituted impermissible content-based regulation. Excluding specific groups from national monuments likely constitutes content or viewpoint discrimination if it targets particular messages or ideologies associated with those groups (Rosenberger v. Rector and Visitors of the University of Virginia, 515 U.S. 819 (1995)). When access to national monument public lands is restricted to exclude specific groups, the result is viewpoint discrimination, as it targets specific groups based on the messages they convey or the identities they represent. Such actions can be challenged on the following grounds: Content Neutrality: The exclusion must be content-neutral. If it targets groups based on their speech, representative identity, or expressive activities, it is unconstitutional. Narrow Tailoring and Significant Interest: Even if the restriction serves a significant interest, it must be narrowly tailored. Broad exclusions that disproportionately affect specific groups do not meet this standard. Alternative Channels: Adequate alternative channels for communication must be available. If the exclusion effectively silences the group's message, it is unconstitutional.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. See Appendix B: Laws, Regulations, Policies, and Plans considered in the Development of the Resource Management plan and Environmental Impact Statement for relevant laws and regulations. The public lands in the Monument and access to them are open to all. The management of the Monument has been informed by many stakeholders, in addition to the Federal Agency specialists and the Bears Ears Commission. Members of the public and stakeholders will continue to access the Monument and provide input on management of the Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18657-27	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The US Constitution and an extensive body of legal precedent clearly demonstrate that excluding access to specific groups on national monument public lands violates First Amendment rights by constituting unlawful content or viewpoint discrimination. The constitutional protections of free speech, assembly, and petition are robust, particularly in traditional public forums, and any exclusionary practices must meet stringent legal standards to be upheld. After reviewing the justifications presented in the draft RMP for broadscale exclusion of public access, use, and enjoyment of the public lands held within the borders of BENM exclusions for all those who are not members of tribal nations it is evident that implementation of such exclusion as federal agency land management policy would not withstand legal scrutiny.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with applicable laws and regulations.
18657-3	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The RMP will obstruct the membership of UPLA, as well as members of the general public, from accessing vital areas of BENM for organized, safe, conservation-centric recreation by eliminating access in full, or eliminating access via OHV routes, or eliminating access for a variety of outdoor recreation opportunities. Elimination of public access and failure to adhere to the multiple-use objective is a violation of Congressional direction and Congressional intent for the scope of limitations by which the BLM and Forest Service are authorized to manage our public lands. It is critical for the RMP Planning Managers to bear in mind that the BLM and Forest Service do not own our public lands. BLM and Forest Service managed lands are a part of the public endowment, as all public lands are owned by the citizens of the USA (the public); the BLM and Forest Service are merely contracted to manage those lands within the defined scope of limited authority that is granted by Congress. The RMP for BENM demonstrates that the BLM and Forest Service are overstepping Congressional direction and Congressional intent such that the best interests and needs of the public are being overrun through restriction or elimination of public access to public lands within BENM through unnecessary, arbitrary, and capricious restriction or closure of access via designated OHV routes, designated OHV riding areas, and designated outdoor recreation areas. This constitutes a violation of the rights and legal protections of the American people through unjustified application of Congressionally-directed public land management authority.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. The Purpose and Need section of Chapter 1 of the RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM." Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Members of the public and our stakeholders will continue to access the Monument and provide input on management of the Monument.
18657-33	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	While tribal interests are important, the tribes are but one stakeholder in the management of BENM, which belongs to all Americans and should be able to be used and enjoyed by all members of the general public. Giving a privileged role in the monuments management to native religious practitioners, and especially giving them special access rights (beyond those required by treaties) to monument lands that the general public does not have, unconstitutionally endorses and favors one religion over all others in violation of the First Amendment. Unless the agencies radically reverse course, the Monument Management Plan that is created through this process will be highly vulnerable to constitutional challenge on Establishment Clause grounds, and we urge the agencies to reconsider their approach. We urge the BLM and Forest Service to carefully assess all management actions proposed in the various alternatives to ensure they do not run afoul of the Establishment Clause, and to ultimately adopt a final alternative that does not explicitly favor native religious practitioners over the general American public. We also request that the agencies expressly address Establishment Clause concerns in the RMP and Record of Decision.	DECI07-Compliance with other laws and policies	The Proposed Plan would not provide special access to any specific groups of people. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
18657-36	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The designation of public land as a national monument can, at times, result in the restriction or closure of public access or multiple uses. However, by constitutional, congressional, and legal protections of public access and multiple uses, restrictions or closure of access must not constitute the default outcome of national monument resource management planning, travel management planning, and other monument planning projects. Any restrictions or closures imposed must depend on the terms of the designation and the management plans developed afterward. Management plans must strike a balance between protection of monument objects, public access, and multiple uses. We are concerned that none of the five alternatives presented demonstrate intent or effort to achieve such balance. The overarching premise behind all five alternatives is that the presence and use of the land within BENM by the American public (excluding members of native American tribes) is inherently damaging to natural and cultural resources. The use of active management and mitigation as strategies to ensure effective balance between protection of monument objects, public access, and multiple uses is wholly insufficient across alternatives A, B, and C, and is essentially disregarded in full in alternatives D and E. Recreation and economic uses of the land are portrayed within the RMP as innately damaging to the landscape a position of fundamental opposition is portrayed between public access and multiple uses, in relationship to protection of monument objects.	DECI07-Compliance with other laws and policies	Chapter 1 Purpose and Need of the RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape". Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Alternatives Considered but Not Analyzed in Detail in Chapter 2. The Proposed Plan does not exclude access, but manages access to provide both opportunities to visit BENM and to protect the objects of BENM.
18657-37	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Any public access restrictions or closures that are imposed through management planning must be guided by the principles of the Antiquities Act9 and are subject to the specific terms of the monument's designation and management plans. Restrictions and closures must be carefully considered and balanced with public and economic interests. The Antiquities Act grants the President of the United States the authority to designate national monuments to protect significant natural, cultural, or scientific features. However, this authority is not without limitations, particularly when it comes to restricting or closing public access to these lands. The scope of these limitations is shaped by both the statutory language of the Antiquities Act and judicial interpretations. The Antiquities Act mandates that the reservation of land for a national monument must be "confined to the smallest	DECI07-Compliance with other laws and policies	As described in Appendix B, Laws, Regulations, Policies, and Plans Considered in the Development of the Resource Management Plan and Environmental Impact Statement, the Antiquities Act of 1906 was considered in the development of the RMP/EIS. The decision about which lands are reserved as part of BENM is outside the scope of this plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			area compatible with the proper care and management of the objects to be protected" (54 U.S.C. 320301). This requirement limits the extent of land that can be set aside, aiming to prevent overly broad designations that unnecessarily restrict public access or multiple uses.		
18657-38	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The Antiquities Act, FLPMA, NEPA, and additional congressional mandates require that agencies conduct thorough environmental impact assessment and fully consider less restrictive alternatives when implementing management plans for national monuments. Judicial review has upheld the imperative for agencies to strike a balance between conservation goals and public access or multiple uses. Economic and social impacts on local communities must be accounted for in full, such that national monument management plans achieve balance between protection of monument objects, natural resources, and cultural values with sustainable public use.	DECI07-Compliance with other laws and policies	The Proposed Plan is consistent with all relevant laws and policies. Chapter 1, section Purpose and Need, of the RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape". Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Alternatives Considered but Not Analyzed in Detail in Chapter 2.
18657-39	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	If the BLM and Forest Service could manage balance of conservation goals with public access and multiple uses in the examples of Berryessa Snow Mountain National Monument and the DRECP (these are not isolated incidences, there are many other similar examples), then the agencies certainly have the capability to do so for the BENM RMP. However, we are gravely concerned that the agencies actions throughout scoping, alternative development, and analysis for the BENM RMP has consistently demonstrated biased preference for a narrow set of special interest groups, with general disregard for the American public and existing vested stakeholders. The statements made by agency staff and Bears Ears Commission representatives during public meetings for this RMP have reinforced the obviously biased sentiments that have shaped the content of the five alternatives in the RMP. The questions, concerns, values, and constitutional rights of the American public and non-native-American stakeholders have been placated to through lip service, then functionally disregarded. The BENM RMP does not demonstrate that the BLM and Forest Service have made a sincere or adequate attempt to ensure that restrictions or closures were carefully considered and balanced with public and economic interests. We raise an alert to caution the agencies against implementation of an alternative, or combination of alternatives, that disproportionately elevate conservation policies while trampling public access, enjoyment, and ability to continue exercising multiple uses within BENM. RMP planning managers must ensure that the RMP complies with legal standards and comprehensively considers all stakeholders' interests.	DECI07-Compliance with other laws and policies	Chapter 1, section Purpose and Need, of the RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape" . Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Alternatives Considered but Not Analyzed in Detail in Chapter 2. See Appendix O for a summary of consultation and coordination with state and local governments, the public, Tribal Nations.
18657-4	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	It is critical to note: per the stipulations set forth in FLPMA as well as the Antiquities Act, activities associated with multiple-use management, including recreation, can occur in national monuments. Incorporation of public land into national monument status does not in and of itself require, direct, nor authorize that recreation must be restricted or eliminated within the monument boundaries. Recreation remains a congressionally protected value of public lands within national monuments. FLPMA remains intact as the overarching framework for all public land management, including the management of national monuments. For national monuments, FLPMA's provisions ensure that monuments are managed in a way that conserves their unique values. National monument proclamations issued under the Antiquities Act contain specific directives and restrictions that must be incorporated into the monuments management plans. FLPMA mandates that the management plan must comply with the legal requirements set out in the proclamations. By legal definitions set forth in FLPMA and the Antiquities Act, the management of national monuments requires that FLPMA's multiple-use mandate are balanced with the specific conservation goals of the monument designation. Monument conservation does not eradicate FLPMA stipulations for public land management.	DECI07-Compliance with other laws and policies	Thank you for your comment
18657-47	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The RMP provides bearing on and addresses the validity of R.S. 2477 assertions. The plan reduces access or closes completely multiple routes that are the means of access to active mining claims. Rights of way that access mining claims are granted rights under R.S. 2477. MS-1626 Travel and Transportation Management Section 6.2 states, A travel management plan is not intended to provide evidence, bearing on, or address the validity of any R.S. 2477 assertions. R.S. 2477 rights are determined through a process that is entirely independent of the BLM's planning process. In these proceedings, whether routes have existed historically and whether they currently exist on the ground are part of the evidentiary record for R.S. 2477 claims. Closure of an R.S. 2477 route through a TMP planning process provides bearing against the validity of any R.S. 2477 assertion by erasing the primary source of evidence upon which these assertions rely: the continued existence of the route itself. As such the closure of R.S. 2477 routes through the TMP process violates MS-1626 (6.2).	DECI07-Compliance with other laws and policies	Management Actions Common to All Action Alternatives in Chapter 2 Lands and Realty was clarified to state the BLM would grant reasonable access to public lands for economic purposes on a case-by-case basis. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18657-49	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The closure of R.S. 2477 routes also creates an undue burden on active mining operations, and BLM Manual 2801.8(G) requires BLM to Recognize as an authorized use, any ROW facility constructed on public land on or before October 21, 1976, under the authority of any act repealed as to future authorization by FLPMA. No further authorization is required by the holder for [] b. A ROW for a public highway constructed on public land under R.S. 2477. During my (Loren Campbell) explorations in the area, I saw numerous mining claim stakes along routes proposed for closure in Alternative C. We believe the closure of routes that provide the sole access to valid mining claims is illegal.	DECI07-Compliance with other laws and policies	There are no RS 2477 routes located on NFS lands in BENM. The agencies would consider applications for ROWs within BENM on a case by case basis and conduct analysis consistent with applicable law. Agencies would allow authorized administrative use, consistent with the protection of BENM objects. See the Proposed Plan Lands and Realty sections for management actions pertinent to ROWs. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
18657-71	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The RMP should be in conformity with Utah State laws, especially 2024 H.B. 471 and S.B. 67. Compliance with State laws should be a stated objective of the RMP. In the event that BLM chooses not to comply with State law, an explanation should be included in the RMP.	DECI07-Compliance with other laws and policies	Appendix B, Laws, Regulations, Policies, and Plans Considered in the Development of the Resource Management Plan and Environmental Impact Statement, outlines the State laws that were considered in the development of the RMP/EIS.
18803-2	Shane Shumway Blanding, UT 84511		Our claims on BLM land, one for example is at, 37.58984, -109.60553, have also been maintained and the BLM needs to fulfill its multiple use mandate to allow mining claim owners to mine the resources within to benefit the local communities that rely on these resources.	DECI07-Compliance with other laws and policies	Under the Proposed Plan, the agencies would manage any operations that occur under the mineral leasing laws pursuant to valid existing rights in a manner that protects and mitigates impacts to the preservation, restoration, and protection of BENM objects. BENM is withdrawn from mineral entry by Presidential Proclamation. The agencies would consider applications for ROWs within BENM on a case by case basis and conduct analysis consistent with applicable law. See the Proposed Plan Lands and Realty sections for management actions pertinent to ROWs.
18803-3	Shane Shumway Blanding, UT 84511		The General Mining Act of 1872 protects our rights as a mining claim owner and all claims need to be accessible via open motorized routes that are maintained by the agencies and allowable to actually mine the resources within.	DECI07-Compliance with other laws and policies	The Proposed Plan is compliant with all applicable laws and policies. Motorized access to valid existing claims can be granted through the regular minerals management processes regardless of whether or not the access route is in an OHV closed area or not.
18803-7	Shane Shumway Blanding, UT 84511		We have 6 mining claims just outside of the Dark Canyon Wilderness area on USFS lands at coordinates, 37.79343, -109.71819. These were drilled and mapped in the 60s, 70s and 80s. 400,000 lbs of uranium have already been drilled out giving life to local economies and supporting many generations of families. Many square miles of these areas have had drill roads, drill holes, mine tunnels, muck dumps, etc. Completely excluding them as roadless areas. This is a buffer around the Wilderness and should not be designated as such. The history of this area disqualifies this land as a roadless area. The revision of Bears Ears National Monument RMP and Manti-La Sal National Forest Management Plan are inconsistent. This is a violation of NEPA as it does not allow me to provide feedback based on best available information because the agencies have too many discrepancies.	DECI07-Compliance with other laws and policies	Thank you for the comment. Designating areas as "Roadless" is outside the scope of this plan. The existing Inventoried Roadless Areas (IRAs) were designated prior to the designation of the Monument and are managed by regulation under the 2001 Roadless Rule. The USDA Forest Service is not aware of any inconsistency between the BENM Plan and the Forest Plan Revision and the commentor has not provided an example of an inconsistency that the agency can remedy.
18923-3			agreements entered into by any federal agency must be within the confines of existing law as their discretionary powers are generally codified in legislation and subsequently clarified in the courts. Thus, there is no legal means by which to preferentially incorporate tribal preferences for management of federal lands as is proposed to be common to all alternatives in Chapter 2.4.2.2 of this plan. If anything, this is illegal as it is ultimately a religious preference of one group at the expense of others.	DECI07-Compliance with other laws and policies	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. Additionally, Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process.
18965-6	Simone Griffin	BlueRibbon Coalition	BRC is concerned that attempting to protect the sacred values of the area will be the justification for the BLM preferring closure over management. BLM cites 36CFR800.6, Section 110 of the NHPA, the American Indian Religious Freedom Act (AIRFA) of 1978, Executive Order 13007, BLM Manual Section 8140 and USBR Manual LND 02-01 as relevant statutory and regulatory authorities for its preferred approach for protecting sacred and religious values on BLM lands. We have concerns that BLMs expansive reading of these authorities is out of bounds and not consistent with the language and intent of the respective authorities. First and foremost, none of these authorities give BLM authority to create the landscape-level protections. These authorities require site-specific management, and language doesnt exist to allow the definition of a site to be expansively delineated to include an arbitrarily defined landscape.	DECI07-Compliance with other laws and policies	Proclamation 10285 requires the agencies to prepare and maintain a management plan for the entire Monument that protects and restores the objects of historic and scientific interest therein. Further, the Proclamation acknowledges that is in the public interest to ensure the preservation, restoration, and protection of the objects of scientific and historic interest on the Bears Ears region, including the entire Monument landscape, reserved within the boundaries of Bears Ears National Monument. See Chapter 1, Relationship to Other Policies and Plans, and Appendix B for compliance with applicable laws and policies.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18990-7	Clif Koontz		Any notion that Lead Agencies have no choice but to stick to an arbitrarily rushed EIS timetable, is contrary to 40 CFR 1501.10(b)(2) and (c), which state: (b)(2) [Agencies shall complete] environmental impact statements within 2 years unless a senior agency official of the lead agency approves a longer period in writing and establishes a new time limit. Two years is measured from the date of the issuance of the notice of intent to the date a record of decision is signed. (c) The senior agency official may consider the following factors in determining time limits: (1) Potential for environmental harm. (2) Size of the proposed action. (3) State of the art of analytic techniques. (4) Degree of public need for the proposed action, including the consequences of delay. (5) Number of persons and agencies affected. (6) Availability of relevant information. (7) Other time limits imposed on the agency by law, regulations, or Executive order. (Emphases added) This regulatory language puts the lie to any claim by Lead Agencies that they are somehow bound to a ROD timeline in time for the 2024 Election. They as senior agency officials are entitled under regulation to lengthen that timeline in consideration of factors which include the following: -The potential for environmental harm. Environmental harm, or effects, as Lead Agencies well know, includes effects to the human socio economic environment. See, e.g., 40 CFR 1508.1(g)(4), which states: Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effects will be beneficial. (Emphasis added.) -The potential for widespread and deep socio economic harm to local constituents and local economies, that may result from this EIS/RMP, are significant. -The size of the proposed action. This factor, given the overwhelming size of the BENM calls for consideration in terms of lengthening the EIS time line. -The degree of public need for the proposed action. It is absurd, the notion that there is a public need to damage the local economies and recreational traditions. The only public need is to slow down and take the time necessary to make sure this matter is studied and vetted thoroughly. -The consequences of delay also weigh in favor of extending the timeline. There is no serious dire consequence that will result from a sizable time extension.	DECI07-Compliance with other laws and policies	The environmental impact statement is consistent with all relevant laws and policies.
3433-1	Mike McHugh, ID		There is virtually no access to wilderness areas by disabled persons. BLM, the Forest Service, Reclamation, and the states do a poor job of making ADA accommodations except at a few paved parking lots. Many pilot organizations fly disabled persons into remote areas to enjoy the experiences otherwise completely unavailable to them.	DECI07-Compliance with other laws and policies	The agencies manage recreation and wilderness in accordance with applicable law and the Rehabilitation Act. Aircraft is not considered a mobility device, and hundreds of miles of roads and trails are also open allowing access in BENM, outside of the wilderness area.
889-16	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We are highly concerned that the management approaches prescribed in the preferred alternative E emphasizing so-called Traditional Indigenous Knowledge violate the Establishment Clause of the First Amendment by expressly endorsing Native American religious beliefs and restricting or prohibiting recreational activities within the monument by non-Indians on the basis of those religious beliefs. As stated in the DEIS: Alternative E maximizes the consideration and use of Tribal perspectives on managing the landscape of BENM. This alternative is meant to emphasize resource protection and the use of Traditional Indigenous Knowledge and perspectives on the stewardship of the Bears Ears landscape. This includes consideration of natural processes and seasonal 10 cycles in the management of BENM and collaboration with Tribal Nations to incorporate those considerations into BENM day-to-day management. Moreover, the DEIS makes it clear that all alternatives are informed by so-called traditional indigenous knowledge: All action alternatives would give consideration to Traditional Indigenous Knowledge in the management of BENM and would include BENM-wide management to provide for the continued preservation not only of the physical landscape but also the cultural and spiritual landscape, including that which is visual and auditory. References in these and other passages to Traditional Indigenous Knowledge are essentially synonymous with native religious beliefs. The reference to preserving the cultural and spiritual landscape makes the endorsement of native religious beliefs explicit, as the agencies are directly indicating their intent to set land management policy based on Native American spiritual beliefs, specifically about visual and auditory aesthetics. The DEIS is replete with references to the Bears Ears landscape as sacred, in accordance with the animistic religious beliefs of the relevant tribes which essentially worship the natural environment as divine. Nowhere is the agencies endorsement of native religious beliefs clearer than the section on soundscapes in the Analysis of Management Situation document published earlier in this planning process, which stated: As identified in Bears Ears Inter-Tribal Coalition: A Collaborative Land Management Plan for the Bears Ears National Monument (BEC 2022), Tribal Nations of the BEITC consider BENM to be a spiritual place and thus value the need for peace and quiet. Hopi people believe that the spirits of their ancestors still reside at BENM, and any disruption of peace will disturb them. After quoting the BEITCs proposed management plan describing the Hopi belief that any disruption of peace and quiet in the monument will disturb the spirits of their ancestors, the agencies then proposed to restrict certain recreational activities – primarily motorized recreation and drone flying – because they allegedly disrupt natural soundscapes. This management approach from the Analysis of Management Situation document was carried forward into alternative E in the DEIS, which includes similar passages. However desirable natural soundscapes may be, native religious beliefs regarding disturbing ancient spirits are not a valid basis for federal policy. Even aside from First Amendment concerns, ancient spirits are not a cognizable part of the human environment that the	DECI07-Compliance with other laws and policies	Traditional Indigenous Knowledge is a body of observations, oral and written knowledge, innovations, practices, and beliefs that promote sustainability and the responsible stewardship of cultural and natural resources through relationships between humans and their landscapes. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			agencies are required to analyze impacts to under NEPA, and are not properly part of a NEPA analysis. The agencies have made it quite clear that they intend to manage Bears Ears National Monument primarily, if not exclusively, for the benefit of native religious practitioners at the expense of all other stakeholders and the American public as a whole. Such blatant favoritism toward members of a certain religion in federal land management policy cannot hope to survive judicial scrutiny under the Establishment Clause of the First Amendment.		
889-26	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	795 F.3d at 966. In order to comply with the APA, when an agency makes a decision that contradicts a past decision, it must display an awareness that it is changing position, and articulate good reasons for the new policy, including a reasoned explanation for disregarding facts and circumstances that underlay or were engendered by the prior policy. If the agencies make any decisions in the new management plan that contradict those in the 2020 management plans, they must provide a reasoned explanation for that difference in the final EIS and ROD. This includes explaining the reasons for individual management actions and closures, not just the reason for the overall alternative chosen. Under APA section 706(2) agency decisions that are unsupported by substantial evidence must be set aside as unlawful. Both NEPA and the APA require the BLM to articulate a rational connection between the facts found and the choice made. In the case of decisions regarding motorized travel designations, this requirement not only applies to the overall decision regarding the alternative adopted, but also to the decisions made regarding individual routes/areas.	DECI07-Compliance with other laws and policies	See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the draft RMP/EIS and for which the EIS is compliant. Plans for implementation level travel planning are included in Appendix H of Volume 2 of the draft RMP/EIS. See Chapter 2 Lands and Realty.
889-37	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Among the most important motorized routes in the Manti-La Sal National Forest section of the Bears Ears National Monument are the Peavine Corridor (NFSR 50089) and Dark Canyon Corridor (NFSR 55378) roads cherry-stemmed into the Dark Canyon Wilderness (collectively referred to as the Peavine Corridor). These two roads were specifically excluded from the Dark Canyon Wilderness as a compromise in the Utah Wilderness Act of 1984. In so doing, Congress specifically rejected the Forest Services recommendation at the time that these roads be closed, instead mandating that they remain open to continued motorized use. We believe this legislation constituted a clear recognition by Congress of the extraordinarily high value opportunities these two roads provide for motorized recreation, as well as the important motorized access they provide to hiking trailheads deep within Dark Canyon. This congressional intent was clearly expressed in a 1988 letter from Senator Jake Garn to George Morris, Forest Supervisor of the Manti-La Sal National Forest, in response to a proposal to close these roads under consideration at that time: Simply stated, in 1984, the five member Utah Congressional delegation together with then Utah Governor Scott Matheson, specifically drew the boundary of the Dark Canyon Wilderness area to leave the Peavine Corridor open. The delegation rejected then, and I continue to reject now, any attempt to close access to this area. When a decision of this nature is made by elected representatives of the people, I believe it is the duty and obligation of the resource managers to comply. Frankly, I question why the issue is being raised at all since it has already been decided by the Congress. I have no objection to the Forest Service monitoring the use of the road, but again, I will oppose any attempt to restrict access or close the Peavine Corridor in Dark Canyon. We are concerned that with the ROS designations included in the draft Bears Ears management plan, the agencies are again attempting to mandate the closure of these extremely important motorized routes in direct contradiction of the clear Congressional intent that the roads in the Peavine Corridor remain open to motorized use in perpetuity.	DECI07-Compliance with other laws and policies	Closing the motorized route in the Peavine corridor is not being proposed in this Plan. The route was "cherry stemmed" within the Dark Canyon Wilderness, but that does not relieve the USDA Forest Service from ensuring that the route does not have impacts on the important riparian resources and BENM objects located within the Peavine Corridor.
889-95	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	And we particularly urge the agencies to ensure that the new management plan does not unconstitutionally favor one particular ethnic or religious group over all others by enshrining native American religious beliefs in federal land management policy.	DECI07-Compliance with other laws and policies	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
889-15	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The overarching principle of alternative E is to take native American religious beliefs (what the DEIS euphemistically calls traditional indigenous knowledge) and turn them into federal policy. Alternative E constitutes nothing less than the wholesale establishment of a state religion (at least for the purposes of this monument) in abject violation of the First Amendment.	DECI07-Compliance with other laws and policies, ALT05-Alternative E	The Proposed Plan is consistent with applicable laws and regulations.
16784-13	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Because paleontological resources may occur in different settings including with different slope gradients, SVP prefers alternatives where soil disturbance is avoided but not prohibited, allowing flexibility to conduct carefully managed surface disturbance activities, such as paleontological excavations. Therefore, SVP prefers inserting a management provision that contains the clause No discretionary actions would be allowed or No surface-disturbing activities would be allowed for any slope gradient as long as it accompanies the clause unless necessary to protect BENM objects, where objects would include scientifically significant paleontological resources that may be removed from such sites on a case-by-case basis for their protection and preservation. SVP asks that any decision-making should be made in consultation with the agency's qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	DECI07-Compliance with other laws and policies, ALT05-Alternative E, PALEOGE003-Paleo	The agencies considered the commentor's suggested change. In Chapter 2, Soil Resources, Management Action By Alternative, of the Proposed Plan, no surface-disturbing discretionary actions would be allowed on slopes greater than 30 percent, unless necessary to protect BENM objects. Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources. The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
16784-16	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	If and when the management of paleontological resources overlaps with resource use, trained and qualified paleontologists should be consulted so that the significance of tribal cultural heritage can be further enhanced also to encompass scientific significance, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	DECI07-Compliance with other laws and policies, ALT05-Alternative E, PALEOGE003-Paleo	Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.
17630-1	Brent Tanner		In reviewing the documents, we have concerns that the preferred alternative will further restrict and reduce livestock grazing in the BENM. Livestock grazing is a permitted, historically significant and important economic contributor to the local communities and economy in the surrounding region. The BENM area has a long and important history of livestock grazing in the area, starting with the Native American tribes who have grazed livestock on those lands for decades and followed later by Anglo settlers who have grazed livestock creating an important economic and cultural identity for that region. Those caretakers of the land have sustainably utilized the lands, not only for their livelihoods, but to sustain the culture and recreational opportunities that are also permitted multiple uses of the lands. San Juan County and the State of Utah have been proactive in establishing long term land use management plans that are in the interest of the land, local communities, local economies and visitors to the area. We express concern that the proposed plan does not cooperate with the established planning of local government officials and the desires of the State of Utah. The proposed plan could jeopardize the local economies and damage the viability of local communities. It is our belief that the BLM and USFS are under obligation to coordinate with local governments as outlined in county and state resource management plans, the National Environmental Policy Act, Federal Land Policy Management Act and the National Forest Management Act.	DECI07-Compliance with other laws and policies, ALT05-Alternative E	Appendix O: Consultation and Coordination, outlines the stakeholders involved in development of the RMP/EIS. including local and State government.
18556-3	Stan		It is illegal discrimination for the BLM to treat public input differently based on race, ethnicity, or national origin, yet that is exactly what the BLM is doing in the preferred alternative with the input from the tribes being held in higher regard than that from non-tribal members of the public.	DECI07-Compliance with other laws and policies, ALT05-Alternative E	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. Additionally, Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process.
18657-48	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	We recognize that RS 2477 claims cannot be adjudicated through an administrative process, but we also recognize that closing R.S. 2477 routes through an administrative process will bias any future adjudication, and closures of these routes should be avoided at all costs until any contested route can be thoroughly adjudicated. At minimum, BLM should develop an alternative that keeps all of these routes open.	DECI07-Compliance with other laws and policies, ALT06-Proposed, NEW	Under Alternative A, 685,403 acres of BLM-administered land would be designated as OHV limited, including WSAs, certain ACECs, and portions of certain SRMAs (see Travel and Transportation section of Chapter 2) This alternative contains RS 2477 claimed routes that were designated as OHV closed in the 2008 RMP. As such, the BLM considered an alternative that would provide the agencies with the ability to designate all current routes designated as OHV open as available for public use through a subsequent decision making process. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
18657-9	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Elimination of a Recreation Emphasis alternative constitutes an explicit violation of the requirements of NEPA analysis in multiple ways: Agencies shall rigorously explore and objectively evaluate all reasonable alternatives Alternatives analysis is both independent of, and broader than, the EIS requirement The entire range of alternatives presented to the public must encompass those to be considered by the ultimate agency decisionmaker In defining the project limits the agency must evaluate alternative means to accomplish the general goal of an action and cannot rig the purpose and need section of a NEPA process to limit the range of alternatives An agency must perform a reasonably thorough analysis of the alternatives before it; the rule of reason guides both the choice of alternatives as well as the extent to which an agency must discuss each alternative The discussion of alternatives must go beyond mere assertions if it is to fulfill its vital role of exposing the reasoning and data of the agency proposing the action to scrutiny by the public and by other branches of the government UPLA contests the absence of a Recreation Emphasis alternative based on the legal precedent that a NEPA analysis is invalidated by the existence of a viable but unexamined alternative. We subsequently assert the exigence that the RMP planning team must retract the proposed RMP in	DECI07-Compliance with other laws and policies, ALT06-Proposed, NEW	The Chapter 1 Purpose and Need section of the Draft RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape" (page 1-4). Recreation is acknowledged as an important use within the Monument; however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Chapter 2, Alternatives Considered but Not Analyzed in Detail.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			order to revise the RMP to include a robust, fair, and complete analysis of a Recreation Emphasis alternative.		
889-22	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network. Travel management policies focused on minimizing the environmental impacts of motorized recreation have resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years which has disproportionately impacted people with disabilities. Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other human powered and quiet use forms of recreation in which many people with disabilities are unable to participate. Every time motorized routes are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else. As a result, the BLM has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans. The BLM is therefore required by this executive order and others mandating that federal agencies consider environmental justice in NEPA proceedings to consider whether any route closures would disproportionately harm disabled users ability to access public lands.	DECI07-Compliance with other laws and policies, ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The BLM added additional information to Chapter 3, Environmental Justice and Social and Economic Values, to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment. The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws. Specific decisions regarding motorized use on roads and trails will be made in the implementation level travel plan.
15323-9	Bill McGlynn 1711 W College St Bozeman, MT 59715	Recreational Aviation Foundation	Recognizing the pre-existing authorization for recreational use of remote airstrips would require them to meet the Proclamation 9558 standard of motorized and non-motorized mechanized vehicle use shall be allowed only on roads and trails designated for such use, consistent with the care and management of such objects. This contrasts with the requirement for additional road or trails designated for motorized vehicle use must be for the purposes of public safety or protection of such objects. This Draft RMP/EIS is BLMs next opportunity to fulfill its promise made in 2008 to properly delineate travel management areas for remote airstrips. Recreational aviation stakeholders have waited patiently and interacted openly and honestly with BLM Monticello Field Office since that time to gain clear authorization to use those backcountry airstrips that are now within the borders of Bears Ears National Monumnent. Unfortunately, we see in this Draft RMP/EIS a process to move forward with authorization that requires, unnecessarily, that we meet new, stricter, essentially impossible, criteria for gaining that authorization. As presented in this Draft RMP/EIS, the goal posts have been moved an impossible distance, with an apparent predecision to prevent recreational use of those existing airstrips.	DECI07-Compliance with other laws and policies, ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and the Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Impacts of aircraft on the natural environment are discussed in Backcountry airstrip use and impacts are discussed in several sections of Chapter 3 of the RMP/EIS including Travel, Transportation and Access Management; Wilderness Study Areas; Natural Soundscapes; and Cultural Resource Management, Indigenous Peoples' Religious Concerns, and Tribal Use .
18657-32	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The fact that the agencies have signed a co-management agreement with the BEITC and the RMP declares their intent to manage the monument according to Traditional Indigenous Knowledge – a thinly veiled code word for native religious beliefs – clearly results in an excessive government entanglement with religion. It a preposterous assertion within the view of common sense as well as legal precedent and clear Constitutional boundaries to claim that allowing practitioners of a specific religion to write federal policy based solely on their religious beliefs does not result in excessive entanglement with religion. The RMP indicates a clear and undeniable intent by the agencies to manage BENM in a way which endorses and favors native American religious beliefs over all competing interests and views regarding how this landscape should be managed. While the agencies would almost certainly never consider signing a cooperative management agreement with the Church of Latter Day Saints, or churches of any Christian denomination, and subsequently state that a national monument would be managed in accordance with traditional Mormon or Christian beliefs, the BLM and Forest Service are doing precisely the equivalent through their proposed adoption of all alternatives within the RMP, and acutely so within Alternative E.	DECI07-Compliance with other laws and policies, CUL02-Traditional, Religious, or Cultural Use	Traditional Indigenous Knowledge is a body of observations, oral and written knowledge, innovations, practices, and beliefs that promote sustainability and the responsible stewardship of cultural and natural resources through relationships between humans and their landscapes. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
18923-4			In Appendix L of Volume 2, The Bears Ears Inter-Tribal Coalition: A Collaborative Land Management Plan, the tribes fail to provide a more concrete definition of indigenous knowledge and instead furthers the argument that it is an inappropriate tool to incorporate into decision-making on federally owned lands because of its inherently religious nature. The description of the term provided by the Intertribal Coalition in Appendix L. of Volume 2 is tied to that provided by the National Congress of American Indians in their Resolution REN-13-035 which starts by saying that indigenous knowledge is concerned with spiritual systems. Most alarmingly, the draft RMP and Appendix L. seem to silently acknowledge the truth of this very argument in advocating for planning to acquire federal funds to conduct studies to better understand their own knowledge. Such an order of events would be appropriately considered an act of putting the cart before the horse.	DECI07-Compliance with other laws and policies, DECI01-Decision Process	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18965-2	Simone Griffin	BlueRibbon Coalition	The socioeconomic analysis should acknowledge the direct financial impact that will occur to organizations like ours if the agency were to adopt a conservation alternative. The Administrative Procedures Act is important to a planning process such as the development of this plan, because this statute makes it clear that agency actions that are both contrary to the constitutional right, power, privilege, or immunity; or in excess of statutory jurisdiction, authority, or limitations, or short of statutory right must be held unlawful. The plan should acknowledge these important statutory and constitutional provisions.	DECI07-Compliance with other laws and policies, EJSOC01-General	The Proposed Plan is consistent with applicable laws and regulations.
18965-3	Simone Griffin	BlueRibbon Coalition	We recommend that the BLM and USFS use this planning process to finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities. In April 2022 the Department of Interior released its Equity Action Plan which states, Public land visitation data collected from the Departments bureaus suggests that certain underserved communities are underrepresented as public land visitors, relative to their presence in the U.S. population at large. This includes persons with disabilities and limited physical access. On his first day in office, President Joe Biden issued an Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. This executive order established an ambitious whole-of-government equity agenda which focuses on addressing entrenched disparities in our laws and public policies, and mandates a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Under this executive order, The term equity means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities.... Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.	DECI07-Compliance with other laws and policies, EJSOC01-General, TRAVEL01-General	The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws.
18657-68	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Any approach to travel management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized routes on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. Alternatives B, C, D, and E restrict or eliminate OHV access into many extremely scenic and wild areas, which would subsequently require lengthy hikes to visit. It is inevitable that such closures would disproportionately impact people with disabilities, who would now have no practical way to visit these areas. Where before they could easily visit these places in a Jeep or side-by-side, not even the most robust electric wheelchair is capable of driving a 10 mile long closed Jeep trail even if it were allowed to. Because of the extreme number of closures contemplated in the alternatives presented in the RMP, the result is unavoidable disproportionate impacts on people with disabilities, which violates EO 13085 and contravenes the DOI Equity Action Plan	DECI07-Compliance with other laws and policies, EJSOC02-EJ Populations	Additional information was added to the Environmental Justice and Social and Economic Values section of Chapter 3 to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment. The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws.
18657-70	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Many of UPLAs members and supporters are made up of individuals that are elderly, handicapped in some way, or suffer from physical mobility challenges, and cannot access public lands because of their limitations without the benefit of motorized vehicles. You must include compliance with Executive Orders 13985 and 14035 on Advancing Racial Equity and Support in your list of regulations and laws that the RMP must address, and address how you achieve compliance with proposed limits or closures in the Draft EIS.	DECI07-Compliance with other laws and policies, EJSOC02-EJ Populations	The BLM added additional information to Chapter 3, Environmental Justice and Social and Economic Values, to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment. The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws.
14767-178	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Construction of structures to support livestock grazing (e.g., stock ponds, dams, roads) would increase surface disturbance and could impact paleontological resources. Management decisions related to grazing may also impact paleontological resources. PFYC Class 4 and 5 areas are often areas of exposed bedrock that contain minimal forage or are located on steep slopes and are therefore often unappealing for livestock grazing; however, in PFYC Class 4 and 5 areas that do not have these characteristics, livestock grazing can reduce vegetation within an area and could cause increased erosion of the soil and exposure of paleontological resources underlying the area. Livestock also could trample and destroy any paleontological resources if these resources are present at or near the surface. Management decisions that reduce acreage open to livestock grazing would likely result in reduced impacts to paleontological resources. So we find the BLM openly admitting that their authorized actions with degrade and destroy objects they are mandated to protect and restore. This again demonstrates that BLM is applying their usual multiple use framework, to lands that are exempted by statute from that framework and have failed to comply with their NLCS directives.	DECI07-Compliance with other laws and policies, GRAZ01-General	Whenever a range improvement project is proposed, paleontological resources would be evaluated through site specific environmental analysis. Under the Proposed Plan, a paleontological resources survey is also required depending on the extent of the disturbance in PFYC 3-5 and unknown. Under the Proposed Plan, the table titled "Alternatives for Livestock Grazing" states that the agencies would: prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and (on BLM-administered lands only) unless a current (within the last 10 years) land health assessment has been completed, and, if needed, a causal factor determination has been made for the allotment or applicable watershed. As informed by the land health assessment and causal factor determination, the new/modified water development would support the achievement of the BLM Utah Rangeland Health Standards . An exception to this requirement could be approved for new/modifications to water developments to prevent imminent damage to BENM objects. Language in Chapter 3 Paleontological Resources and Geology was updated in regard to livestock impacts and paleontological resources.
14767-138	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The next misleading statement: Under several alternatives, land health assessments and/or causal factor determinations would be completed in certain areas within given time frames and may be used to inform livestock grazing permit renewals. Where a categorical exclusion cannot be used to fully process a grazing permit, a no grazing alternative would be considered for in the NEPA document	DECI07-Compliance with other laws and policies, GRAZ01-General	The Proposed Plan in Chapter 2, Livestock Grazing, outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan also includes prioritizing 7 allotments for the completion of rangeland health assessments within 3 years and NEPA within 6 years

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			consistent with BLM Instruction Memorandum 2012-169. This fails to admit to the BLMs addition to FLPMA 402c2 where permits are renewed decade after decade with no NEPA.		of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals.
14767-211	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.5.9.1: A direct competition for forage and water resources is found throughout the Monument between livestock and wildlife but is most prevalent in the riparian areas, where water and forage are present or of higher quality than in uplands. This competition admitted to by the BLM degrades, not protects and restores, the object of wildlife.	DECI07-Compliance with other laws and policies, GRAZ01-General	As outlined in Chapter 2 Water Resource, Goals and Objectives, agencies will protect and restore water resources, including riparian areas, wetlands, springs, and seeps. This section states that riparian and wetland resources would be managed for PFC; and that water resources would be managed for quality and quantity.
14767-79	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	8.6.8.2.2 Structures for Agricultural Grazing Appropriate structures may be approved by the National Park Service and may be allowed in parks when the structures are consistent with a livestock management plan or another appropriate management plan; are consistent with park purposes and other applicable laws, regulations, or policies; and will not cause unacceptable impacts on park resources and values. 4.6.2 Park surface waters or groundwater will be withdrawn for consumptive use only when such withdrawal is absolutely necessary for the use and management of the park. Current livestock grazing does not comply with Section 4.6.2.	DECI07-Compliance with other laws and policies, GRAZ01-General	This comment cites NPS regulations for grazing activity, which do not apply to BLM-managed lands or USDA Forest Service-managed lands.
17573-52	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The no-net-loss of AUMs provisions cited in the States prior scoping comments (and cited prior in the current letter) remains the States position. However, as of March 14, 2023, the State has adopted amendments and updates to the Utah State Resource Management Plan, including updates to its position on the no-net-loss of AUMs. Specifically, the updated Utah SRMP states on page 16, Grazing allotment animal-unit months (AUMs) within the state should remain at or above current levels unless a scientific need for temporary reduction is demonstrated to the satisfaction of State of Utah officials. 44 In the case that AUMs are temporarily reduced, these reductions shall be reinstated at the earliest possible moment once vegetative health has been restored to its previous levels.45 The updated SRMP further states on Page 105 that the State will: [a]dopt a stance of not only no-net-loss with regard to grazing AUMs/HMs on federal lands, but also a stance that supports expeditious return of all permitted AUMs/HMs to active status at the earliest opportunity. Active AUMs/HMs within the state must remain at or above current levels unless a scientific need for temporary reduction is demonstrated to the satisfaction of state officials. The government must employ strategic and targeted annual rangeland health evaluations as a tool for returning all permitted AUMs to active status as range conditions improve. In the case that AUMs/HMs are temporarily reduced, these reductions are reinstated at the earliest possible moment once vegetation health has been restored to its previous levels (emphasis added).46 With these updated Utah SRMP policies in mind, the State would express its overarching concern regarding the Livestock Grazing Matrices in the BENM Draft RMP-EIS that allows for ANY permanent net loss of AUMs on the BENM and assert that such a permanent net loss is a violation of State law.	DECI07-Compliance with other laws and policies, GRAZ01-General	The Proposed Plan would not alter currently allocated AUMs as outlined in Chapter 2, Livestock Grazing. Modifications to AUMs would be done at the site-specific implementation level planning process. Potential inconsistencies between the State Plan and the Proposed Plan are addressed in Appendix S.
17573-54	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	If the BLM/USFS is proposing to make unavailable entire allotments and/or pastures, this would by implication reduce the overall number of available AUMs for a particular allotment. Further, if the BLM/USFS is reducing AUMs in this manner, it violates Utah Code, and the Utah SRMP which dictates that active AUMs/HMs within the state must remain at or above current levels unless a scientific need for temporary reduction is demonstrated to the satisfaction of state officials. 47 Here, the BLM and the /USFS have not demonstrated a scientific need for reducing the AUMs on the BENM by making multiple pastures/allotments unavailable. With no scientific need demonstrated to the satisfaction of state officials, the State asserts that making vast areas unavailable for grazing violates its no-net-loss of AUMs policy.	DECI07-Compliance with other laws and policies, GRAZ01-General	The Proposed Plan would not alter currently allocated AUMs as outlined in Chapter 2, Livestock Grazing. Modifications to AUMs would be done at the site-specific implementation level planning process.
9100-1	David Robinson		As the plan is now written, livestock grazing as a traditional cultural practice and livestock allotments-used now and in the past-are NOT protected by proclamation 10285. The draft has failed to take into account the national historic preservation act of 1966(NHPA) The draft has failed to take into account the NHPA'S implementing regulations at 36 C.F.R. 800 part B also know at the section of the 106 process.	DECI07-Compliance with other laws and policies, GRAZ01-General	While livestock grazing is a use noted in the Proclamation, it is not itself an object.. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources Section in Chapter 2.
17573-63	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	To engender further frustration among non-Indigenous people, the draft EIS/RMP fails to acknowledge how livestock grazing specifically, and the lands upon which this culturally significant practice is conducted must be considered under existing laws, regulations, and policies. The agencies are obligated to comply with 54 U.S.C. 306108 by following the Section 106 Process (36 C.F.R. 800 Subpart B) using agency guidance. PLPCO, as a consulting party to this undertaking, previously asserted its knowledge of, and concerns with, the traditional cultural and economic practice of grazing in the BENM.55 Specifically, our office argued that the practice of livestock grazing on allotments within the monument comprises a Traditional Cultural Property (TCP) that is eligible for National Register inclusion because of its association with cultural practices [and] beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community.56 This TCP is significant, minimally, because it maintains aspects of integrity that are critical to conveying significance, especially location, setting, feeling,57 and is associated with events that have made a significant contribution to the broad patterns of [local] history.58 Further research may reveal that the TCP is associated with the lives of persons significant in the past59 and possesses aspects of design, materials, and workmanship.	DECI07-Compliance with other laws and policies, HIST001-General, GRAZ01-General	The State has failed to provide the agencies with sufficient information to begin evaluating lands used for livestock grazing as a TCP. The State has provided no delineated tangible area or property to be evaluated as a TCP. Accordingly, the agencies are not able to evaluate livestock grazing as a TCP in accordance with Section 106 at this time. Further, the State's comments make references to multiple groups but does not identify a single community or group that are associated with, and value the traditional practice of grazing (see National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties). However, even if the State had provided sufficient information to begin evaluating lands for livestock grazing as a TCP, the Proposed Plan would allow for continued livestock grazing practices but at a reduced capacity by making areas unavailable to grazing; approximately 97% acres of grazing currently available for grazing would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.

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889-60	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The Wilderness Act makes it quite clear that new Wilderness areas are supposed to be designated by Congress, not created by administrative agencies. Indeed, the creation of new de facto Wilderness areas by administrative agencies was precisely what the Wilderness Act was intended to prevent. As the U.S. District Court for the District of Wyoming explained in State of Wyoming v. United States Department of Agriculture, No. 01-CV-86-B, at *1 (D. Wyo. July 14, 2003): The Wilderness Act declared it the policy of Congress to "secure for the American people of present and future generations the benefits of an enduring resource of wilderness." 16 U.S.C. 1131 (a). To effectuate this policy, Congress established the National Wilderness Preservation System ("NWPS"), which would be composed of congressionally designated "wilderness areas." Id. The Wilderness Act also immediately designated certain areas as wilderness, Id. 1132(a), and provided the procedure for future designation of wilderness areas, id. 1132(b). In establishing the NWPS, Congress unambiguously provided that "no Federal lands shall be designated as `wilderness areas' except as provided for in [the Wilderness Act] or by a subsequent Act." Id. 1131(a). Therefore, Congress has the sole power to create and set aside federally designated wilderness areas pursuant to the Wilderness Act. Parker v. United States, 309 F. Supp. 593, 597 (D. Colo. 1970), aff'd, 448 F.2d 793 (10th Cir. 1971). In fact, the primary purpose of the Wilderness Act was to provide: [a] statutory framework for the preservation of wilderness [that] would permit long-range planning and assure that no further administrator could arbitrarily or capriciously either abolish wilderness areas that should be retained or make wholesale designations of additional areas in which use would be limited. Id. (quoting H.R. Rep. No. 88-1538). To this end, the Wilderness Act removed the Secretary of Agriculture's and the Forest Service's discretion to establish de facto administrative wilderness areas, a practice the executive branch had engaged in for over forty years. Parker,309 F. Supp. at 597, aff'd,448 F.2d at 797. Instead, the Wilderness Act places the ultimate responsibility for wilderness designation on Congress. Id.16 U.S.C. 1131 (a). In this regard, the Wilderness Act functions as a "proceed slowly order" until Congress through the democratic process rather than by administrative fiat can strike the proper balance between multiple uses and preservation. Parker,448 F.2d at 795. This statutory framework necessarily acts as a limitation on agency action. Id. at 797. While the BLM and Forest Service may manage areas to preserve existing wilderness character, it would be inappropriate and contrary to the Wilderness Act to use lands with wilderness characteristics status to effectively create large de facto wilderness areas where Congress has not chosen to do so.	DECI07-Compliance with other laws and policies, LWC01-General	Only Congress can designate a wilderness area, however both the National Forest Management Act (NFMA) and Federal Land Management Act (FLPMA) directs the agencies to prepare land management plans, including inventories of the wilderness characteristics, if any on those lands. Through the public planning process the agencies may choose to manage areas to protect their wilderness characteristics. Per BLM Manual 6320, the BLM will evaluate lands with wilderness characteristics through the land use planning process. When such lands are present, the BLM will examine options for managing these lands and determine the most appropriate land use allocations for them. Considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) allowing for other multiple uses in an area while not protecting wilderness characteristics; (2) Minimizing impacts to wilderness characteristics via management restrictions (e.g., terms and conditions of use or stipulations) while emphasizing other multiple uses; or (3) Protecting wilderness characteristics while providing for compatible multiple uses. The BLM may choose any one of these outcomes, or some combination thereof, for a parcel of land possessing wilderness characteristics, provided that the land use plan documents the basis for this determination.
916-6	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	The agency should adequately consider that any conversion of lands designated by congress for multiple-use to defacto wilderness lands circumvents congressional laws regarding multiple use and the wilderness designation process. [see letter for further details and rationale]	DECI07-Compliance with other laws and policies, LWC01-General	The range of alternatives analyzed in the Draft RMP/EIS includes alternatives that would manage some or all lands with wilderness characteristics units in BENM to protect wilderness characteristics (see Section Lands with Wilderness Characteristics (applies to BLM-administered lands only) in Chapter 2 of the Draft RMP/EIS). Determining management of lands with wilderness characteristics through the land use planning process may result in several outcomes, including (1) allowing for other multiple uses in an area while not protecting wilderness characteristics; (2) Minimize impacts to wilderness characteristics via management restrictions (e.g., terms and conditions of use or stipulations) while emphasizing other multiple uses; or (3) Protecting wilderness characteristics while providing for compatible multiple uses (BLM Manual 6320).
16784-5	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	It is critical to stress that collection and curation (under sections 6304 and 6305 of PRPA) are the only way to preserve the most scientifically significant fossils. 43 CFR Part 49 49.30 and 36 CFR Part 291 291.1 obligate the BLM and USFS to preserve, manage, and protect paleontological resources on and from Federal land using scientific principles and expertise, and to coordinate these activities with the scientific community.	DECI07-Compliance with other laws and policies, PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Proposed Plan in Section Paleontological Resources of Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16784-6	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Vol 1 of the RMP states, requiring methods to separate the public from paleontological resources. Paleontologists are the public" with regard to U.S. law. Keeping paleontologists separate from paleontological resources would not be consistent with PRPA or the proclamation, nor would it be consistent with the duty to manage these resources using scientific principles. 43 CFR Part 49 49.120 and 36 CFR Part 291 291.13 indicate that permitted fossil collection should be approved when it furthers "paleontological knowledge, public education, or management of paleontological resources", and would be "consistent with the purpose and management objectives defined for the Federal land." Given that the proclamations designating BENM specify preservation and scientific study of paleontological resources, allowing permitted collection of scientifically significant fossils is the only alternative consistent with these presidential proclamations and DOI regulations (i.e., 43 CRF Part 49).	DECI07-Compliance with other laws and policies, PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Proposed Plan in Section Paleontological Resources of Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The statement on barriers or other methods has been updated to emphasize protection of paleontological resources from impacts, not separation from the public.

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16784-18	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Although SVP supports the requirements to maintain healthy air resources, issues concerning air resources are largely irrelevant from the paleontological standpoint. The only possible exception may be situations that would involve surface disturbances, including excavation of scientifically significant paleontological resources at or near ground surfaces (if any). If any questions arise from such occasions, relevant agency personnel should consult with the agency's qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	DECI07-Compliance with other laws and policies, PALEOGE003-Paleo, AIRO1-General	Under the Proposed Plan in Section Paleontological Resources of Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
7928-1	Trent Herring 61 W 800 N Blanding, 84511		The Plain Writing Act of 2010 requires federal agencies to write clear government communication that the public can understand and use. This plan is very confusing to the General Public that does not work in this field on a day to day basis. In a meeting in Blanding on May 9, 2024, the questions were asked about why the way this plan was written was so complicated to understand. The answer from the panel that attended was pretty much that it is written by the government and that is just the way the government does things. Does The Plain Writing Act of 2010 not come into play to allow the public to better understand this plan?	DECI07-Compliance with other laws and policies, PUBL01-Public and Stakeholder Involvement	The agencies developed this Proposed Plan to comply with applicable regulations, including NEPA's requirement that plain language be used to the extent possible (40 CFR 6.203). An executive summary was included which provides a condensed summary of the larger document. Additionally, a complete list of abbreviations used in the document was provided in Volume 1, and a glossary was provided in Volume 2.
17573-21	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	While the exact status and nature of the BEC is unclear, and although the BEC members may qualify as CAs according to CEQ requirements, it is evident from the RMP/EIS as well as in practice that the BEC is separate and distinct from Cooperating Agencies. CAs are not typically treated as advisory committees under the purview of the Federal Advisory Committee Act (FACA, 5 U.S.C. App.). However, based on the level of advisory deference and involvement of the BEC in the RMP/EIS process, it is evident that the BEC is subject to FACA requirements. However, the weekly and biweekly BEC meetings have not been open to the public, have not been recorded, and have completely failed to comply with FACA. Therefore, in the agencies' zeal to ignore federal law to comply with Administrative Directives and Executive Orders, they have completely failed to conform with FACA.	DECI07-Compliance with other laws and policies, PUBL02-Bears Ears Commission	The BEC was "established to provide guidance and recommendations on the development and implementation of management plans and on management of the monument." The Proclamation establishing the BEC, requires that the commission consist of one elected officer each from the Hopi Nation, Navajo Nation, Ute Mountain Ute Tribe, Ute Indian Tribe of the Uintah Ouray, and Zuni Tribe, designated by the officers' respective tribes. Further, the proclamation provides that the BEC, "may adopt such procedures as it deems necessary to govern its activities, so that it may effectively partner with the Federal agencies by making continuing contributions to inform decisions regarding the management of the Monument. Unfunded Mandates Reform Act of 1995 (UMRA) provides an exemption to FACA that allows federal officials to speak with their state, local and tribal counterparts without implicating the FACA as long as a two-part test is met (2 U.S.C. §154(b)). The test includes meetings being held exclusively between federal officials and "elected officers of state, local, and tribal governments (or their designated employees acting on their behalf) in official capacities" and meetings for the purpose of exchanging views, information, or advice "relating to the management or implementation of federal programs pursuant to statute, that explicitly or inherently share intergovernmental responsibilities or administration." Consistent with the direction in the Proclamation 9558 and the UMRA exception of the FACA, the BEC is made up of elected officers of each of the five Tribal Nations. All meetings hosted by the BLM and USDA Forest Service have complied with FACA and NEPA.
17573-22	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Finally, it is readily apparent throughout the RMP/EIS that, regardless of the alternative ultimately selected, the Agencies fully intend on providing themselves with enough leeway in the final plan to receive management direction from the BEC for major and minor aspects of the implementation and modifications of this plan moving into the future. The extent to which the RMP/EIS shows the intent of the Agencies to defer management decisions to the BEC is concerning. The Antiquities Act does not give the Executive Branch the authority to delegate management or decision-making authority to anyone. Congress alone has that authority and they have not done so.	DECI07-Compliance with other laws and policies, PUBL02-Bears Ears Commission	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision-making authority for federal lands.
18112-12	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	An overarching theme peppered throughout the Draft Plan is the reinstatement of the Bears Ears Coalition (BEC). Per Presidential Proclamation 10285, tribal consultation/cooperation in conjunction with all land activities was to be a core reason for the re-expansion of the monument itself. However, the plan gives no detailed structure or any explanation as to what authority the BEC is to keep in any of the decision-making processes. It merely reiterates coordination, cooperation, organization, and providing opportunities that are detailed within the interagency cooperative agreement between the Tribes and the DOI. It is vague, at best, whether the BEC will have ultimate authority as to what can and cannot happen within the Plan area or if the Bureau will keep the ultimate decision-making authority. And this is particularly troubling for municipal entities like Blanding City, which are left in authority limbo when simply trying to protect and support their constituents. The Bureau's preference for Alternative E due to its maximization of Tribal coordination efforts might or might not be laudable; but as presented, it is unreasonable due to the lack of detail on the BECs' authority, role, etc. What is clear in the proposed revisions to the Plan is that the Bureau is pursuing an aggressively anti-use agenda that it will impose on all stakeholders except for Tribal stakeholders. That is not a lawful or reasonable approach to managing public lands. See 5 U.S.C. 706.	DECI07-Compliance with other laws and policies, PUBL02-Bears Ears Commission	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision-making authority for federal lands.
17573-26	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	There are also inconsistencies between RMP/EIS Section 4.3 and 4.6. Only the Hopi Tribe, Pueblo of Acoma, and the Ute Mountain Ute Tribe (White Mesa Community) responded to the invitation to participate in the plan as a Cooperating Agency. Of those three, only the Hopi Tribe chose to participate in the planning process as a Cooperating Agency. However, Section 4.6 indicates that in addition to BEC members assisting in the preparation of the RMP/EIS, there are ten members of the Pueblo of Zuni, one member of the Ute Indian Tribe, one member of the Ute Mountain Tribe and eight members of the Navajo Nation who participated in the preparation while not being associated with the BEC or with a Cooperating Agency. This is inconsistent with the BENM Proclamation and the NEPA implementing regulations and necessitates additional review before public comment is appropriate.	DECI07-Compliance with other laws and policies, PUBL04-Cooperating Agencies	The BEC was "established to provide guidance and recommendations on the development and implementation of management plans and on management of the monument." The Proclamation establishing the BEC, requires that the commission consist of one elected officer each from the Hopi Nation, Navajo Nation, Ute Mountain Ute Tribe, Ute Indian Tribe of the Uintah Ouray, and Zuni Tribe, designated by the officers' respective tribes. Further, the proclamation provides that the BEC, "may adopt such procedures as it deems necessary to govern its activities, so that it may effectively partner with the Federal agencies by making continuing contributions to inform decisions regarding the management of the Monument. The Unfunded Mandates Reform Act of 1995 (UMRA) provides an exemption to FACA that allows federal officials to speak with their state, local and tribal counterparts without implicating the FACA as long as a two-part test is met (2 USC 154(b)). The test includes meetings being held exclusively

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					between federal officials and "elected officers of state, local, and tribal governments (or their designated employees acting on their behalf) in official capacities" and meetings for the purposed of exchanging views, information, or advice "relating to the management or implementation of federal programs pursuant to statute, that explicitly or inherently share intergovernmental responsibilities or administration." All meetings hosted by the BLM and USDA Forest Service have complied with FACA and NEPA.
17573-6	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State unequivocally proclaims that this RMP/EIS has not been created through meaningful cooperation with CAs and that the agencies have not taken any measures to ensure any level of consistency with the State Resource Management Plant (SRMP) or the San Juan County Resource Management Plan (SJCRMP). This is a violation of FLPMA and will only be remedied through reconsideration of this plan or litigation.	DECI07-Compliance with other laws and policies, PUBL04-Cooperating Agencies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. Appendix B of the RMP/EIS states the plans that were considered for consistency during development of the RMP/EIS. The agencies strived to make the Proposed Plan as consistent as possible with these plans. See the Inconsistency Appendix, Appendix S for a summary of where the BLM/USDA Forest Service and Cooperator disagree on substantive elements of the RMP/EIS.
18990-1	Clif Koontz		The Lead Agencies have failed to to give State, and local governments and the public, adequate notice and opportunity to comment upon and participate in the formulation of plans and programs relating to the management of the public lands. FLPMA Section 202(f), 43 U.S.C. 1712(f) (Emphasis added). The State of Utah and San Juan County (the State, the County, and/or the State and County Cooperators), much less the public of which the Organizations are a part, have been allowed no meaningful opportunity to participate in the formulation of the DRMP/EIS. The dictionary defines formulation as the act or process of formulating. The dictionary definition of formulate is to devise or develop. The dictionary definition of devise is to contrive, plan, or elaborate; invent from existing principles or ideas. The dictionary definition of develop is to bring into being or activity; generate; evolve. In light of these well understood definitions, in no meaningful way have the State, the County, and the Organizations been allowed to participate in the formulation of the elements of the DRMP/EIS. Despite numerous requests for the opportunity to participate in the formulation of the subject document, the most that can be said is that the State, the County, and the Organizations have been asked to comment, after the fact, on various documents produced by Lead Agencies along the way, documents which the Lead Agencies alone have formulated - with perhaps a little help from the so-called Bears Ears Inter-Tribal Coalition, whose members are mostly out of state or out of local area, thus making a mockery of the traditional planning area-based coordination, cooperating agency, and planning processes dictated by Lead Agencies Organic Acts, NEPA, and their associated regulations. In short, the DRMP/EIS simply is not something that the State and County Cooperators and Organizations can say they have helped to formulate. This stands as an irremediable violation of FLPMA 202(f). Accordingly the BENM DRMP/EIS process to date should be scrapped, re-noticed and the Lead Agencies should start over and this time comply with FLPMA 202(f).	DECI07-Compliance with other laws and policies, PUBL04-Cooperating Agencies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities provided throughout the planning process. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies coordinated with cooperating agencies, including the State of Utah, in regard to recreational shooting and adjusted the range of alternatives based on input received. The agencies added in "the State of Utah" throughout the plan for further coordination on implementation of the RMP.
18990-6	Clif Koontz		In violation of 40 CFR 1501.7(i), the Lead Agencies, instead of developing an EIS schedule in consultation with cooperating agencies, have one-sidedly and dictatorially forced an unreasonably accelerated EIS timeline and schedule, despite repeated requests for a lengthened EIS timeline. Adding insult to injury, the Lead Agencies have dictated this accelerated schedule all while failing and refusing to provide State and County Cooperators with critical information about objects to be protected on the National Monument, thus depriving the State and County Cooperators of their ability to meaningfully function as coordinating partners and cooperators.	DECI07-Compliance with other laws and policies, PUBL04-Cooperating Agencies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies coordinated with cooperating agencies, including the State of Utah, in regard to recreational shooting and adjusted the range of alternatives based on input received. The agencies added in the State of Utah throughout the plan for further coordination on implementation of the RMP. Presidential Proclamation 10285 discusses resources located within BENM, with which many, but not all, constitute objects of historic and scientific interest. The agencies are preparing the RMP/EIS consistent with the protection of those resources, including the objects of historic and scientific interest.
18657-5	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Headwaters Economics performs research to assess the economic performance of local communities adjacent to national monuments in the West, which includes assessment of public access and permitted uses of public lands within national monuments. A study of permitted uses in 17 Western national monuments ¹² demonstrates precedent for definitions by which recreational and other uses are authorized, implied, or prohibited. Zero forms of outdoor recreation are cited within Proclamations 9558 and 10285 as expressly prohibited or limited. All forms of outdoor recreation are thereby expressly or impliedly authorized, including (but not limited to): Motorized and mechanized vehicle use on designated roads Off road use by mechanized or motorized vehicles Rights-of-way Rock climbing Hiking Horseback riding Canyoneering Whitewater rafting Mountain biking Hunting and fishing Access to in-holdings and other valid existing interests While alternatives A, B, and C provide for some recreational opportunities in BENM, there are some unwarranted limitations and closures of public access for outdoor recreation in each of these three alternatives. Alternatives D and E impose broadscale restrictions and closures of public access for outdoor recreation that are both arbitrary and capricious in relationship to the stipulations for monument management as set forth in FLMPA and the Antiquities Act.	DECI07-Compliance with other laws and policies, REC01-General	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
889-72	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Even where interpersonal conflicts are alleged regarding specific routes, the agencies must closely examine whether such allegations of conflict concern genuine conflicts of uses or are simply subjective preferences regarding the preferred use of a given route. NEPA analysis must be based on facts, rather than subjective preferences and beliefs. Subjective preferences of users, individually or collectively, cannot justify elimination of access to the less popular or less conflicted users. The agencies obligation to consider user conflicts in travel management is derived from the Executive Orders issued by Presidents Nixon and Carter. See, E.O. 11644, 11989; 42 Fed. Reg. 26959. The present-day interpretation by some special interests and land managers does not rationally interpret this language. The actual wording refers to conflicts between uses not users. The historical context is relevant, as in the early 1970s off-highway vehicles were relatively new and largely unregulated. The EOs reflect a crude first step at the anticipated need to balance a new and developing use with the conservation efforts of the era reflected in contemporaneously adopted statutes like NEPA and FLPMA. In any event, it was not intended then, nor does it make sense now, to allow some quantum of subjective complaining by some class of user to exclude other users from public lands. Nor is subjective user conflict an environmental impact under NEPA. A recent Ninth Circuit decision correctly notes that controversy as a NEPA intensity factor refers to disputes over the size or effect of the action itself, not whether or how passionately people oppose it. Wild Wilderness v. Allen, 871 F.3d 719, 728 (9th Cir. 2017). The panel further indicated it need not address the question of whether on-snow user conflicts are outside the scope of the agencies required NEPA analysis entirely because they are citizens subjective experiences, not the physical environment. Id. at 729 n.2 (citations omitted).	DECI07-Compliance with other laws and policies, REC01-General	The Proposed Plan, and later implementation-level travel management planning, does and will consider the body of research on recreation conflict, including review by the Congressional Research Service, which documents interpretation of the interchangeability of "use" and "user" related to this topic as grounded in BLM policy handbooks 1221-2, 2930-1 and 8320-1, through rulemaking in 67 FR 61732, and documented in other associated guidance.
889-77	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Enacting such broad restrictions with no evidence supporting the asserted rationale for them is by definition arbitrary and capricious, and fails to meet the requirements of NEPA and section 706(2) of the Administrative Procedure Act, which requires agency actions to be supported by substantial evidence. As the Supreme Court has held, the agency: must examine the relevant data and articulate a satisfactory explanation for its action including a rational connection between the facts found and the choice made. Normally, an agency rule would be arbitrary and capricious if the agency has relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise. Motor Vehicle Mfrs. Assn. v. State Farm Mutual Automobile Ins. Co., 463 U.S. 29, 43 (1983) (citations omitted). The applicable arbitrary and capricious standard is narrow and the 10th 65 Circuit advises, [w]e confine our review to ascertaining whether the agency examined the relevant data and articulated a satisfactory explanation for its decision. Colorado Wild v. U.S. Forest Service, 435 F.3d 1204, 1213 (10th Cir. 2006). The focus is on the rationality of an agencies decision making process rather than on the rationality of the actual decision and the agencies action must be upheld, if at all, on the basis articulated by the agency itself. Id. Thus, the grounds upon which the agency acted must be clearly disclosed in, and sustained by, the record. Id. (emphasis added). Even this deferential review requires an agencies action to be supported by facts in the record. Id. Such facts must rise to at least the level of substantial evidence which is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion (quoting Pennaco Energy v. U.S. Dept of Interior, 377 F.3d 1147, 1156 (10th Cir. 2004)) and is something more than a mere scintilla but something less than the weight of the evidence. Id. (quoting Foust v. Lujan, 942 F.2d 712, 714 (10th Cir. 1991)). The EIS must state a clear rationale for the proposed restrictions on drone operation and describe why they are necessary to protect monument objects and values. As currently written, it does not meet this burden, and we do not believe protecting those objects requires any such restrictions.	DECI07-Compliance with other laws and policies, REC01-General	The Affected Environment for Wildlife was updated to include impacts to wildlife from drone use. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion. Impacts from drone use management actions are discussed in Natural Soundscapes, Lands and Realty, Recreation and Visitor Use, and Travel and Transportation sections of Chapter 3. This analysis demonstrates why restrictions on drone use are not arbitrary and capricious and took impacts on the natural and human environment into account. Restrictions of drone use in the Proposed Plan for the purpose of protecting BENM objects is consistent with applicable law.
889-78	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The only reason for prohibiting drones discussed in the EIS is preserving natural soundscapes, yet the agency in no way quantifies how much drone use in the monument impacts natural soundscapes, nor does it even make more than a cursory attempt to describe what the impacts of decreased natural soundscapes are. The DEIS does not even bother to allege specific harm from drone use on other monument visitors or wildlife, though we must assume such harms are alleged implicitly. The most concrete harm the DEIS discusses from artificial noise is to native American spiritual beliefs, which are not part of the physical environment and are not an environmental impact contemplated either by NEPA or the monument proclamation.	DECI07-Compliance with other laws and policies, REC01-General	The Affected Environment for Wildlife was updated to include impacts to wildlife from drone use. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion. Impacts from drone use management actions are discussed in Natural Soundscapes, Lands and Realty, Recreation and Visitor Use, and Travel and Transportation sections of Chapter 3. This analysis demonstrates why restrictions on drone use are not arbitrary and capricious and took impacts on the natural and human environment into account. Restrictions of drone use in the Proposed Plan for the purpose of protecting BENM objects is consistent with applicable law.
12746-14	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	Our concerns around the systemic failure to address recreational values for landscapes is further compounded when the various protections and analysis required by several Executive Orders from President Biden are reviewed. The Organizations would note that EOs 14008 and 14057 simply are not referenced in the Proposal despite these Executive Orders being issued by the same president within months of the Proclamation requiring the planning effort The Proposal provides no meaningful discussion of how compliance with various standards in Eos was determined and this is in stark contrast to the analysis required for these Executive Orders as they mirror many of the sentiments raised in the Proclamation. A full review and analysis of the various components of EO 14008 is critical to bringing balance to public lands and the Proposal is critical as there are three times recreational access and economic benefit of recreation are identified for improvement is specified in EO 14008. 214 of EO 14008 clearly mandates improved recreational access to public lands through	DECI07-Compliance with other laws and policies, REC01-General, DATA01-Analysis Methods and Data	While recreation is identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, it is specifically excluded from consideration as a Monument object to be protected. This is consistent with the direction of FLPMA, which provides for the use of some land for less than all of the resources, and of BLM Manual 6220- National Monuments, National Conservation Areas, and Similar Designations, which specifies that Monument lands may be managed for recreation only when that use does not conflict with the management of Monument objects. It is also consistent with EO 14008, which emphasizes protection of public land and water resources, including conserving 30 percent of our lands and waters by 2030, which would include those protections provided by Monument designation. While improved recreational access to public lands is address in the EO, it is not the only directive of the EO, as acknowledged in the comment. The management of

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			management as follows: It is the policy of my Administration to put a new generation of Americans to work conserving our public lands and waters. The Federal Government must protect Americas natural treasures, increase reforestation, improve access to recreation, and increase resilience to wildfires and storms, while creating well- paying union jobs for more Americans, including more opportunities for women and people of color in occupations where they are underrepresented. The clear and concise mandate of the EO to improve recreational access to public lands is again repeated in 215 of the EO as follows: The initiative shall aim to conserve and restore public lands and waters, bolster community resilience, increase reforestation, increase carbon sequestration in the agricultural sector, protect biodiversity, improve access to recreation, and address the changing climate. 217 of EO 14008 also clearly requires improvement of economic contributions from recreation on public lands as follows: Plugging leaks in oil and gas wells and reclaiming abandoned mine land can create well-paying union jobs in coal, oil, and gas communities while restoring natural assets, revitalizing recreation economies, and curbing methane emissions. Our position is the Proposal violates the mandate of 14008 to address recreational access and economic benefits of recreation to local communities. This must be corrected and addressed in the Proposal with required analysis and protections for recreational access. The Proposals complete failure to address similar Executive Orders is not limited to a failure to address compliance with EO 14008. EO 14057 issued by President Biden on December 13, 2021 are made.		recreational opportunities is considered in the Draft RMP/EIS in conjunction with recreational impacts on Monument objects.
12746-9	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The Organizations vigorously assert that recreation in all forms is protected by the Proclamation and has additionally required analysis in other Biden Executive Orders such as 14008 and 14057. Guidance on recreation management provided in the Proposal is woefully inadequate and, in many situations, existing SRMA type designations, with decent goals and objectives for management of the area, are simply removed entirely or reduced to ERMA designations with any reason provided. At no point does the Proposal attempt to replace or expand these resources that are being removed. Naked assertions of improved opportunities are not a replacement for management with deliverable standards and denable goals nor are they sufficient for NEPA compliance. This must be corrected simply to comply with the Proclamation and other Executive Orders requiring similar analysis for all management actions taken.	DECI07-Compliance with other laws and policies, REC01-General, DATA01-Analysis Methods and Data	The above Organizations are vigorously opposed to Alternatives D and E of the Proposal as we are unable to align these Alternatives with the basic purpose and need of the project or the requirements of the Proclamation designating the area. While the Proclamation repeatedly identifies a wide range of recreational opportunities and other values and factors to be protected in the Monument, these Alternatives consistently fail to recognize these values. We are unable to reconcile protecting recreational values in an alternative that would designate most of the Planning Area as an Area of Critical Environmental Concern or see to develop an entirely new planning model, when compared to USDA Forest Service and BLM planning regulations. The long-term conflict and challenge of attempting to align decisions such as this with traditional BLM management, such as budgeting and efforts like Great American Outdoors Act funding would be immense. Not only does this type of designation fail to meet the purpose and need of the Proclamation, many legal concepts and standards are twisted into new definitions to support the Alternative.
8999-16		International Mountain Bicycling Association	Fortunately, the BENM proclamation language allowed motorized vehicle use in the monument on both designated roads and trails . Again, the intent of the BLMs e-bike Rule as laid out below was to manage e-bike access similar to access afforded traditional bikes, ie. on trails and pathways set aside for bicycling. In August of 2019, Secretary of the Interior David Bernhardt issued Secretary's Order (SO) 3376 for the purpose of increasing recreational opportunities through the use of Electric Bikes (e-bikes). The SO directed the BLM (and other agencies) to expand access on public lands to e-bikes and begin the process of amending existing regulations to address e-bikes. The SO specifically directed the BLM to revise its off-highway vehicle (OHV) regulations at 43 CFR part 8340, and a proposed rule to revise them was published in April of 2020 (85 FR 20229) with the final rule published and becoming effective on December 2, 2020. The Final BLM e-bike Rule complied with the SO and amended 43 CFR 8340.0-5 to define e-bikes as limited to the Class 1, 2, and 3 e-bikes categories. While the BLM stated its intent for the rule to increase accessibility to public lands, the BLM was clear that e-bikes would not be given special access beyond what traditional, non-motorized bicycles are allowed. However, this statement above made it inherently clear that e-bikes were intended to be managed like traditional bikes even though the BLM defined them as a type of motorized vehicle. Importantly again, the Final Rule contains a provision to allow managers to authorize e-bikes/eMTBs on non-motorized bike trails. The rule provides that managers may authorize, through subsequent land-use planning (such as this BENM management plan) or implementation-level decisions, the use of Class 1, 2, and 3 e-bikes on non-motorized roads and trails by excluding e-bikes that meet certain criteria from the definition of off-road vehicle (otherwise known as an OHV) at 43 CFR 8340.0-5(a). While the BLM may also continue to manage e-bikes as OHVs and elect not to utilize the definitional exclusion at 43 CFR 4340.0-5(a), the uniqueness of ebikes and the outcomes based approach is that ebikes are generally intended to offer a bicycle light experience and are best suited on trails that limit or do not allow general OHV use. The DRMP does not meet the spirit or the intent of the BENM Proclamation: Outdoor recreation opportunities in the BENM landscape and their associated economic benefits are described well in both the 2016 and 2021 proclamations designating and restoring BENM	DECI07-Compliance with other laws and policies, REC01-General, TRAVEL01-General	Under the Proposed Plan, OHV use, including e-bikes, per 43 CFR 8340, would be limited to designated roads and trails designated for such use, and thereby providing recreation opportunities in BENM. The agencies will designate specific routes as OHV open, limited, or closed to OHV use as part of implementation level travel planning. The BLM has developed an Information Memorandum, Management and Use of Electric Bikes on BLM-managed Lands IM 2023-051, to establish policy concerning the use of e-bikes on BLM land and to implement the final e-bike rule. The BLM will comply with Management and Use of Electric Bikes on BLM-managed Lands IM through implementation level travel planning.
18657-35	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	There is also a high likelihood that restrictions on group sizes and special use permits could violate the Free Exercise Clause of the First Amendment as well, when applied to religious groups. It is highly likely that any limitations on group sizes would not apply to tribal members, as the BEITC management plan proposes to exempt tribal members from these limits. If the same group size limits or prohibitions on organized events do not equally apply to say, a Mormon group visiting sites of historical significance to them and a native group gathering for a tribal religious ceremony, that would be unconstitutional religious discrimination and would violate the Mormon groups free exercise and freedom of assembly rights under the First Amendment. It would also likely be found to	DECI07-Compliance with other laws and policies, REC05-Commercial, Competitive, and Organized Group Recreation	While the zones establish group size thresholds for casual (non-permitted) use, current allocations and group sizes for commercial use would remain in place until implementation planning is completed. The Proposed Plan is consistent with applicable laws and regulations.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			unconstitutionally discriminate based on race/ethnicity in violation of the 14th amendment. We therefore oppose the imposition of any arbitrary group size limits as currently proposed in multiple alternatives including Alternative E. The BLM and Forest Service must carefully evaluate any group size or special use permit regulations in the draft management plan for constitutional compliance and ensure that all such limits are narrowly tailored to meet a compelling governmental interest. No alternatives, or combination of alternatives, should be adopted that would be likely to fail to withstand judicial scrutiny under the First Amendment.		
17252-3	Dallas Safari Club; Archery Trade Association; National Shooting Sports Foundation; Boone & Crockett Club; Congressional Sportsmen's Foundation; Delta Waterfowl; Wild Turkey Federation; National Rifle Association; Rocky Mountain Elk Foundation; Tom Allen 1959 Stone Canyon Court Grand Junction, CO 81507;Association of Fish and Wildlife Agencies		Further, the BLM appears to be creating new criteria for closing land to recreational shooting and importing to the Wilderness Act something for which there is no prohibition; that is, the discharge of firearms. Wholesale prohibition of recreational shooting on land with wilderness characteristics clearly exceeds the agency's discretionary authority under the Chevron Doctrine and the requirements of the Dingell Act cited above	DECI07-Compliance with other laws and policies, SHOOT01-not in favor of shooting closures	The agencies consulted with DWR and PLPCO in accordance with the Dingell Act for recreational shooting closures in BENM. Consistent with the Dingell Act, the Proposed Plan would designate as closed to dispersed recreational shooting the smallest area for the least amount of time that is required for public safety, administration, and compliance with applicable laws. See Recreation and Visitor Services Section of Chapter 3for a discussion of impacts to BENM objects from recreational shooting.
14767-201	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section 3.4.2.2.2 describes impacts of ground-disturbing activities associated with management actions on sensitive soils, BSCs, and soil health and function. These impacts would apply to soils that would be disturbed under Alternative E. Any activity that results in increased erosion or topsoil disturbance could impair soil health and function and reduce BSC cover across the Planning Area. So again, the BLM admits that continued livestock grazing fails to comply with its mandate to protect and restore objects, yet it moves ahead regardless.	DECI07-Compliance with other laws and policies, SOILS01-General	See Chapter 3 (Soils and Biological Crusts) under impacts analysis for BSCs from livestock grazing. If monitoring indicates that domestic livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts in a manner that ensures protection of BENM objects. Livestock Grazing in Chapter 2 and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
17573-24	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	It is without question that NEPA governs this process. Therefore, it is critical to point out several violations of NEPA within the RMP/EIS. First, Section 102 of NEPA requires all agencies of the Federal Government to utilize a systematic, interdisciplinary approach which will ensure the integrated use of the natural and social sciences Within this RMP/EIS, the Agencies have failed to do this. Respectfully, it is unclear how the Agencies concluded that BEC and Tribal traditional and cultural knowledge is interchangeable with natural and social science, or where science ends and history and opinion begin.	DECI07-Compliance with other laws and policies, TIK01-Traditional Ecological or Indigenous Knowledge	The Proposed Plan uses a systematic, interdisciplinary approach and integration of natural and social science, based on the best available science. This is demonstrated by the inclusion of scientific reports and data in the affected environment and environmental consequences, and list of references cited. Per 40 CFR 1506.6 "in preparing environmental documents, agencies shall use high-quality information, including reliable data and resources, models, and Indigenous Knowledge".
18657-28	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The management approaches prescribed in the preferred alternative E emphasizing so-called Traditional Indigenous Knowledge violate the Establishment Clause of the First Amendment by expressly endorsing Native American religious beliefs and restricting or prohibiting recreational activities within the monument by non-Indians on the basis of those religious beliefs.	DECI07-Compliance with other laws and policies, TIK01-Traditional Ecological or Indigenous Knowledge	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. The Proposed Plan is consistent with applicable laws and regulations.
889-64	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The second provision is even more concerning, allowing the tribes through the BEC to nominate entire regions of the monument for complete and permanent closure to all public entry, even on foot. The main provision regarding this states, The agencies, working collaboratively with the BEC, would identify whether specific areas need to be closed to cross-country hiking to protect Monument objects, including cultural resources and wildlife, as informed by Traditional Indigenous Knowledge.33 Given the fact that there are very few designated foot trails in the monument and most of the canyons on Cedar Mesa have no formal trails, many popular destinations within the monument, including numerous ancestral puebloan ruins, are only accessible by cross-country hiking. While alternative E also provides for the designation of foot trails which could limit the negative impacts of this provision on hiking, if prohibitions on cross-country hiking are widely applied in areas where there are no designated trails, it could leave a significant percentage of the monument totally off limits to the general public. There are multiple other references throughout the DEIS allowing for widespread area closures, at least some of which tribal members would be exempt from when temporary closures are implemented for tribal ceremonial purposes. Given tribal access rights for various traditional purposes, it is likely tribal members would be exempt from the general area closures as well, meaning that the agencies would be effectively implementing a two-tiered system preferentially allowing public access based on race and ethnicity. We submit that such a system would unlawfully discriminate based on race in violation of the 14th Amendment as well as the Civil Rights Act, and also effectively results in the establishment of religion as prohibited by the First Amendment. While we strongly oppose these provisions, if they are to be carried forward, the agencies must provide much greater detail as to how they will be applied so as to avoid serious negative impacts on recreation and unconstitutional discrimination.	DECI07-Compliance with other laws and policies, TRAVEL01-General	The Proposed Plan would not close any portions of BENM to cross-country hiking. Any consideration for closures of areas would be consistent with applicable law, regulation, and policy including additional analysis under NEPA, NHPA, or other applicable authorities, as necessary. The agencies would also follow all applicable laws in implementing those closures and any exemptions.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17573-39	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Arch Canyon is not the only example of arbitrary and capricious decision-making within this RMP/EIS. It is used illustratively to show a broader concern. The Agencies have either not done any analysis or research on the roads or trails within these OHV-closed areas, or they are willfully ignoring facts that dont align with their myopic objective. This is not how NEPA planning is supposed to take place. No OHV Closed zones should be adopted without thorough analysis by the Agencies and an accompanying comment period for the public to be provided with accurate information, analysis, and detailed maps to aid in educated commenting on proposed plan alternatives. As stated previously, the Antiquities Act provides for the creation of national monuments. However, it does not abrogate the responsibility of the Agencies to follow the planning and management framework created by Congress.	DECI07-Compliance with other laws and policies, TRAVEL01-General	The public had opportunity to comment on proposed OHV area designations during the public comment period. In addition, the public was provided with both a static map showing each currently designated route and its status within an OHV Limited or OHV Closed area (EIS, Volume 2, Appendix A, Figures) and an interactive map allowing for the same information to be viewed in detail.. See the Travel and Transportation section of Chapter 3 for a discussion of impacts of OHV closures.
889-103	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We agree with all of the 2020 management plan guidelines for the Arch Canyon OHV route and RMZ and urge the agencies to incorporate them into the new management plan. There are no changed circumstances that justify closing the route to vehicles. Arch Canyon is also not in inventoried lands with wilderness characteristics, so that does not provide a reason to close this route either. The DEIS simply does not provide a rational basis for closing the Arch Canyon road on the basis of natural and cultural resource impacts, and if this closure is included in the final management plan, a court could only conclude such closure is contrary to the facts in the record and is therefore arbitrary and capricious.	DECI07-Compliance with other laws and policies, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon Sub-Area would be allowed with a permit. This permit system would allow for access to Arch Canyon. Permits could be used to limit factors such as vehicle type or seasons, reducing impacts to resources as discussed in the Water Resources section of Chapter 3, and could provide managers with tools to limit user conflicts.
889-24	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Any approach to travel management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized routes on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. This is particularly true of the proposal to close the Arch Canyon road and exclusively allow access via hiking and horseback, which would effectively exclude disabled users from Arch Canyon entirely. If the agencies persist with this action, the final EIS must acknowledge that the closure of Arch Canyon will have a severe and disproportionate adverse impact on environmental justice populations per the new NEPA rules, specifically people with disabilities. Motorized recreation (specifically OHV use) is therefore playing a major role in diversifying recreation on western public lands, which is one of the primary goals of the DOIs Equity Action Plan. Eliminating a significant amount of motorized recreational opportunities therefore runs counter to this goal and disproportionately affects racial and ethnic minorities who prefer motorized recreation over other forms of outdoor recreation.	DECI07-Compliance with other laws and policies, TRAVEL01-General, OTHER01-Other	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon Sub-Area would be allowed with a permit. This permit system would allow for OHV access to Arch Canyon. Permits could be used to limit factors such as vehicle type or seasons, reducing impacts to resources as discussed in the Water Resources section of Chapter 3, and could provide managers with tools to limit user conflicts. The permit system would be developed as part of the BENM Travel Management Plan in the future. The BLM manages motorized recreation act in accordance with applicable law and the Rehabilitation Act. Impacts to Environmental Justice communities and persons with disabilities are discussed in the Environmental Justice section of Chapter 3.
14767-202	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.3.1.1 the BLM discusses impaired waters, but fails to provide details regarding the action required under the TMDLs. This section also depends on DEQ for water quality monitoring even though the DEQs monitoring is extremely limited and not focused on the parameters affected by BLMs authorizations.	DECI07-Compliance with other laws and policies, WAT01-General	Under the management common to all alternatives in Section Water Resources of Chapter 2, it states that BLM will "Conduct comprehensive monitoring to track water quality conditions". Additionally, in the management common to all alternatives, it states that the BLM will "Follow management recommendations listed in the Utah Division of Water Quality (UDWQ) total maximum daily load (TMDL) reports on streams that are not meeting state water quality standards to improve water quality conditions". In Appendix N, Water Resources, Affected Environment, Surface Water watershed conditions for watersheds located in BENM are summarized . On NFS lands actions are taken to address TMDLs and improve water quality conditions, such as but not limited to, eradicating invasive species, improving natural habitat, and installing riparian enclosures to improve water quality.
18965-8	Simone Griffin	BlueRibbon Coalition	BRC opposes the two new proposed Areas of Critical Environmental Concern. The Aquifer Protection ACEC encompasses the entirety of the BLM managed lands within the monument. Never has the BLM in its history created an Aquifer Protection ACEC. This is unprecedented and unacceptable. The State of Utah monitors and manages the water rights within the state. There is no evidence that shows water within Bears Ears is contaminated. BRC has concerns that the BLM was implementing the new Conservation and Landscape Health Rule which prioritizes the designation of ACECs before the rule was finalized.	DECI07-Compliance with other laws and policies, WAT01-General, ACEC01-General	The Aquifer Protection ACEC was nominated during the RMP planning process and was therefore analyzed for relevant and important values and considered for inclusion in the Proposed Plan. The nominated Aquifer Protection ACEC was 1,012,371 acres and was considered in the alternatives. In the Proposed Plan in the sections on Special Designations, the agencies have chosen the alternative that reduced the size of the Aquifer Protection ACEC to 85,856 acres based on the location of the R&I values. The Aquifer Protection ACEC would not affect water rights and is designed to protect the aquifer from potential future contamination, to protect public drinking water sources adjacent to BENM. The John's Canyon Paleontological ACEC was not carried forward in the Proposed Plan.
17573-77	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The Utah Legislature has provided the DWR management authority over wildlife and its parts, including shed antlers, in the State of Utah. See Utah Code Title 23A. Managing wildlife parts, specifically antler sheds, goes hand in hand with managing, conserving, perpetuating, and protecting wildlife. Within the RMP section 2.4.2.1, the BLM prohibits the collection of BENM objects such as bones, animals, fish, and other products from animals unless permitted by BLM/USDA Forest Service authority. This conflicts with the DWRs authority and state code and should be corrected in the RMP. Section 2.4.11, Fish and Wildlife, should also recognize and reflect the States authority to regulate hunting and fishing. States' authority to manage wildlife within their borders derives from the 10th Amendment of the Constitution of the United States. The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or the people. Furthermore, under the Property Clause, the Courts have traditionally interpreted wildlife management as under the states' authority unless otherwise affirmatively stated by Congress. See Kleppe v. New Mexico, 426 U.S. 529 (1976). See also, Wyoming v. United States, 279 F.3d 1215, 1226-27 (10th Cir. 2002). The legal authority outlined by Congress for the BLM does not provide BLM	DECI07-Compliance with other laws and policies, WILDFISH01-General	The Proposed Plan is consistent with applicable laws and regulations. Clarification has been added to section 2.4.2.1 saying that "agencies would coordinate with State and local government and Tribal Nations on future maintenance and/or amending of this plan, as necessary as well as in the site-specific, implementation-level management that follows this plan".

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			wildlife management authority on lands managed by the BLM. Most importantly, the language in Presidential Proclamations 9558, 9681, and 10285, creating BENM under the Antiquities Act, expressly reserves management authority to the State of Utah.		
17252-8	Dallas Safari Club; Archery Trade Association; National Shooting Sports Foundation; Boone & Crockett Club; Congressional Sportsmen's Foundation; Delta Waterfowl; Wild Turkey Federation; National Rifle Association; Rocky Mountain Elk Foundation; Tom Allen 1959 Stone Canyon Court Grand Junction, CO 81507;Association of Fish and Wildlife Agencies		We also express opposition to Alternative E, the preferred alternative, inasmuch as it holds the potential for supplanting the authority of the Utah Division of Wildlife Resources over management of hunting by requiring a special permit system on federal lands in the BENA. This would occur if the Tribal Coalitions Plan, included in the Draft LUP/EIS, were to be adopted. Such a permit system would wrongly restrict the States authority to manage wildlife.	SHOOT01-not in favor of shooting closures, DECIO7-Compliance with other laws and policies	Proclamation 10285 incorporates by reference Proclamation 9558, which states that designation of BENM does not diminish the jurisdiction and authority of the State of Utah with respect to fish and wildlife management, including but not limited to hunting. The Proposed Plan does not supersede the authority of the Utah Division of Wildlife. Hunting is licensed, permitted, and enforced by the Utah Division of Wildlife.
14767-123	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In Section 1.2 the BLM misstates the very purpose and need for the RMP, when it states: Protect Monument objects in large, remote, rugged, and connected landscapes. This includes the entire landscape within the Monument and the objects for which the Monument was established to protect. The BLM conveniently ignores, as it does throughout the EIS, its mandate to restore the entire landscape and all objects. Again, this failure is a fatal flaw that vitiates the entire process	PURNE01-Purpose and Need	The agencies updated the Purpose and Need statement to include "restore" as suggested by the commentor.
14767-127	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The 3rd purpose and need is listed as: Protect the unique and varied natural and scientific resources of these lands. This includes objects identified in Presidential Proclamation 10285 such as biological resources Again, missing is the mandate to restore.	PURNE01-Purpose and Need	The agencies updated the Purpose and Need statement to include "restore" as suggested by the commentor.
14767-128	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Planning decisions can help re-evaluate and balance the trade-offs for the desired uses of the landscape with the need to protect the Monuments biological resources identified as objects. This further demonstrates that the BLM failed to comply with FLPMA 302 (a), The Omnibus Public Lands Act of 2009, the NLCS Secretarial Order and all of the BLMs own NLCS directives do not allow a balanced degradation of objects by discretionary uses. They mandates that discretionary uses, like private livestock grazing are not allowed in they do not protect and restore objects.	PURNE01-Purpose and Need	Under the Proposed Plan, 162,217 acres would be made unavailable/not suitable The agencies clarified the issues statement for Terrestrial Habitat and Vegetation to clarify discretionary uses. Grazing management in the Proposed Plan is designed to protect resources, including objects of BENM. Proclamation 10285 states: "the Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." Grazing is a discretionary action and agencies can under existing laws and regulations suspend or cancel permits and to close areas to grazing either temporarily or long-term.
14767-129	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The seventh purpose is stated as: Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects. Again, missing is the mandate to restore. But the EIS provides no rationale as to how these degrading actions are consistent with the protection, let alone the restoration of BENM objects.	PURNE01-Purpose and Need	Proclamation 10285 directs the agencies to protect and restore Monument objects. As stated in the seventh purpose and desired outcome of the Purpose and Need statement, livestock grazing and recreation uses are not identified in Presidential Proclamation 10285 as objects, but are discussed as important land uses in the area and that planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape.
18657-6	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The statement that Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape is grossly misleading, given that designated OHV routes and OHV riding areas are slated for significant restriction or closure within all five alternatives of the RMP. Additionally, a multitude of other outdoor recreation uses will be negatively impacted through implementation of any of the five alternatives. RMP planning managers must also take into account that when any OHV designated route or OHV riding area is restricted or closed, all other forms of outdoor recreation are immediately and irreparably harmed in addition to OHV recreation specifically, given that OHV motorized access is the primary form of all public access to all outdoor recreation that lies beyond the trail-end and boundary lines of OHV routes and riding areas. To restrict or close any OHV route or riding area is to restrict or close access for all outdoor recreationists for a vast swath of vested public land stakeholders and the general public.	PURNE01-Purpose and Need	The impacts from Travel and Transportation management actions are described in Chapter 3 in the Travel, Transportation, and Access Management section. See the Proposed Plan for Travel and Transportation Management Section in Chapter 2 for management actions regarding Open and Closed areas. In the Proposed Plan, the agencies propose to designate 928, 080 acres (68%) of BENM as OHV limited, meaning that OHV use would be allowed on designated routes.

Table U-10. Alternatives

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
8677-15	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 2-14, Table 2-3, row 8 (bottom row): Alternative A states: Vertebrate fossils may be collected only under a permit issued by the Authorized Officer (BLM)/Responsible Official (USDA Forest Service) to qualified individuals"; whereas all other alternatives (B-E) state Management not carried forward. As noted in multiple comments above, permitted collection of significant fossils is essential for resource preservation, scientific research, and to be consistent with existing federal laws and regulations. NHMU requests that the language for Alternative A be used for all alternatives (B, C, D, and E), making explicit that permitted fossil collection (as defined by PRPA) is allowed in BENM.	ALT01-Alternative A, PALEOGE003-Paleo	Under the Proposed Plan in the Management Actions by Alternative table for paleontological resources, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
19017-13	Sylvia Stubbs	San Juan County	The BEM includes some of the most scenic locations in the county and many such as Valley of the Gods, Moki Dugway and Indian Creek areas have been the locations for commercial filming. San Juan County and local communities have benefitted economically from such filming operations. We would hope that a more reasonable approach would be selected such as Alternative B to allow some degree of commercial filming beneficial to local economies. This would be more consistent with County policy to "Work in cooperation with public land-management agencies to permit and promote special uses, events and activities that support the local economy." (San Juan Resource Management Plan, Land Use, 2022).	ALT02; DECI07; EJSOC03	See the Lands and Realty section of Chapter 2, and the Proposed Plan column of the Alternatives for Lands and Realty table for direction management actions providing conditions for which filming may occur. Direction for the Proposed Plan incorporates some of Alternative B's proposed direction.
9372-9	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	On and off of Tribal Reservations, there is a high population of people in this area who are still reliant on firewood. Please consider the effect any additional closures or restrictions would have on those citizens. For those many people who have traditionally used firewood, and dont have adequate means to heat their homes by other means, it is a severe safety concern for those people who would find themselves finding alternative means for heat; means that are not within codes and have caused house fires in many cases. It is the seventh purpose of the proclamation to provide for use. The purposes of the monument can still be accomplished with the limits of alternative B, Alternative B would have approximately 930,910 acres open to wood product harvest (approximately 68% of the Monument) (page 27), without restricting those who use firewood and putting them in danger, as well as leaving wildfire fuel sources unused and wasted throughout the landscape.	ALT02-Alternative B, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	See the Proposed Plan column of Management Actions by Alternative table for Forestry and Woodlands for areas available and unavailable to wood product use. Under this same section, there is additional direction common to all alternatives, including the Proposed Plan, to prioritize making wood harvest products available to Indigenous people and other members of the public. Discussion of the impacts from wood product harvest on communities socially and economically can be found in the socioeconomic section in Chapter 3.
1484-5	Lisa Potter		Please modify Plan B the preferred alternatives plan to designate specific target shooting areas.	ALT02-Alternative B, SHOOT01-not in favor of shooting closures	The agencies considered the commentor's suggestion. Under the Proposed Plan, recreational shooting would be prohibited in BENM. See the Recreation Use and Visitor Services section of Chapter 3 for a discussion of impacts on recreational shooting closures on recreational users.
889-12	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Alternative B - This is the closest there is to being a pro-recreation action alternative, so of the action alternatives, we support this one the most, combined with some elements of alternative C. Alternative B maintains the most OHV-limited acreage, has the least amount of land managed for wilderness characteristics, and would allow at least some drone operation. It preserves motorized access to Arch Canyon and allows most other existing recreational opportunities to continue. Oddly, alternative B prohibits access to the interior of Moon House while the generally more restrictive alternative C continues to allow it. We oppose this aspect of alternative B and prefer the approach of alternatives A and C which continue to allow limited access to the interior corridor. Alternative B manages recreation primarily through a series of recreation management zones, which in some cases impose more restrictions than the preferred alternative E does. In that case, we prefer the less restrictive alternative. Overall, Alternative B provides a pragmatic approach to managing recreational activities in BENM, supporting both conservation goals and recreational interests effectively. This alternative allows for recreational diversity without overly restricting access, making it an appealing choice for promoting sustainable tourism and recreation in BENM. It provides the best balance between protection and access, offering a balanced approach to preserving the natural and cultural resources of BENM while allowing for recreational activities that are important for local tourism and community engagement. By focusing recreation within designated areas and improving management controls, this alternative can help mitigate potential damages and conflicts caused by unregulated recreational activities while giving the agencies the most flexibility in management decisions. It also provides the best support for the local economy. Allowing motorized recreation and drone flying in designated areas can attract visitors and support local businesses dependent on tourism, without compromising the monument's integrity and values.	ALT02-Alternative B, TRAVEL01-General, ALT07-Modification of Existing Alternatives	The proposed elements are within the range of analyzed alternatives. Therefore, no change to Alternative B.
1689-6	Ralph Ferrara, UT		Alternative C (2-83) calls for new campgrounds and designated dispersed camping in Indian Creek. This, in my opinion, is the best alternative for protection of monument values in Indian Creek. The specter of Individual Special Recreation Permits referred to on that page would be unsustainable and cumbersome, although in many ways, ISRPs are a difficult concept to understand.	ALT03-Alternative C	Under the Proposed Plan, new campgrounds and designated dispersed sites may be developed in Indian Creek. ISRPs are widely used in the BLM to manage recreational use and may be fee or no-fee.
3125-27	Steve Knox		Page 2-39 and 2-40, Special Designations, Table 2-9, 2008 Monticello RMP, Johns Canyon Paleo ACEC action, Alternatives D and E The proposed management prescription would allow vegetation management, surface disturbing activities, and limited OHV use. The ACEC is located in the Grand Gulch ISA Complex (WSA) and likely would not be allowed under Handbook 8550-1, the IMP for Lands Under Wilderness Review.	ALT03-Alternative C, ACEC02-Existing ACECs, ALT04-Alternative D	Thank you for your comment. Under the Proposed Plan John's Canyon is not an ACEC.

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889-13	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Alternative C - This alternative is similar to Alternative B but with stricter management of motorized aircraft and drone operations, allowing their use only through formal authorization where beneficial to the monument's objectives. Drone operations are particularly restricted to protect natural soundscapes, which as discussed below is completely nonsensical as much louder motorized vehicles will continue to be allowed while quieter drones cannot be flown even in otherwise motorized areas. OHV access is largely the same as alternative B, and motorized access to Arch Canyon would continue. Importantly, alternative C is the only action alternative which would continue to allow access to the interior corridor of Moon House, which is the most popular archeological site in the monument and one of its principal attractions. The loss of access to the spectacular interior of the ruin in every other alternative is a severe blow to recreation and would significantly harm the visitor experience in the monument. We support alternative Cs approach of continuing to allow access to the interior corridor while maintaining the existing stipulation that only 4 persons are allowed inside at a time.	ALT03-Alternative C, ALT07-Modification of Existing Alternatives, TRAVEL01-General	Drone use in airspace is managed by the Federal Aviation Administration Civil Operations Part 107. However, the agencies have the authority to manage the casual use landing or taking off of drones on BLM-administered and NFS lands. Additionally, the agencies have the discretion to dictate all aspects of drone use if that drone is being used as part of a permitted activity. Under the Proposed Plan, takeoff and landing of drones would be allowed at the Fry Canyon Airstrip or Bluff Airport, or by permit where the uses advances the protection of BENM objects. Restrictions of drone use in the Proposed Plan for the purpose of protecting BENM objects is consistent with applicable law. Although inadvertent, impacts from visitation do occur every time a visitor enters the interior corridors of Moon House, The Cultural Resources section in Chapter 3 has been updated for impacts to Moon House and cultural resources generally. Additionally, Moon House, while an important recreation destination for visitors, is not the most visited or most popular archaeological site in BENM. Visitation to Moon house will still occur under the Proposed Plan via an allocated permit system, like current management, but access to the interior corridor will be prohibited. This was analyzed in the EIS and this action should help preserve the site for future generations.
1667-5	Molly Malone		Page 3-23, Alternative C states: Alternative C requires an Individual Special Recreation Permit (ISRP) for all climbing activity in the Indian Creek SRMA and imposes group size limits, as well as the same seasonal closures as Alternative B. This looks like a complete ban on climbing, camping, and use of the area. This will effectively destroy much climbing tourism and visitation to the area. Alternative C is not a good plan for any recreationalist and would harm small local communities economy by making day use activities harder to do.	ALT03-Alternative C, REC01-General	Under the Proposed Plan Indian Creek would be managed as Indian Creek Management Area as described in Appendix E. Future development of a RAMP would address group size limits among other topics, until then, the 2020 BENM MMP and 2008 Monticello Field Office RMP would remain in effect. Future recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
18275-8	Jamie Ervin	Outdoor Alliance	We also recommend that the agencies reconsider Alternative Cs requirement that climbers acquire an Individual Special Recreation Permit (ISRP) for all climbing activities.25 Instead, the Final RMP should adopt an adaptive management approach by which permits could be required if data shows that voluntary compliance with climbing area restrictions (such as for nesting raptors) is not adequate.	ALT03-Alternative C, REC01-General	The Proposed Plan direction analyzed under Alternative C was not carried forward into the Proposed Plan. Under the Proposed Plan Indian Creek would be managed as Indian Creek Management Area as described in Appendix E. Future development of a RAMP would address more specific management of that area, until then, the 2020 BENM MMP and 2008 Monticello Field Office RMP would remain in effect. Future recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
908-5	Lawrence Stoker Las Vegas, NV		Page 3-23, Alternative C states: Alternative C requires an Individual Special Recreation Permit (ISRP) for all climbing activity in the Indian Creek SRMA and imposes group size limits, as well as the same seasonal closures as Alternative B. This looks like a complete ban on climbing, camping, and use of the area. This will effectively destroy much climbing tourism and visitation to the area. Alternative C is not a good plan for any recreationalist.	ALT03-Alternative C, REC03-Dispersed Recreation (where there are no formal recreational facilities)	The Proposed Plan direction analyzed under Alternative C was not carried forward into the Proposed Plan. Under the Proposed Plan Indian Creek would be managed as Indian Creek Management Area as described in Appendix E. Future development of a RAMP would address more specific management of that area, including group size limits, camping, and potential permits, until then, the 2020 BENM MMP and 2008 Monticello Field Office RMP would remain in effect. Future recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
19035-4	Gail Johnson		Alternative D would put a number of permittees out of business, including us. This alternative takes in 90% of our winter range. For the past 150 years, the areas now called Happy Jack Pasture, Gravel Canyon Pasture, Short Canyon Pasture, and Horse Tank Pasture have been available and suitable. They are all in the White Canyon Allotment and we have an active grazing lease. We graze these areas every year. They are vital to our operation. There are county roads in them. Highway 95 goes right through Happy Jack Pasture. Yet there is no criteria or documentation given in the draft plan explaining why these areas suddenly are now unavailable/unsuitable. Why the sudden change? There is nothing in the plan that explains why these designations were made. No criteria in which to rebut this action.	ALT04; EJSOC03	The Proposed Plan does not include additional acres unavailable to grazing in the White Canyon allotment (see the figure Proposed Plan, Grazing, and Trailing with Allotments in Appendix A). BLM Land Use Plan Handbook H1601, Appendix C.II.B, provides the criteria for identifying lands available or not available for livestock grazing. In the Livestock Grazing section of the Proposed Plan, livestock would be physically restricted from these areas based upon topography (e.g., cliff lines) and/or fences. Site specific barriers (e.g., fences) would be implementation level decisions, yet these areas essentially have current barriers or fences that can already exclude livestock at the time the Record of Decision is issued. This would not require areas being made unavailable in adjacent areas because existing barriers were used to form the boundaries. The Proposed Plan includes acres unavailable to grazing and limited to trailing only that are currently grazed. The unavailable allocation would take effect once the ROD is signed, however, the BLM would need to undertake additional processes to modify permits or to construct fences if needed to prevent access, if necessary. Under the Proposed Plan, grazing will continue as a use within BENM, subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the proper care and management of the objects identified in Proclamation 10285. The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing; the impact of making these areas unavailable is analyzed in the Livestock Grazing section of Chapter 3.
19041-1	Don Holyoak	SE Utah Grazing Improvement Program	Alternative D. increases the unavailable/unsuitable acreage to a total of 359,201~ acres, and increases the trailing-only acreage to 48,889 acres. This reduction in grazing acres will definitely reduce the AUM's in every pasture. These pastures have been used for nearly 150 years for grazing. They are not in remote, inaccessible narrow canyons. They have county roads throughout them, as well. Happy Jack Pasture even has State Highway 95 running right through it. Also, as examples, Point Lookout Pasture, Slickhorn Pasture, Harts Draw Pasture, Butler Wash, Gravel Canyon Pasture, Horse Tanks Pasture, Short Canyon Pastures, etc. have excellent cattle feed, i.e. Indian rice grass, curly grass, sand drop seed, sage and rabbit brush, wild cow alfalfa, salt brush, black brush, etc. We	ALT04; GRAZ01	The Proposed Plan includes additional acres made unavailable to grazing, however AUMs would not be impacted by the unavailable areas. The impact of making these areas unavailable is analyzed in the Livestock Grazing and Environmental Justice and Social and Economic Values sections of Chapter 3. The BLM Land Use Plan Handbook H1601, Appendix C.II.B, provides the criteria for identifying lands available or not available for livestock grazing. In the Livestock Grazing section of the Proposed Plan, livestock would be physically restricted from these areas based upon topography (e.g., cliff lines) and/or fences. Site specific barriers (e.g., fences) would be implementation level decisions, yet these areas essentially have current barriers or fences that can already exclude livestock at the time the Record of Decision is

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			think that all the pastures listed in Alternative D are available/suitable for grazing and always have been. That's why they are called "pastures". In fact, in several cases the reduction of grazing on some of the affected allotments would eliminate the bulk of their winter range and essentially put the permittee out of business. The White Canyon Allotment is an example of an allotment that would be hurt this way. If there are specific cultural resources of special concern by the agencies in these areas, then the RMP should have detailed those concerns so that we could address them. Without that information. we totally disagree with everything in Alternatives Band D.		issued. This would not require areas being made unavailable in adjacent areas because existing barriers were used to form the boundaries. The Proposed Plan includes acres unavailable to grazing and limited to trailing only that are currently grazed. The unavailable allocation would take effect once the ROD is signed, however, the BLM would need to undertake additional processes to modify permits or to construct fences if needed to prevent access, if necessary Grazing may continue subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the proper care and management of the objects identified in Proclamation 10285.
612-1	Judi Brawer		The use of the word "restrictive", especially related to alternative D is divisive and not descriptive of the management provisions. Please avoid using it. To be most helpful and less divisive it would be much more effective to describe what alt. D does in the positive versus negative.	ALT04-Alternative D	Updates were made to the environmental impact statement and environmental consequences discussion of alternatives and comparison of them to one another.
889-3	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We strongly urge the agencies to maintain the status quo and continue the management approaches established in the 2020 management plans for the two units of the reduced size monument, applying the same approaches to the newly re-enlarged monument. By and large, the agencies current management techniques are working well and need only minor adjustments to allow a good balance between protecting the monument objects and values and continuing to provide a wide range of high quality recreational opportunities throughout the monument. Any radical changes such as mass road closures or the establishment of new lands managed for wilderness characteristics should be avoided, as they are excessive and unwarranted by the facts on the ground. We particularly urge the agencies to keep in place the 2020 Management Plans decision regarding the motorized route in Arch Canyon, and we are extremely disappointed to see that Arch Canyon is proposed as an OHV closed zone in both alternative D and E. The Arch Canyon road has been analyzed numerous times by the BLM in recent years and upon every occasion has been found to have a valuable purpose and need for motorized recreation that outweighs any minor environmental impacts caused by the use of this route. The Arch Canyon road is currently well-managed and is not causing any significant impacts that warrants closure.	ALT04-Alternative D, ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
9160-3	Gary Stetler 329 IRON HORSE CT. GRAND JUNCTION, 81507		Having read the summary sheets of the proposal, I find alternative D to be the most appealing alternative. Especially if it included the preamble to alternative E: " maximizes the consideration and use of Tribal perspectives on managing the landscape of BENM."	ALT04-Alternative D, CUL01-General	The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations.
10857-5	Shawn Ivins		In the grazing section under Alternative D there are big swaths of grazing land that is deemed unavailable/not suitable for livestock grazing. Removing these areas from grazing would greatly hinder ranchers ability to manage and protect resources within the monument. Taking these areas away from the existing permits would take away options for ranchers to be able to rotate grazing areas and diminish their ability to rest pastures like has been done in the past. These proposed closed areas are pristine and have been successfully grazed and managed in the past and to suddenly deem them as not suitable is not logical. That being said, Alternative D in the livestock grazing section does not coincide nor follow the mandate in the Presidential Proclamation 10285 that states that The Secretaries shall manage livestock grazing as authorized under existing permits or leases.	ALT04-Alternative D, GRAZ01-General	Under the Proposed Plan, grazing will continue as a use within BENM, subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the proper care and management of the objects identified in Proclamation 10285. The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing. The impact of making these areas unavailable is analyzed in the Livestock Grazing section.
889-48	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	West of the Bridger Jack Mesa is a series of 4x4 roads in Beef Basin. These roads provide a valuable loop opportunity through the Beef Basin area and allow people to visit multiple spectacular ancestral puebloan ruins. The main Beef Basin road descends down the challenging Bobbys Hole Dugway and connects to the southern end of the Elephant Hill Jeep Trail in the Needles District of Canyonlands National Park. This connection creates another amazing overland opportunity, allowing drivers to travel all the way from the Elephant Hill trail, through Beef Basin, over Elk Ridge, and down the Hotel Rock trail to Arch Canyon. This overland route and all of its side spurs must remain intact. Alternative D would close multiple spur roads in this area which access scenic campsites and puebloan ruins, which is not justified and would deprive the public of valuable access.	ALT04-Alternative D, TRAVEL01-General	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, to support National Park Service management of soundscapes and visual resources. However, some locations, including the routes leading to Elephant Hill, were designated as OHV limited to allow NPS permitted opportunities. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, to support the NPS's ability to provide road and trail opportunities. Some routes within Beef Basin adjacent to NFS lands are within OHV closed areas to protect BENM objects.
9372-31	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Another notable closure in alternative D is Moqui Canyon (D3486). The only reason given for closing this trail is to put some groups of users of other groups of users. This road, like Mikes Canyon, provides access for cattlemen as well as bighorn sheep conservation as well as State Trust Lands. These same principles apply to an entire trail system through Bull Valley and Imperial Valley. To close as many miles and acreage access that the Imperial Valley Trail system provides as well as its access to grazing, State trust lands, bighorn sheep conservation, and even remote portions of Glen Canyon NRA, there should certainly be some discussion or at least some discussion towards its closure.	ALT04-Alternative D, TRAVEL01-General	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, to support National Park Service management of soundscapes and visual resources. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, to support the NPS's ability to provide road and trail opportunities.
889-14	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Alternative D - This alternative is the strictest of the two conservation alternatives, carrying over all the worst features from alternative E and adding additional layers of restrictions focused specifically on wilderness characteristics. As currently written, alternative D would be devastating to all forms of recreation, as it would eliminate the vast majority of recreational opportunities within the monument. Strict group size limits and permit requirements would prevent most casual users and families from engaging in even non-motorized recreation within the monument. Drone flying would be entirely banned within the monument as in alternative B. The worst effects of this alternative would fall on	ALT04-Alternative D, TRAVEL01-General, ALT07-Modification of Existing Alternatives	The alternatives analyzed provide a spectrum of potential actions, and the Proposed Plan does not carry forward many of the concerns the commenter has raised about Alternative D. See the Recreation and Visitor Services, as well as the Travel and Transportation Management sections of Chapter 2 and the Proposed Plan column for management actions regarding OHV closed, open, and limited as well as recreation zones. Appendix E provides more specific content on the recreation zones and sub areas and management areas. The Proposed Plan allows motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including, but not limited to, type of

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			motorized recreation. This alternative proposes to manage all areas of BLM lands within the monument found to have wilderness characteristics as BLM Natural Areas managed for wilderness characteristics and closed to motorized use. This provision alone would have a devastating effect on motorized recreation within the monument, as it would mandate the closure of all existing primitive roads that were classified as ways within lands with wilderness characteristics rather than roads, which is largely a distinction without a difference. Hundreds of miles of valuable roads would be arbitrarily closed, with the agencies having no discretion to keep open roads that access important destinations or provide exceptional recreational experiences. Routes that were classified as roads and were thus excluded from inventoried lands with wilderness characteristics or cherry-stemmed through them would be spared from mandatory closure, but would likely be closed in subsequent travel planning because of alleged negative effects on adjacent lands managed for wilderness characteristics. And that is only in the BLM portions of the monument. The wilderness characteristics allocations and concomitant OHV-closed area designations in alternative D would guarantee the closure of many of the most valuable class D roads in the monument, including the end of the Chicken Corners Jeep Safari Trail, numerous spur routes off Lockhart Basin Road, all of the roads in the Imperial Valley area of Beef Basin including critical connecting routes that provide the sole access to designated motorized routes inside the Glen Canyon National Recreation Area, Moqui Canyon, Mikes Canyon, Lavender Mesa, and many others. The popular Arch Canyon road would also be closed in this alternative. The hundreds of miles of motorized route closures mandated by this alternative would not only affect OHV enthusiasts, but every other recreational group that depends on motorized access to reach recreation destinations adn trailheads within the monument. With so many areas managed for wilderness characteristics and off limits to vehicles, the more remote parts of the monument would become basically inaccessible for all forms of recreation, as it would require backpacking dozens of miles over multiple days just to reach these areas. Day hikers, rock climbers, horseback riders, and mountain bikers would all have their ability to recreate within the monument severely curtailed. No user group would be left unharmed by the decimation of the road network proposed in alternative D. Even the tribal groups that are pushing for the most restrictive management options would be severely harmed by this alternative, as they too ultimately depend on motorized vehicles to access most of the monument. Unless they were somehow exempt and allowed to drive on roads that had been closed and managed as de facto wilderness, they would be unable to access many cultural sites important to them. The drastic restrictions on all forms of recreation proposed in alternative D are simply not warranted and are utterly unnecessary to protect the monument objects and values. Indeed, these kinds of excessive restrictions are precisely what the opponents of the monuments designation feared and are what made it so controversial in the first place. If alternative D was adopted as the basis for the monument management plan, it would likely galvanize increased political opposition to the monument that could result in Bears Ears either being re-shrunk by a future president or abolished altogether by Congress. We urge the agencies to think long and hard about the potential consequences before incorporating any element of this extreme alternative into the final management plan. We request that the EIS fully analyze the impacts of this alternative on recreation opportunities within the monument, including specifying exactly how many roads would be required to be closed and what recreational opportunities would be lost as a result. We also note that as part of the basic requirement under NEPA to analyze all impacts on the human environment, the agencies must fully analyze the economic impacts to nearby communities from closing most of the monument to recreation.		vehicle, season of use, or timing restrictions. The Recreation Use and Visitor Services section as well as the Travel, Transportation, and Access Management section analyze the suite of alternatives discussing impacts from discretionary actions on recreation use and visitor services,
3125-30	Steve Knox		Page 2-47, 2.4.11, Wildlife and Fisheries, Table 2-10, 2020 ROD/MMP, 3rd action (last action on the page), Alternative D There is a lot of dry country in the BENM and substantial recreation use, especially in the canyons (where there is likely to be water). Can you reasonably expect visitors not to pump water especially on extended backcountry trips? The action in Alternative E seems more practical and safer for visitors.	ALT04-Alternative D, WILDFISH01-General	Under the Proposed Plan in the Wildlife and Fisheries section the agencies in collaboration with the BEC and as informed by Traditional Indigenous Knowledge will monitor water resources and identify whether water pumping for recreational use needs to be limited in any specific areas to protect BENM objects.
19015-2	Linda Patterson cactuschic@gmail.com		Co-management with the BEC, of grazing, grazing allotments or forage allocation should not be allowed as in Alternate E.	ALT05; ALT07; GRAZ01	Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The Proposed Plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Service's cooperative agreement with the BEC. The permit holder is always included when making decisions about their permits. In addition, Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, subject to existing laws and regulations. These regulations require coordination and consultation with interested publics and governmental agencies.
19017-28	Sylvia Stubbs	San Juan County	p. 2-125 Areas Unavailable to Livestock Grazing The exceptions in Alternative E appear to be unrelated to the other alternatives but are likely actions included in the MCAs. Please revise this alternative for clarification and better understanding of all alternatives. The 2nd bullet statement should be deleted as this is procedure addressed in the grazing regulations which is unnecessary to repeat here.	ALT05; GRAZ01	Thank you for your comment. The management actions under Alternative E were revised for the final EIS and the direction regarding noncompliance with terms and conditions was moved to the management actions common to all alternatives, including the Proposed Plan. See the Livestock Grazing section of Chapter 2 for where these refinements have been made.
19043-3	William Skelton whshome@bellsouth.net		Although a good argument can be made to do so in view of the devastation grazing causes, we don't expect you to ban all grazing. However, grazing should be banned from all areas that provide quality	ALT05; GRAZ01	The Proposed Plan in the Livestock Grazing, Soil Resources, Vegetation, and Cultural Resources sections in Chapter 2 include management actions for the protection of water resources, soils, vegetation and

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			hiking and backpacking experiences, that have any significant cultural resources, or which have perennial surface water, riparian areas, and springs. Your draft Plan does not do this. I have over the years seen the incredible damage done by grazing, which continues, to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final Plan should also require the agencies to immediately begin compliance monitoring and resource assessments and prohibit new water developments.		cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Livestock Grazing section under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: the primary purpose is to protect or enhance BENM objects; and, on BLM-administered lands only, unless a current (within the last 10 years) land health assessment has been completed. Under the Proposed Plan, grazing is excluded from developed recreation facilities, which includes developed campgrounds, developed trailheads, and cultural sites that are Public Use (Developed)" (Chapter 2 of the Draft RMP/EIS).
19010-4	Jim Mullins		Lastly, Alternative E's emphasis on Traditional Indigenous Knowledge and techniques for vegetation management should be adopted. Use of mechanical treatments and commercial timber harvests should be prohibited.	ALT05; HABVEG01	A full range of alternatives regarding forestry and woodlands is provided in the associated section in Chapter 2. All alternatives were developed in collaboration with the BEC and Tribes.
19043-7	William Skelton whshome@bellsouth.net		I support Alternative E's emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management. To best protect sensitive resources and cultural sites. Alternative E should also be modified to prohibit mechanical treatments and commercial timber harvest, and require the use of native seeds for revegetation and reclamation.	ALT05; HABVEG01	See the Proposed Plan in Fire Management and Vegetation sections of Chapter 2. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
19041-3	Don Holyoak	SE Utah Grazing Improvement Program	Alternative E is inherently unfair to all users. No user group should be given authority or primacy over other user groups. All user groups should be treated fairly and with respect and allowed to give recommendations – to be part of the discussion. It is the agencies' responsibility to take these recommendations and make management decisions. No one user group should have veto power over the agencies and primacy over other users. Bears Ears Commission via the Inter-Tribal Coalition has been given primacy over other user groups.	ALT05; PUBL02	Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Proclamation 10285 re-establishes the BEC and directs the agencies to meaningfully engage with the Commission, including through the planning process, to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations.
19043-1	William Skelton whshome@bellsouth.net		A major problem with your preferred Alternative E is that it does not use the BLM Recreation planning framework and is therefore somewhat general. Indeed, it is somewhat surprising that you are proposing to endorse such language as "The BEC does not recognize recreation as an appropriate use of public lands within the Bears Ears National Monument." Recreation should clearly be a planned use of the Monument, but recreation that does not abuse the land and its resources. Hiking and backpacking and llama packing have minimal impacts on the land and resources, unlike horse use and especially ORV use. Your document should CLEARLY acknowledge that hiking and backpacking and llama packing are acceptable uses of the Monument. You do say recreation will likely continue and should be managed, but that is a half-hearted and lame statement when you start off with a view of no recreation being appropriate.	ALT05; REC01	The BLM and USDA Forest Service manage a variety of recreational uses and will continue to do so under the Proposed Plan.
19043-2	William Skelton whshome@bellsouth.net		There are some exclusions from Recreational Management zones of canyons that should be in them. Examples are Point Lookout Canyon and Moqui Canyon/North Gulch which do appear to be included in the Grand Gulch ISAs and Mancos Mesa ISA (Figure 2-10).	ALT05; REC01	The areas referred to in the comment are not included in a Sub-Area in the Proposed Plan as they do not require additional management toward recreation. Please see the updated interactive map available on ePlanning, which allows for comparison of data at a fine scale.
19017-5	Sylvia Stubbs	San Juan County	In Alternative E it appears the word "new" was left out as the adjective for discretionary actions. "New" is included in the other action alternatives so it is unknown whether its omission in Alternative E is intentional or unintentional. Please clarify as this is critical to understanding the alternative.	ALT05; SOILS01	The Proposed Plan states: "No discretionary actions would be allowed on slopes greater than 30 percent unless necessary to protect BENM objects." The language in Alternative E was intentional.
19010-2	Jim Mullins		First, adopt Alternative E's closure of Arch Canyon to motorized use. In addition, the final plan should expand closure areas to protect the Monument's significant resources that are endangered by motorized vehicle use.	ALT05; TRAVEL01	The Proposed Plan manages motorized access to Arch Canyon by a permit system. During implementation level planning agencies may apply additional limitations including, but not limited to, type of vehicle, season of use, or timing restrictions. The BLM manages motorized recreation act in accordance with applicable law and the Rehabilitation Act.
3814-3	Andrew Ashburn		I support a drastically enhanced emphasis of local Indigenous knowledge, traditional culture, and sustainable lifeways. You must help ensure natural processes of botanical stewardship. Better protect sensitive geographical features and all living wild beings! Defend sites of intrinsic cultural value essential to continued ethnic integrity! Prohibit motorized-tool use! Forbid commercial timber harvests or sales! Require revegetation be done exclusively with locally Indigenous seeds! This must be the policy for any natural reclamation process.	ALT05-Alternative E	Consistent with Proclamation 10285, the Proposed Plan directs the agencies to collaborate with the BEC on implementation of the management plan and management of the entire Monument. The Proclamations also direct the agencies to include Traditional Indigenous Knowledge and expertise in the management of BENM. See the Proposed Plan in the Vegetation Section and the Forestry and Woodlands Section. In the Vegetation Section, the Proposed Plan says that vegetation management would include all available tools, including mechanical methods, consistent with the protection of BENM objects. No chaining would be allowed and light-on-the-land techniques would be used where practicable. The Proposed Plan would also prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. In the Forestry and Woodlands section, the Proposed Plan says that agencies would collaborate with the BEC to identify criteria and/or areas for commercial timber harvest if activities protect BENM objects.

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7085-3	Stefanie Kunze		In addition to supporting Alternative E, I support Grand Canyon Trusts recommendation that bars mechanical treatments for vegetation management including clearcutting, uses only native seeds in restoration projects, and enacts immediate protections for old-growth trees. Western land management has shown to not improve existing Indigenous land management practices and tends to further harm a sensitive area, such as Bears Ears.	ALT05-Alternative E	See the Proposed Plan in the Fire Management and Vegetation sections. The Proposed Plan says that vegetation management would include all available tools, including mechanical methods, consistent with the protection of BENM objects. No chaining would be allowed and light-on-the-land techniques would be used where practicable. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the vegetation and cultural resources sections for discussion of impacts to vegetation and cultural resources, respectively, from vegetation management.
7167-2	Bob McCready Longmont, CO 80504		In addition, I would encourage the inclusion of additional measures that reduce or eliminate grazing in biologically and culturally sensitive areas.	ALT05-Alternative E	The Proposed Plan includes additional acres on BLM made unavailable to grazing or limited to trailing only than is currently grazed. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
11232-9	Andy Butler		Overall, I support the Preferred Alternative E, with some modifications. I support the closure of Arch Canyon to all motorized use, and other restrictions of OHV use outlined in Alternative E. Ive backpacked and hiked Arch Canyon (most recently in October 2023). Motorized vehicles have seriously impacted the environment and cultural resources of the Canyon. The final Management Plan should expand closure to motorized vehicles to all areas with the most significant cultural and environmental values. In terms of back country air strip closures, I support the closures in Alternative E. Most of the other strips wont really improve recreational access. Use could be allowed under emergency conditions (fire fighting, rescue, etc). If you are going to limit OHVs and UAS, it makes no sense to allow noisy airplanes to land and take off at the backcountry sites.	ALT05-Alternative E	Under the Proposed Plan, motorized and non-motorized use in Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future. The analyzed alternatives include a range of areas closed to motorized vehicles, so no change was made to the alternatives. The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
11493-5	Michelle Peot Leeds, UT 84746		While I support the majority of the provisions in preferred Alternative E, to maintain the monuments riparian zones, it is imperative that watershed protections be maximized. The following modifications are recommended: . Incorporate the more expansive Aquifer Protection ACEC designation outlined in Alternative D. . Revise the grazing allotment retirement list to reflect Alternative D, while still conducting compliance monitoring and necessary livestock unit/seasonal adjustments outlined in Alternative E. . Ensure that sufficient monitoring data is collected for monument watersheds to adequately assess impaired water status. Adjust usage management policies as needed to maintain watershed health.	ALT05-Alternative E	The range of management options in the EIS include the management suggestions listed in the comment, so no change to the alternatives was made.
15841-1	Benjamin Smedley		I do not support the Alternative E draft resource management plan of Bears Ears National Monument because it is larger than it needs to be, and I think the boundaries of the monument need to be readjusted to include only indigenous land that is actively used and legitimately popular and useful climbing and recreational areas.	ALT05-Alternative E	Thank you for your comment. Adjustment of the boundaries of Bears Ears is beyond the scope of this analysis. The boundaries of BENM are outline by the Presidential Proclamation 10285
16269-1			I think the best alternative is E with increases in land protections and tribal co-management. Grazing needs to be done responsibly (overall amounts of sensitive grazing area decreased and sensitive areas restricted with range-riders monitoring). Listen to the Bears Ears Inter-Tribal Coalition Land Use Plan. As for motorized use, close motorized routes that harm monument objects and values, including springs, riparian areas, vegetation, soils, and cultural objects. Widespread off-road vehicle use should not be allowed, and no additional routes should be designated. Stop chaining of native vegetation and replant only native vegetation/seeds. As for designation of Areas of Critical Environmental Concern (ACEC): please designate all the ACECs proposed in Alternative E, especially the large Aquifer Protection ACEC. Protecting healthy landscapes in these ACECs is more effective than attempting to restore degraded ones.	ALT05-Alternative E	See the Proposed Plan in the Areas of Critical Environmental Concern section for ACEC designations. The Proposed Plan includes the designation of ACECs. The agencies collaborated with the Bears Ears Commission on the development of the Proposed Plan.
16619-1	John Siekmeier 1150 Lawn Ave Grant, MN 55115	Minnesota Division, Izaak Walton League of America	I urge you to adopt the preferred alternative E of the draft Resource Management Plan and offer these important improvements. The agency should: Ensure that native people are proactively involved and effectively collaborate in all planning processes and resource management decisions. Use management zones to fully protect back-country areas. Expand closure areas to protect the monuments most significant resources that are at risk from motorized vehicle damage. No additional routes should be designated. Proactively manage aircraft within the monument to maintain natural soundscapes and viewsapes. Immediately begin surface and groundwater compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs. Prohibit mechanical treatments, commercial timber harvest, and require native seeds for revegetation and reclamation. The Bears Ears National Monument deserves the highest level of protective management. I fully support Alternative E with the improvements listed above.	ALT05-Alternative E	Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument, to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations. The Proposed Plan includes management zones with specific direction for each regarding motorized use. See the Proposed Plan in the Vegetation section. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. In the Proposed Plan, agencies would conduct comprehensive monitoring to track water quality conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
1933-2	Mark Slovak		Alternative E should also be modified to prohibit mechanical treatments which have been studied to primarily benefit only livestock forage	ALT05-Alternative E	See the Proposed Plan in the Vegetation section. The Proposed Plan says that vegetation management would include all available tools, including mechanical methods, consistent with the protection of BENM objects. No chaining would be allowed and light-on-the-land techniques would be used where practicable.
1945-1	Michael King		If improved, I can support Alternative E for the Bears Ears Management Plan. The improvements needed are: A) closure to off road vehicles, especially in the most sensitive areas of the Monument B) monitoring and stopping improper grazing activities, C) stopping new water developments, D) banning livestock from permanent surface water and riparian zones, E) banning mechanized vegetation management, and F) banning target shooting. These improvements are consistent with the Proclamation that established the Monument and are necessary for protecting the Monument into the future.	ALT05-Alternative E	The Proposed Plan in the Livestock Grazing and Water Resources sections include management actions for the protection of water resources. All BLM permits include the following stipulation: Grazing management practices will comply with Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah (1997). This is very similar to what is included in Appendix G. These BMPs protect objects. Included in the Livestock Grazing section in Chapter 2 is the agencies would prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments, to protect BENM objects. The Proposed Plan includes prioritizing six allotments for the completion of NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals. Under all alternatives, the agencies would "manage livestock grazing, subject to appropriate terms and conditions, in a manner consistent with the protection of BENM objects, including during periods of drought" (Management Actions Common to All Alternatives) See the Livestock Grazing section of the Draft RMP/EIS for more information regarding grazing management. The Vegetation section of the Proposed Plan states that under Alternative E, mechanical methods for vegetation management would be used only when necessary to protect BENM objects. The Proposed Plan in the Livestock Grazing and Water Resources sections include management actions for the protection of water resources. Travel management planning to designate the status of specific travel routes will be done as implementation level planning. Target shooting would be prohibited under Alternative E.
3814-2	Andrew Ashburn		Improper grazing has caused, and continues to cause, significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan must require all agencies to immediately comply with environmental, biological and anthropological assessments and prohibit regional water development. You must prohibit non-native livestock from reaching perennial surface water, riparian habitat, and natural springs.	ALT05-Alternative E	The Proposed Plan include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only, unless a current (within the last 10 years) land health assessment has been completed.
5548-1	John Kretschman		Providing my support for an improved Alternative E for Bears Ears Nat'l Monument. This monument is one of the best in the western USA My most recent visit was during May 2022 with San Diego friends. After spending several full days in the area, we feel much more is needed to protect it's natural beauty for future generations. Following points must be acted upon and adopted:: Closure of Arch Canyon to motorized use Zoned approach to recreation and visitation Make substantial efforts to reverse the ongoing damage to cultural sites, native vegetation, water quality and quantity, riparian and soils. Emphasize traditional Indigenous knowledge and techniques and natural processes for vegetation management	ALT05-Alternative E	The Proposed Plan manages motorized access to Arch Canyon by a permit system. During implementation level planning agencies may apply additional limitations including, but not limited to, type of vehicle, season of use, or timing restrictions. The Proposed Plan employs a zoned approach to recreation management as described in Appendix E. Section 2.4.8 Forestry and Woodlands and 2.4.7 Vegetation provide management direction to incorporate traditional indigenous knowledge into those resources management.
8014-3	Joseph LaCavera		Alternative E should also prohibit mechanical treatments and commercial timber harvest.	ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
8425-1	Kate Autoue		As an avid backpacker and recreationalist I am in support of Alternative E management plan; although, I believe the travel and transportation management should reflect more of Alternative D's approach.	ALT05-Alternative E	See the Proposed Plan in the Travel and Transportation Management section.
9060-1	Diana Bohn		Alternative E, enhanced by elements from the conservation-focused Alternative D and the Bears Ears Inter-Tribal Coalition Land Use Plan, offers the best path forward. This approach not only prioritizes the protection of the Bears Ears landscape, but also honors the Bears Ears Inter-Tribal Coalition which led the effort to designate this National Monument and their vision for holistic care and grazing reform that is rooted in Indigenous knowledge and techniques. This plan represents a rare and significant opportunity to redefine public lands management, particularly in relation to livestock grazing.	ALT05-Alternative E	Thank you for your comment. The Proposed Plan is based on Alternative E with a combination of components from the various action alternatives. The Proposed Plan was developed in collaboration with the BEC and based on consideration of public comments on the Draft RMP/EIS, input from cooperating agencies, Tribal Nations, and government-to-government consultation.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
9071-1	Utah supporter of BENM		Please strengthen Alternative E to ensure that BENM objects will receive much needed protection. Please apply the law and best available scientific information in developing strong and specific decisions for the final BENM plan. Please limit the discretion of managers and ensure that the success in implementing plan decisions can be objectively monitored.	ALT05-Alternative E	Proclamations 9558 and 10285 require the protection of BENM objects. This is incorporated into the Proposed Plan in the Overarching Management section.
9188-2	Nike Stevens		I support adoption of Alternative E including the withdrawal of John's Canyon (which is an important desert bighorn sheep habitat) from grazing and the closure of Arch Canyon to motorized use.	ALT05-Alternative E	The Proposed Plan manages motorized access to Arch Canyon by a permit system. During implementation level planning agencies may apply additional limitations including, but not limited to, type of vehicle, season of use, or timing restrictions
F14-1			We ask you to strengthen the management plan to protect natural areas in a way that also allows the ongoing Indigenous access and use of these areas by: – Improving grazing management by requiring resource assessments and livestock monitoring, encouraging retirement of grazing allotments, and by protecting riparian areas, seeps, and springs from grazing impacts. – Expanding off-road vehicle closures to protect sensitive wildlands and resources. – Prohibiting mechanical vegetation treatments, protecting old-growth trees, and requiring the use of native seeds for restoration projects. – Ensuring the plan provides a holistic approach to wildlife management and the impacts of climate change. – Ensuring that the final plan provides stronger protections and treatment for endangered prehistoric architecture and all places of cultural importance. Please select Alternative E, with modifications, as the final Bears Ears National Monument management plan to help ensure sustainable management of this magnificent landscape for future generations.	ALT05-Alternative E	Thank you for your comment. Please see the Proposed Plan for management actions regarding the resources listed in the comment.
F2-4			We urge you to adopt Alternative E, emphasizing the following: 1. Focusing use and development in existing developed areas. Please give STRONG protections to more remote, fragile locations, wildlife habitat and migration corridors, cultural sites and resources, and backcountry areas where we can backpack in quiet and solitude. 2. Closing Arch Canyon to motorized activity. This is an important riparian area with sensitive plant and wildlife species and cultural resources. 3. Giving all lands with wilderness characteristics the strongest possible permanent protection.	ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management which aims to concentrate facilities and uses to certain areas to meet zone objectives as further described in Appendix E. The Proposed Plan manages motorized access to Arch Canyon by a permit system. During implementation level planning agencies may apply additional limitations including, but not limited to, type of vehicle, season of use, or timing restrictions. See the Proposed Plan for management actions regarding wildlife habitat, cultural resources, and recreation, and lands with wilderness characteristics.
17195-7	Terry Camp 9865 State St. Sandy, UT 84070	Utah Farm Bureau Federation	The UFBF is also concerned about the significant portions of BENM proposed to be managed as LWCs and ACECs. The preferred alternative proposes to manage 126,296 acres as ACECs and another 419,128 acres as protected LWC. The UFBF opposes designating large tracts of land ACECs. The UFBF believes ACECs should be small in size, allow continued grazing, and should be consistent with the county and state resource management plans. Restrictive special designations hamper the BLM and USFS ability to actively manage our federal lands. The BLM and USFS should be working to ensure that federal lands can be accessed to improve the environment and avoid putting human lives and livelihoods at risk.	ALT05-Alternative E, ACEC01-General	See the Proposed Plan in the Special Designation section, the Proposed Plan includes changes to ACEC designations. Based on input from public comments and cooperating agencies, and Tribal Nations the amount of ACEC acreage has been reduced from the preferred alternative. Also, see changes to the Proposed Plan in the Lands with Wilderness Characteristics section. Grazing is generally not prohibited in BLM WSAs, LWC, or ACECs, but new grazing-related developments and actions may not be allowed if they don't meet the management prescriptions for those areas. Lavender Mesa ACEC is designated as unavailable to grazing but is not currently grazed under current management.
17617-2	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	The Bears Ears Partnership has identified specific improvements and comments to Alternative E that we believe are necessary to meet FLPMA and the Public Lands Rule standards. These include: We request the same management change [from avoidance to exclusion, added for clarity] for the Lavender Mesa ACEC and Shay Canyon ACEC. Alternative E proposes mere avoidance for these ACECs, and we do not feel it adequately protects the relevant values BLM should clarify the criteria an applicant has to satisfy to request a ROW within an avoidance area. BLM should also clarify what it means for there to be no reasonably necessary route outside the area. (DEIS 2-73) We request that all new ROW grants in ROW avoidance areas be evaluated in consultation with BEC BLM proposes to continue allowing OHV use on designated routes in the San Juan River ACEC, Shay Canyon ACEC, and Valley of the Gods ACEC. These should be closed, as the use of OHVs on designated routes can still impair the relevant and important values of these ACEC, including disturbing their natural quiet and visual qualities and harassing wildlife	ALT05-Alternative E, ACEC01-General	See the Proposed Plan in the Special Designation section. Lavender Mesa ACEC and Shay Canyon ACEC are both ROW avoidance under the Proposed Plan. Under the Proposed Plan in the Lands and Realty section, the agencies have clarified the criteria to request a ROW or SUP in an avoidance area. As discussed in the Overarching Management section, the agencies will collaborate with the BEC on site-specific implementation-level management that follows this plan. Travel management planning, which will designate specific routes, will be completed as part of implementation-level planning.
17646-1	Martha Ham Leeds, UT 84746		- Incorporate the more expansive Aquifer Protection ACEC designation outlined in Alternative D.	ALT05-Alternative E, ACEC01-General	All ACECs listed in Alternative E, with the exception of John's Canyon ACEC, would be designated under the Proposed Plan.
18610-1	Kate Mabry		Oppose the designation of New Areas of Critical Environmental Concern as that could restrict the use of and/or possibly result in closures in almost one million acres to the public.	ALT05-Alternative E, ACEC01-General	See the Proposed Plan in the Special Designation section, the Proposed Plan includes changes to ACEC designations. Based on input from public comments and cooperating agencies, and Tribal Nations the amount of ACEC acreage has been reduced from the preferred alternative.
9127-6	Adam Auerbach		Designation of Areas of Critical Environmental Concern (ACEC): Encourage the agencies to designate all the ACECs proposed in Alternative E, especially the large Aquifer Protection ACEC. Protecting healthy landscapes in these ACECs is more effective than attempting to restore degraded ones.	ALT05-Alternative E, ACEC01-General	All ACECs listed in Alternative E, with the exception of John's Canyon ACEC, would be designated under the Proposed Plan.
3125-26	Steve Knox		Page 2-39, 2.4.10, Special Designations, Table 2-9, 2008 Monticello RMP, Valley of the Gods ACEC action, Alternative E A part of the Valley of the Gods ACEC includes lands with wilderness characteristics (LWC) proposed for protection under Alternative E. Limited OHV designation and vegetation treatments (if motorized and/or mechanized) would not be appropriate in areas managed for their wilderness characteristics. These parts of the management prescription should be removed from the prescription of the ACEC.	ALT05-Alternative E, ACEC02-Existing ACECs	In areas where such special designations overlap, the designation with the greatest degree of protection will take precedence over the other and the land within that overlap will be managed according to the management listed under the more protective designation. LWC would be managed as OHV limited under Alternatives A, B, and E, and under all alternatives, vegetation improvements would be permitted "if beneficial or non-impairing to wilderness characteristics". For more information on LWC management, see the associated section of the Draft RMP/EIS.

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18238-36	Chaitna Sinha		We propose: The management prescriptions for Johns Canyon ACEC include language that specifically requires it to be managed so as not to impair areas suitability for designation as wilderness and only allow vegetation management, OHV use, and surface disturbance as appropriate for a WSA. Grazing should be prohibited because it is inconsistent with protecting the relevant and important values for which the ACEC was nominated.	ALT05-Alternative E, ACEC03-Nominated ACECs, GRAZ01-General	John's Canyon is not carried forward as an ACEC under the Proposed Plan, yet the John's Canyon Pasture in the Perkins South Allotment is made unavailable to livestock grazing in the Proposed Plan.
18238-81	Chaitna Sinha		We propose: To ensure protection of clean air in mandatory Class I and II areas under the Clean Air Act, Alternative E should include the following from Alternative A: Manage all BLM and BLM-authorized activities to maintain air quality to meet Prevention of Significant Deterioration Class II standards and protect the Class I airshed of the national parks (e.g., Arches and Canyonlands National Parks). Id., p. 2-68.	ALT05-Alternative E, AIR01-General	Prevention of Significant Deterioration (PSD) is a permitting function which is managed by the State of Utah. The agencies do not have the authority to manage permitted sources under PSD. The goals and objective for BENM are there to protect air quality within BENM which would be similar air quality benefits to PSD.
18923-6			Ultimately, the aims of the tribe seem to be greatly focused on their religious beliefs. Federal agencies are only required to not impede on their religious practices. Federal agencies are also required to consider the interests of the public at large, thus Alternatives D and E are inappropriate as they give preference to religious understandings of a landscape that are not clearly defined and to which the ends of their stated management goals are vague and ambiguous at best. That said, enhanced interpretation, in the way of signage and kiosks, which raise awareness of these cultural/religious values of the tribes amongst visitors to the monument are a reasonable thing to do in the context of current land management policies, practices, and guidance for the BLM.	ALT05-Alternative E, ALT04-Alternative D	Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. Traditional Ecological Knowledge, just as Western Science, is simply a method for generating knowledge. As stated in the Traditional Indigenous Knowledge section it is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives. This RMP/EIS informs the decision of how Traditional Indigenous and Ecological Knowledge would be incorporated in management of the Monument; incorporation of Traditional Indigenous and Ecological Knowledge in implementation level projects will be analyzed in site-specific NEPA. The agencies maintain final decision making authority.
596-2	Utah taxpayer		I believe that Alternative E would provide the necessary level of protection while also anticipating the worsening effects from climate change. The natural and culture resources in BENM will be subject to more extreme future weather events. BLM cannot control these events. But BLM can control the human land uses that may add to the environmental stresses from those events. Climate resilience is therefore important and this means that human impacts should be greatly reduced. Please review the attached IPCC report on the overwhelming international consensus on the increasing severity of the climate crisis. This consensus is relevant and should be factored into this BENM planning process. Rapid environmental changes are already underway and are likely to accelerate in speed and scope. The new BENM plan should be proactive so that BENM resources have the best chance to successfully adapt to those changes.	ALT05-Alternative E, CC01-General	The Climate Change section in Chapter 3 has been updated to incorporate the most recent science from IPCC Synthesis Report (2023; https://www.ipcc.ch/report/sixth-assessment-report-cycle/).
7958-1			The methane gas released into the air as a result of grazing (according to the BENM Draft Resource Management Plan) "is the primary source of impacts to climate change." Yet the Preferred Alternative E still leaves 88% of the monument open to grazing (1,194,529 acres). This needs to be reconsidered as the draft plan does almost nothing to reduce climate change. In light of the new "Public Lands Rule" which specifically states that mitigation of climate change must be on an equal footing to impactful uses such as grazing, the BLM needs to readdress this. The BLM's own press release (April 18, 2024) states: "As stewards of America's public lands, the Interior Department takes seriously our role in helping bolster landscape resilience in the face of worsening climate change." I see no evidence of this in your draft plan.	ALT05-Alternative E, CC01-General	See the Proposed Plan for livestock grazing management actions. See the Climate Change section for a discussion of impacts on livestock grazing to climate change regarding methane gas emissions.
18082-52	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS states, The primary difference in GHG emissions by alternative would be due to differences in livestock grazing AUMs. GHG emissions from other sources, such as vegetation treatments, prescribed fires, and travel management, are not expected to vary substantially across the alternatives. In addition, their contributions toward total annual CO2e emissions would be small compared with those estimated from livestock grazing AUMs under both the 100-year and 20-year time horizons. (p. 3-466). We note that the AUMs and HMs under the No Action Alternative are the same as under the Preferred Alternative (p. 3-471). In 2021 the Biden Administration released a commitment to a whole-of-government approach to reducing GHG emissions 50-52% below 2005 levels by 2030.20 Additionally, Section IV(B) of the Interim Guidance states, agencies should explain how the proposed action and alternatives would help meet or detract from achieving relevant climate action goals and commitments, including Federal goals, international agreements, state or regional goals, Tribal goals, agency-specific goals, or others as appropriate. Since 2030 is during the life of the RMP, we recommend assessing in the Final EIS how the chosen alternative will help meet or detract from the Administration's GHG emissions reduction goal. We note the Draft EIS states that, Under Alternative D, 56,347 AUMs and 7,908 HMs would be permitted, resulting in 12% fewer emissions from enteric fermentation of livestock than Alternative A (p. 3-470). We recommend the chosen alternative in the Final EIS incorporate specific reductions in AUMs and HMs to help meet climate goals.	ALT05-Alternative E, CC02-Greenhouse Gas (GHG) emissions	Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528-531), the agencies manage to sustain the multiple use of their renewable resources in perpetuity while maintaining the long-term health and productivity of the land. This law does not prioritize one resource over another by default, but instead considers how management actions provide for a balance of resource and human needs. The Livestock Grazing section provides AUMs and HMs across all alternatives which are then analyzed for impacts including for greenhouse gas emissions in Livestock Grazing and Climate Change.
1574-1	Karen Naiman Denver, CO 80247-3020		Regarding the draft Bears Ears Management Plan, I support an improved Alternative E, because it best aligns with the Proclamation establishing the Monument, and will ensure that this landscape is managed in collaboration with the 5 Tribes of the Bears Ears Commission for the long-term protection of, and respect for, its natural, spiritual, cultural, and historical values and resources.	ALT05-Alternative E, CUL01-General	Thank you for your comment. The Proposed Plan emphasizes collaboration with the BEC and Tribal Nations

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
1575-1	Steven Glow, MT 59831		I am writing today regarding the draft Bears Ears Management Plan. I support an improved Alternative E because it best aligns with the Proclamation establishing the Monument, and will ensure that this landscape is managed in collaboration with the five Tribes of the Bears Ears Commission for the long-term protection of, and respect for, its natural, spiritual, cultural, and historical values and resources.	ALT05-Alternative E, CUL01-General	Thank you for your comment. The Proposed Plan emphasizes collaboration with the BEC and Tribal Nations
18238-43	Chaitna Sinha		We propose: Because other areas of the plan allocate resource uses and activities that affect cultural resources, in order to best honor the Proclamations and the objects and values for which the monument is designated, components of Alternative D and other alternatives including, but not limited to, the following should be adopted in the final plan: ...allocate 202,585 acres (359,201 acres total) as unavailable/not suitable for livestock grazing in the following areas and/or pastures; modify any existing term grazing permits, as applicable (Appendix A, Figure 2-45, Alternative D, grazing and trailing). DEIS, Vol. 1., p. 2-125, Table 2-21. Adopt the Aquifer Protection ACEC (1,012,371 acres) as found in Alternative D to minimize surface disturbance and maximally protect intact cultural resources. DEIS, Vol. 1, p. 2-40, Table 2-9. Adopt the Travel and Transportation Management prescriptions detailed in Alternative D, including Open to OHV use: 0 acre, OHV limited: 381,239 acres, Closed to OHV use: 982,914 (Appendix A, Figure 2-36, Alternative D, off-highway vehicle area designation) DEIS, Vol. 1, p.2-216, Table 2-20. 62	ALT05-Alternative E, CUL01-General	See Proposed Plan for changes to the Livestock Grazing section, Special Designations section, and Travel and Transportation Management section.
18238-84	Chaitna Sinha		With this in mind, the entirety of the management plan for Bears Ears is a cultural resources plan. That is why the deep, detailed, and determined engagement of the BEC in preparation of the CRMP is so important. We propose: Adopt Alternative E for cultural resources, including preparing a CRMP in close collaboration with the BEC within two years for the final plan decision. It is also essential that the final plan includes maximally protective components from other issue areas, as detailed in these comments, because as the Proclamations, the tribes (in the BEITC Plan), and the DEIS make clear, there is no distinction between natural and cultural resources and values.	ALT05-Alternative E, CUL01-General	See the Proposed Plan under the Cultural Resources. A CRMP, developed in collaboration with BEC and Tribal Nations, would be required under the Proposed Plan.
18254-2	Katie Pappas		Developed with the five tribes of the Bears Ears Commission, Alternative E best honors the monument proclamations and maximizes the use of Traditional Indigenous Knowledge and Traditional Ecological Knowledge. Out of respect for tribes and their connection to this land, you should make some modifications to this alternative that prevent further destruction of landscapes resulting from clear cutting, inappropriate grazing and use of off road vehicles and other damaging recreation in sensitive areas. Too much damage has already been allowed. It must not continue. Every effort should be made to preserve habitat for wildlife and birds, protect streams and prevent further damage to cultural sites.	ALT05-Alternative E, CUL01-General	The Proposed Plan has been developed in collaboration with the BEC and Tribal Nations. See also Livestock Grazing section, Forestry and Woodlands section, and Wildlife and Fisheries section for changes to the Proposed Plan.
18302-6	Joe Jones		Derogatory names of places and objects in the Monument must be removed.	ALT05-Alternative E, CUL01-General	The Proposed Plan would address derogatory names through the Co-Stewardship implementation level plan, developed in collaboration with the BEC and other Tribal Nations. Changing the geographic names of natural features, as opposed to the names of agency-designated areas, is a function of the U.S. Board on Geographic Names.
18668-4	Vanessa Soncco		Funding should be allocated for projects involving cultural education services for Tribes to develop curriculum and educational materials. Funding should be allocated to developing Tribal ranger initiatives as an alternative to enforcement services from the Federal agencies	ALT05-Alternative E, CUL01-General	See the Cross Cultural Education and Outreach provided in section, which includes a cultural ranger program in partnership with the BEC.
8992-2	Olivia Juarez 1919 14th St, Suite 700 Boulder, CO 80302	GreenLatinos	We support Alternative Es approach to Cross Cultural Education and Outreach to develop an interpretive plan specific to the Cedar Mesa area through Special Recreation Permits and off-site means for the entire Cedar Mesa area. The interpretive plan should include interpretation about the history of trade between Mesoamericans and Ancestral Puebloans in Cedar Mesa off-site at a visitors center or at other frontcountry interpretation sites in Cedar Mesa. The Edge of the Cedars State Park Museum manages a collection of items that came from within BENM boundaries before monument designation. These items include macaw feathers and a macaw feather sash which were collected from Grand Gulch. These items are of special import to U.S. Latino history, as they tell of the historic connection that Mesoamericans (the ancestors of many Latino/a/e peoples today) had with the monument area and Ancestral Puebloans. Trade between Ancestral Puebloans and Mesoamericans explain how the feathers ended up in Grand Gulch. Since these items were originally found within the monument area, we encourage partnership with the Edge of the Cedars State Park to interpret the objects connection to BENM, and storytelling about these objects at interpretative sites within the monument. This is an especially grand opportunity to recognize a cultural history that will deeply resonate with Latinos and ensure that Latino cultural connections to the region are remembered as a part of American history.	ALT05-Alternative E, CUL01-General	See the Proposed Plan in the Cross Cultural Education and Outreach section. The Proposed Plan includes collaborating with the BEC and Tribal Nations on interpretation in BENM and emphasis on highlighting landscape connections.
17195-3	Terry Camp 9865 State St. Sandy, UT 84070	Utah Farm Bureau Federation	Furthermore, as agriculture and grazing have a long-established history and heritage in San Juan County and the lands within BENM, the UFBF urges the BLM and USFS to recognize and preserve these lands as grazing-related Traditional Cultural Properties. A Traditional Cultural Property is a property eligible for inclusion in the National Register of Historic Places because of its association with cultural practices or beliefs of a living community that (a) are rooted in a communitys history, and (b) are important in maintaining the continuing cultural identity of the community. Pursuant to the requirements found in 54 U.S.C. 306108, the UFBF requests that the BLM and USFS thoroughly	ALT05-Alternative E, CUL02-Traditional, Religious, or Cultural Use	The agencies do not have sufficient information to begin evaluating lands used for livestock grazing as a TCP. The agencies do not have a delineated tangible area or property to be evaluated as a TCP. Accordingly, the agencies are not able to evaluate livestock grazing as a TCP in accordance with Section 106 at this time. Further, there is no identified single community or group that are associated with, and value the traditional practice of grazing (see National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties). Additionally, the Proposed Plan retain approximately 97% of BENM lands that are currently available. Please see the livestock grazing section of chapter 3 for

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			analyze the effect of each of the alternatives found in the DRMP on historic grazing allotments and seek ways to avoid, minimize, or mitigate adverse effects to grazing allotments and ranching operations.		analysis of the Proposed Plan impacts. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.
17963-3	Sierra Nelson		The UWGA urges the BLM and USFS to protect grazing as a cultural and economic asset. Recognizing grazing-related lands as Traditional Cultural Properties could help preserve this vital activity. Grazing also benefits landscape health, aiding in fire suppression, invasive species control, and wildlife habitat improvement.	ALT05-Alternative E, CUL02-Traditional, Religious, or Cultural Use	See the Grazing section for impacts from grazing, including potentially beneficial impacts.
18238-6	Chaitna Sinha		it is important to include cultural and traditional purposes in the allowance of riparian woody harvest. We propose: Add the following components from Alternative A (underlined) to Alternative E: Excluded from private and/or commercial use of wood products, except for Tribal Nations cultural and traditional purposes as determined on a site-specific basis, and where inconsistent with the Religious Freedom Restoration Act and other applicable laws. Private collection of wood products would not be prohibited where such prohibition constitutes a substantial burden on religious practices. [see letter for emphasis]	ALT05-Alternative E, CUL02-Traditional, Religious, or Cultural Use, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Proposed Plan would be available for wood product harvest in accordance with applicable law. See the Forestry and Woodlands section of the Proposed Plan which includes management actions that allow for the traditional collection of cottonwoods and willows.
16370-3	Wayne Hoskisson		Essentially I agree that Alternative E which reflects the management direction recommended by the Bears Ears Intertribal Commission, the Bureau of Land Management, and the National Forest Service is a reasonable starting point for the final RMP but recording from the Southern Utah Wilderness Association Ethics et al are essential changes that would enhance management.	ALT05-Alternative E, DATA03-Suggest Additional Data Source	Thank you for the comment. There were no attachments provided to the comment. The agencies have considered all comments provided during the comment period.
18556-2	Stan		The preferred alternative ignores comments already given to the BLM by the public. The BLM stated Several commenters suggested the agencies consider and analyze increasing motorized access in BENM. Even though this is not possible, the BLM should take these comments into account by preserving existing roads including Arch Canyon Road.	ALT05-Alternative E, DATA06-Alternatives Considered but Dismissed from Detailed Analysis	Under the Proposed Plan, motorized and non-motorized use in Arch Canyon would be allowed with a permit. This permit system would allow access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
14767-149	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under Alt E, which the BLM will not choose, we see: If monitoring determines that a permitted activity is a causal factor in riparian areas functional-at risk or nonfunctional, steps would be taken on a case-by-case basis to mitigate the impacts of that activity or temporarily restrict the activity, or, if necessary, the riparian area would be closed seasonally to that activity to provide for rest, restoration, and maintenance of riparian area PFC. In those cases where there are closures, those closures would be lifted if changes in the permitted activity provide for restoration and maintenance of riparian area PFC. Time periods for closure would be determined in collaboration with the BEC. What if, like has been the case up till now, the BLM fails to monitor? Then its automatic that this does not apply. In the unlikely case the BLM does monitor, what if the monitoring is not designed to assess the appropriate parameters? Then its automatic that this does not apply. What if the monitoring is not designed to attribute causality? Then its automatic that this does not apply. We have already discussed above the fact that the level of PFC as defined in the BLM manual is far below the level needed to either protect or restore objects. So you combine all these loopholes and the result is that the above may fool a casual, ignorant reader to think the BLM is doing its job, but for all the ink, practically speaking, its meaningless.	ALT05-Alternative E, DEC104-Mitigation and Monitoring	Under the Proposed Plan, agencies would conduct comprehensive monitoring to track water quality conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects. Additionally, the BLM plans to continue AIM monitoring across the Monument to understand watershed health. See the Water Resources section in Chapter 3 for additional details on AIM Monitoring. FS National Watershed Condition Framework assesses the condition of watersheds that intersect NFS lands. Priority watersheds are identified using the Watershed Condition Framework to focus on maintaining or improving watershed condition every 5 years (or sooner if needed).
17963-1	Sierra Nelson		Antiquities Act Concerns The Antiquities Act of 1906 allows the President to designate national monuments but should be confined to the smallest area necessary. We believe that a 1.36-million-acre designation for BENM does not align with this principle. Such a decision lacks the transparent public process expected today.	ALT05-Alternative E, DEC107-Compliance with other laws and policies	Modification of the Antiquities Act or proclaimed size and boundaries of the declared BENM are out of the scope of this RMP.
18657-22	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The overarching principle of Alternative E is to take native American religious beliefs (what the RMP euphemistically calls traditional indigenous knowledge) and turn them into federal policy. Alternative E constitutes nothing less than the wholesale establishment of a state religion (at least for the purposes of this monument) in abject violation of the First Amendment.	ALT05-Alternative E, DEC107-Compliance with other laws and policies	The Proposed Plan complies with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
17195-4	Terry Camp 9865 State St. Sandy, UT 84070	Utah Farm Bureau Federation	Grazing not only contributes to the history and culture of the region, but it also contributes economically. Agriculture is a key component of the economy in San Juan County. In 2022, cash receipts for livestock production generated more than \$15 million in San Juan County. Notably, the agricultural industry also accounts for 10.5% of all employment in San Juan County. Grazing on public lands produces a multiplier effect as ranchers hire employees, make loan payments, buy supplies from local retailers, and engage in many other types of commercial activities. Any reduction in grazing access would not only threaten the livelihoods of ranchers but also have ripple effects throughout surrounding rural economies.	ALT05-Alternative E, EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in Section 3.5.5.2. Environmental Consequences, under the subheaders for Economic Contributions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in Section 3.5.5.2. Environmental Consequences, under the subheaders for Social Conditions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17963-2	Sierra Nelson		Grazing Restrictions The DRMPs preferred alternative would prohibit grazing on 169,529 acres of BENM and restrict new water development for livestock. These limitations contradict the historic importance of grazing in the area, as cited in the Proclamation. Grazing is integral to the local culture and economy, contributing over \$15 million to San Juan County's economy and accounting for 10.5% of employment.	ALT05-Alternative E, EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values section for Environmental Consequences, under the subheaders for Economic Contributions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in Environmental Justice and Social and Economic Values section for Environmental Consequences, under the subheaders for Social Conditions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative.
17573-108	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	ES-4.6 Alternative E On page ES-10 the plan states, "Fire management: Under Alternative E, the most environmental protection measures would be employed to maximize protection of cultural resources, while also protecting natural resources. Fire and fuel management would prioritize natural processes and incorporate Traditional Indigenous Knowledge. The fuels treatments would give precedence to the protection of culturally significant sites. Mechanical treatments would only be used to protect BENM objects. FFSL deems mechanical treatments in WUI areas in the best interest of protecting public safety and property. In addition, fuel and vegetation treatments in areas with motorized access, high visitation, and developed recreation facilities should be considered to reduce fire risk and protect human health and safety.	ALT05-Alternative E, FIRE01-General	The Vegetation section of the Proposed Plan includes management actions that would allow for use of all available tools, including mechanical methods, except for chaining, consistent with protection of BENM objects. Additionally, areas of high value/high risk would be identified and fuels treatments would be prioritized in those areas.
15555-4	Mary Moran 1991 Highland Dr Moab, UT 84532		So I strongly believe that mechanical Pinyon-Juniper treatments (chaining, etc.) should be prohibited. The treatments not only remove trees, but they wipe out any understory plants and severely damage both the underlying soils and biological soil crusts.	ALT05-Alternative E, FOREST01-General	The range of alternatives analyzed in the EIS include varying levels of vegetation management and methods (Fire Management and Vegetation sections in Chapter 2). Prior to approval of any site-specific proposals for vegetation treatment, the BLM and USDA Forest Service would perform any necessary environmental analysis and reviews, including a determination of whether the activity is consistent with the proper care and management of BENM objects and values. This evaluation would include cultural resource surveys, impacts analyses, and identification of any applicable mitigation actions, which may include altering prescribed treatment methods or the location of treatments. No chaining would be allowed in the Proposed Plan.
9253-4	Stephen Trimble P.O. Box 750090 Torrey, UT 84775		Pion-juniper chaining and mastication do not improve habitat for endangered and threatened species. Destroying forest is terrible for p-j species like the threatened Pinyon Jay. Treatment also can damage sensitive resources and cultural sites. Alternative E should prohibit mechanical treatments and commercial timber harvest and require the use of native seeds for revegetation and reclamation.	ALT05-Alternative E, FOREST01-General	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management. The range of alternatives analyzed in the EIS include varying levels of vegetation management and methods (see Fire Management and Vegetation sections). Prior to approval of any site-specific proposals for vegetation treatment, the BLM and USDA Forest Service would perform any necessary environmental analysis and reviews, including a determination of whether the activity is consistent with the proper care and management of BENM objects and values. This evaluation would include cultural resource surveys, impacts analyses, and identification of any applicable mitigation actions, which may include altering prescribed treatment methods or the location of treatments.
10347-1	Gail Williams		Key protections that fit into the intent of ALTERNATIVE E include better aligning management of the forest and plants, including banning clearcutting, strict enforcement of native seeds only for land restoration, and identifying and protecting remaining old-growth trees.	ALT05-Alternative E, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	Under the Proposed Plan, clearcutting for timber harvest would be prohibited (Forestry and Woodlands section); priority would be on the use of native seed for restoration based on availability, adaptation, and probability of success (Vegetation section); and agencies, in collaboration with the BEC, maintain and/or promote continued health, diversity, and resiliency of forest structural stages, including old growth (Section Forestry and Woodlands section).
18238-28	Chaitna Sinha		We propose: The following additions to Alternative E from Alternatives A-D (underlined), and other necessary changes (in bold). Agencies will collaborate with the BEC and Tribal Nations to identify specific areas within BENM that would be open or closed to wood product harvest permanently or on a seasonal or multiyear basis to allow for resource rest. All wilderness, wilderness study areas (WSAs), Research Natural Areas, ACECs, and the Canyon Rims Special Recreation Management Area (SRMA) will be closed to wood product harvest unless research indicated that wood product harvest will protect and enhance Monument objects and values. Wood product harvest in these areas will only be allowed if approved by the BEC. Acreage closed to wood product harvest (unless deemed necessary for the protection of BENM objects as determined in collaboration with the BEC): 433,148. [see letter for emphasis]	ALT05-Alternative E, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The locations open and closed to wood product harvest are analyzed within the range of alternatives. Areas closed to wood product harvest in the plan are designated wilderness, WSAs, RNAs, Dark Canyon and Indian Creek Management Areas, the eastern rim of Indian Creek. livestock/wildlife exclosures, cultural sites and developed recreation sites. In the Proposed Plan, agencies in collaboration with the BEC can close or place restrictions on the areas that are available for wood product harvest on a seasonal or multiyear basis through implementation level planning.
9287-1	Vaughn Hadenfeldt		Wood gathering and its off-road effects need tighter control including better enforcement of rules that already exist.	ALT05-Alternative E, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	Under the Proposed Plan, cross-country OHV travel for wood product harvest would not be allowed. This RMP/EIS informs the decision of how the Monument will be managed. Enforcement of that management is beyond the scope of this EIS.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
9331-3	Daren Cornforth		I support Alternative Es emphasis on tribal knowledge for vegetation management. To protect sensitive resources and cultural sites, I support prohibition of commercial timber harvest or mechanical tree thinning, and require the use of native seeds for revegetation and reclamation.	ALT05-Alternative E, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The range of alternatives analyzed in the RMP/EIS include varying levels of vegetation management and methods (Fire Management and Vegetation sections). Prior to approval of any site-specific proposals for vegetation treatment, the BLM and USDA Forest Service would perform any necessary environmental analysis and reviews, including a determination of whether the activity is consistent with the proper care and management of BENM objects and values. This evaluation would include cultural resource surveys, impacts analyses, and identification of any applicable mitigation actions, which may include altering prescribed treatment methods or the location of treatments.
10347-2	Gail Williams		Please set grazing utilization levels at a lower threshold such as 25-35% and monitor for five years. This should let us all know if more or fewer cattle or sheep are appropriate.	ALT05-Alternative E, GRAZ01-General	As outlined in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this /EIS assessing appropriate utilization levels and baselines.
10751-2	Michelle Sewald		The Bears Ears Inter-Tribal Coalition Land Use Plan advises that cattle "be cared for properly so they dont destroy the land." Request that Alternative E incorporate language requiring range riders to move cattle daily to prevent over-concentration in sensitive areas, particularly springs, and eliminate fences and livestock watering installations where possible. Please also advocate for the grazing closures represented in Alternative D.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Routine management of livestock includes the use of "cowboys" or "range riders" to distribute livestock, maintain range improvements, and other duties associated with livestock management. Requiring this is outside the scope of this Plan. The Proposed Plan in the Livestock Grazing section prohibits new range improvements or modifying range improvements unless the primary purpose is project BENM objects. The Proposed Plan includes additional acres as unavailable to grazing
10857-6	Shawn Ivins		As a rancher in the area, I can assert that virtually every range improvement is done to protect resources and objects on the land. That being said, there is very destructive wording under Alternative E about water source development. Alternative E states, Prohibit new water source development for domestic livestock unless necessary to protect BENM objects. Existing water developments for livestock or wildlife would be removed unless they protect BENM objects, where feasible. This wording is very destructive to the proper management and protection of the land as the water developments are done for the protection of the range and resources. Without water developments, livestock are forced to congregate in concentrated areas and this can be more destructive than having livestock spread out. The wording in Alternative B is much more consistent with protecting resources and objects. Alternative B reads, Allow new water developments and modifications to existing water developments for livestock grazing purposes where needed to provide functional infrastructure for orderly administration and management of the rangelands and consistent with protecting BENM objects.	ALT05-Alternative E, GRAZ01-General	The agencies considered the comment suggestion. See the Management Actions by Alternative table of the Proposed Plan for management actions regarding range improvements and water developments. See the Livestock Grazing section in Chapter 3 and Appendix N for a discussion of impacts resulting from range improvement and water development management actions.
1195-3	Lee Stanfield		You must improve Alternative Es management of livestock grazing in the final plan by setting utilization levels at no more than 30% until you determine if a higher level of grazing is still protective of monument objects and values.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in Section Management Actions by Alternative table for Livestock Grazing, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
1273-3	Robin Poppen		At least initially, livestock grazing should be set at a maximum utilization level of 30% with an increase, or decrease, determined in the future based on best evidence documenting improvement or degradation of plant habitat.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
1293-3	Janet Kahan		Improve how the monument manages livestock grazing under Alternative E improve livestock grazing management by setting utilization levels at 30%, at least until land managers determine if a higher level of grazing can still be appropriate to protect monument objects and values. This will help ensure that monument objects and values are protected from overgrazing.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
13-1			While I support many positive aspects of BLMs preferred alternative, I am disappointed that it and all of the other action alternatives would not sufficiently reduce livestock grazing in BENM. Grazing clearly damages monument objects and resources. BLM continues to demonstrate its improper bias favoring ranchers. Grazing spreads cheatgrass that changes fuel loads and results in more devastating wildfires. Livestock destroy crucial biological soil crusts. Wells are drilled and aquifers depleted for livestock waters. Livestock compete with wildlife for limited forage and this gets worse during drought periods. Please revise the preferred alternative to greatly reduce livestock grazing in BENM.	ALT05-Alternative E, GRAZ01-General	See the Livestock Grazing section in Chapter 2:" Manage grazing to minimize or eliminate intrusion of invasive grass and plant species due to grazing-related activities" Section The Goals and Objectives listed in Chapter 2 and Appendix G include managing for the standards for rangeland health that includes soil stability and BSC as an indicator. As shown in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan prohibits water developments unless necessary to protect objects and no water wells without a ground water study. Livestock grazing impacts are disclosed in various sections throughout Chapter 3 including soils, fuels, water resources and wildlife. Utilization levels would take forage needs of wildlife into consideration.
1327-3	Seth Roseman		Please enhance Alternative E's management of livestock grazing in the final plan by setting utilization levels at 30% until it is determined that a higher level of grazing remains protective of monument objects and values.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
1383-2	southern Utah resident		Improve how the monument manages livestock grazing under Alternative E (see the relevant attachment on grazing adverse impacts) In the final plan, please improve livestock grazing management by setting utilization levels at 30%, at least until land managers determine if a higher level of grazing can still be appropriate to protect monument objects and values. This will help ensure that monument objects and values are protected from overgrazing. And do not approve ranchers' new wells for livestock waters as this may deplete aquifers and jeopardize crucial surface springs and seeps.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines. The Proposed Plan prohibits new range improvements or modifications to existing range improvements, for livestock grazing purposes, unless: • The primary purpose is to protect BENM objects; and • BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed. Also in the Water Resources section of Chapter 2, the Proposed Plan would not authorize new groundwater withdrawals or diversions unless necessary to ensure the protection of BENM objects and a hydrologic study would be required.
1512-3	Art Hanson		I strongly urge you to improve Alternative Es management of livestock grazing in the final plan by setting utilization levels at 30% until you determine if a higher level of grazing is still protective of monument objects and values.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
15334-7	Bailey Brennan	National Wildlife Federation	The agencies should adopt Alternative Es approach to grazing management with some modifications, ensuring grazing can continue in coordination with the BEC and consistent with Proclamation 10285. We support the agencies commitment to include the BEC and TIK in grazing management decisions under all alternatives. We urge the agency to adopt Alternative Es approach to grazing management as it is the most inclusive of Tribal and Indigenous interests and would require the agencies to coordinate with the BEC in decision making, including permit terms and conditions, monitoring, and the development of allotment management plans. We do suggest that the agency incorporate a process for regularly determining whether grazing is a use compatible with Monument object protections and include the BEC in this process. We also urge greater protections for riparian features, including seeps and springs.	ALT05-Alternative E, GRAZ01-General	As described in Management Actions Common to all Alternatives for Livestock Grazing, cooperation with the BEC, inclusion of Traditional Ecological Knowledge, and monitoring to determine protection of Monument objects are part of the analyzed range of alternatives and are included under the Proposed Plan. The Proposed Plan in the Livestock Grazing and Water resources sections include management actions for the protection of water resources.
15555-2	Mary Moran 1991 Highland Dr Moab, UT 84532		One aspect of alternative E that I would hope to see strengthened is the management of grazing. I first visited the Bears Ears region almost 40 years ago. I moved to Southeast Utah (Moab) just a few years later, and have lived here almost continuously since. I have been to the current monuments land many times, slept up high near the actual Bears Ears, walked up Arch Canyon, stopped to explore in the Indian Creek area on the way to Canyonlands many times, and car camped and explored Comb Ridge from the Butler Wash Road. But most of my visits have been backpacking, car camping and exploring in the Cedar Mesa area. The abundance of archeological sites on the land within the convoluted, beautiful, colorful and varied canyons is as sacred-feeling as Ive experienced	ALT05-Alternative E, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, including cultural sites. The range of alternatives for grazing management in the Draft RMP/EIS includes management that would reduce the amount of grazing allowed on BENM to protect Monument objects, and the Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section, has fewer acres available/suitable for grazing than currently (Alternative A). In addition, the Goals and Objectives listed in Chapter 2, and Appendix G

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			anywhere. The small staff that Ive encountered over the years, and more recent online information teaches visitors how to travel lightly, with the least impact on vegetation, soils, water, and cultural sites. Yet there are cattle continually damaging all of these things. It doesnt make much sense. While cattle have been excluded from some canyons, an important step, the mesa tops are covered with archeological sites. I know grazing management has improved over the years, and am not up-to-date on recent years improvements, so I thank you for any of those improvements. But I urge you to reduce the number of cattle in the monument, ant least for an impact-evaluation period, and to generally strengthen grazing management to reduce damage.		includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic functions.
1573-3	Richard Feldman 119 Cherry Ln teaneck, 07666		Improper grazing has caused, and continues to cause, significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan should require the agencies to immediately begin compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs.	ALT05-Alternative E, GRAZ01-General	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. In addition, the Goals and Objectives listed in Chapter 2, and Appendix G includes managing for the standards for rangeland health that includes upland soils exhibit permeability and infiltration rates that sustain or improve site productivity, considering the soil type, climate, and landform; riparian areas are in properly functioning conditions; desired plant species are maintained at a level appropriate for the site and species involved; and BLM will apply and comply with water quality standards established by the State of Utah and Federal Clean Water and Safe Drinking Waters Act.
1575-4	Steven Glow, MT 59831		Improper grazing has caused, and continues to cause, significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan should require the agencies to immediately begin compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs.	ALT05-Alternative E, GRAZ01-General	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the Management Actions by Alternative table in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and, on BLM-administered lands only, unless a current (within the last 10 years) land health assessment has been completed.
16068-2	Anthony Wojcik	American Legion Post #97	Alternative E includes the following wording: Prohibit new water source development for domestic livestock unless necessary to protect BENM objects. Existing water developments for livestock or wildlife would be removed unless they protect BENM objects, where feasible. Such wording is inconsistent, irrational, and illogical if the goals are to maintain the health of the land and the resources. Domestic livestock will congregate around water sources, so if water sources are removed or not developed, there will be fewer locations for animals to water. The impact to the soil, plant life, and natural sources of water (springs) will not be protected if water sources are not developed or are removed. Range improvements are always implemented to help support sustainable grazing practices. A rancher would not devote time, effort, and money to a range IMPROVEMENT unless it IMPROVED the area. Hence, saying range improvements will be removed does not make sense (Alternative E).	ALT05-Alternative E, GRAZ01-General	See Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section which states water developments would be removed if not consistent with protecting BENM objects. The impacts of the prohibition of new range improvements unless the primary purpose is to protect BENM objects is analyzed in the Livestock Grazing section in Chapter 3.
17130-2	Carly Webster Moab, UT 84532		I do not support Alternative E's plan for grazing. Historically, cattle were allowed to graze these lands and have caused too much damage to continue to be allowed in the lower elevations of the Monument, such as Cedar Mesa, Comb Ridge, Butler Wash, and along Highways 95, 261 and 211. As a visitor to these areas, cattle have negatively impacted my enjoyment of the area. They are often blocking travel on roads, stirring up dust, damaging trees and other natural plant species, contaminating water sources and, most importantly, trampling archeological sites. Just like dogs, cattle and archeology don't mix. We must prioritize the protection of these natural resources and waterways over the allowance for grazing on public lands, especially in the desert. Allowances can be restricted to forest service lands, but overall, grazing should be greatly reduced and only allowed outside of the monument boundaries.	ALT05-Alternative E, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections include management actions for the protection of air quality, water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In addition, the Goals and Objectives listed in Chapter 2 and Appendix G includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic functions. Many roads are considered open range that cattle may access and requires motorized users to share the roadway.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17203-4	Richard Plummer		Improper livestock grazing has caused, and continues to cause, significant damage to cultural sites, native vegetation, soils and their component biological elements - and especially the water availability and quality in the Monument's riparian areas. The final plan should require the managing agencies to immediately assess resource profiles of livestock grazing units. It should prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs, and must define compliance monitoring protocols for livestock grazing.	ALT05-Alternative E, GRAZ01-General	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Under the Proposed Plan, in the Management Actions by Alternative table in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only unless a current (within the last 10 years) land health assessment has been completed.
1733-1	Cows are NOT sacred		Alternative E is a good start but greater grazing limits should be added to it.	ALT05-Alternative E, GRAZ01-General	The Proposed Plan makes slightly fewer acres available to/suitable for grazing than Alternative E.
17421-3	William Croft 1801 Stanford Drive NE Albuquerque, NM 87106		There are ways in which I would suggest improvements to Alternative E. Extensive cattle grazing has caused a great deal of damage to desert ecosystems. While I recognize the desire to continue grazing on National Monument land, grazing impacts should be carefully monitored, and cattle should be excluded from natural water sources such as riparian areas and springs.	ALT05-Alternative E, GRAZ01-General	The Proposed Plan in the Livestock Grazing section and Water Resources section include management actions for the protection of water resources. The Proposed Plan prohibits trailing in riparian corridors except where existing livestock corridors occur, and rehabilitates existing corridors where damage is occurring to riparian resources. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
18082-34	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Additionally, page 35 of the BEITC LMP explicitly notes overgrazing as a concern among some Tribal members, as it can lead to soil erosion and affect plant resources (Appendix L). Since Alternative E maximizes the consideration and use of Tribal perspectives, the EPA recommends considering reductions of AUMs and HMs under Alternative E to address Tribal concerns regarding overgrazing.	ALT05-Alternative E, GRAZ01-General	The Proposed Plan would not alter currently allocated AUMs as outlined in the Management Actions by Alternative table in the Livestock Grazing section. Modifications to AUMs would be done at the site-specific implementation level planning process under the Proposed Plan the agencies would develop and implement allotment management plans (AMPs) for all allotments within BENM as necessary, in collaboration with the BEC. Development and implementation of AMPs would include analysis of the allotment, including evaluating range improvements and stocking rates, as needed, and ensure consistency with protection of BENM objects.
18238-66	Chaitna Sinha		We propose that the Slickhorn Canyon pasture and the upper part of the unnamed canyon in the Point Lookout pasture, both included in Alternative D, be made unavailable for grazing in the final plan. The upper part of Slickhorn Canyon proper is currently unavailable for grazing (included in Alternative A). However, the Slickhorn Canyon pasture, which is considered for unavailability in Alternative D, also includes other important canyons that drain into the San Juan River. Foremost amongst these is an unnamed canyon between Slickhorn Canyon and Point Lookout. This unnamed canyon contains a healthy riparian area and important cultural resources. This area should be made unavailable to cattle grazing in order to protect these important Monument objects and values and comply with the Proclamations. The upper part of this canyon is in the Point Lookout pasture, which is also analyzed in Alternative D, and is inaccessible to cattle. Based on our observations, Slickhorn Canyon pasture is not actively grazed. Thus, allocating these areas as unavailable for grazing would be in line with areas currently included in Alternatives B, C, and E.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, referenced areas in Slickhorn Canyon (Perkins South Allotment) and are already unavailable to grazing per the 2008 RMP, and will continue to be unavailable.
18238-69	Chaitna Sinha		We propose that Tuerto Canyon, which is included in Alternative D, be allocated as not suitable for grazing in the final plan. Tuerto Canyon is specifically identified as a Monument object, as are canyon bottom riparian communities and the wildlife dependent on them across the Monument. In addition, Proclamation 10285 identifies Ancestral Pueblo sites in the area with special significance to the Pueblos of New Mexico. Tuerto Canyon contains an important riparian area, which as we understand is generally not grazed other than once in a while by a few animals. Tuerto Canyon should be allocated as not suitable for cattle grazing in order to protect the important Monument objects and values present there.	ALT05-Alternative E, GRAZ01-General	Although considered in the range of alternatives, the closure of Tuerto Canyon to grazing is not carried forward in the Proposed Plan. See the Management Actions by Alternative table in the Livestock Grazing section in Chapter 2. The agency's will work collaboratively with the BEC to prioritize review and processing of grazing permits to include compliance monitoring and resource assessments to protect BENM objects. Agency's may consider suitability of sub-areas of allotments, which could include Tuerto Canyon, at that time.
18238-73	Chaitna Sinha		We propose: The final plan include the following management actions from Alternative E, with the proposed improvements (in bold): Utilization levels of key forage species will be identified on an allotment-specific basis. Only native species will be used as key forage species to assess utilization. Utilization levels will be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels will be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines. The default utilization level for the Monument is 30%, unless it can be demonstrated that a higher utilization level will benefit Monument objects. Utilization levels will accommodate forage needs of native wildlife. [see letter for emphasis]	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan livestock grazing would be managed, subject to terms and conditions, in a manner consistent with the protection of Monument objects. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS.
18486-2	Anne Clare Erickson 329 Hillside Dr Moab, 84532		First I would like to suggest an improvement in how the livestock is managed. I have seen places completely trampled, overgrazed and just plain ugly from the damage incurred. Please set utilization levels at 30% to lessen this damage. Then it can be determined if the monument can handle more grazing and still uphold the level of protection needed to sustain the resource. And when a rancher	ALT05-Alternative E, GRAZ01-General	The Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section of Chapter 2 includes management for utilization standards to be identified on an allotment specific basis within 2 years of the plan decision. The process of relinquishment of grazing permits is included in the Proposed Plan as provided for in Proclamation 10285.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			decides to not graze anymore, please retire his permit to lessen the number of livestock allowed in the monument.		
18560-3	Anna Peterson	The Mountain Pact	but there should be improvements to how livestock grazing is managed - please set utilization levels at 30% or below until you determine if a higher level of grazing would be protective of monument objects and values.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
18610-2	Kate Mabry		Oppose the issuance of livestock permits for privately owned livestock as they degrade our public lands by destroying cultural sites, compacting the soils, destroying riparian areas along streams and the public derives no benefits from livestock environmental devastation. Most National Monuments DO NOT ALLOW livestock grazing nor should it be allowed in Bears Ears National Monument. It was wrong to allow the drilling of 40 water wells on our public lands for privately owned livestock. Retire the grazing permits over the next 10 years.	ALT05-Alternative E, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections of the Proposed Plan include management actions for the protection of soils, water resources, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely.
18612-10	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	The new wells proposed for Indian Creek are of particular concern. The draft EA analyzing these new water sources identifies livestock grazing as the reason the allotment does not meet land health standards. Adding new wells is not appropriate when reducing or eliminating livestock grazing is a less expensive, more effective way to protect monument objects. Changes in livestock management should be implemented instead, and if that is not adequate to restore monument objects, livestock must be reduced or removed. The draft RMP must recognize that livestock grazing is a discretionary use. New water sources that impact new areas are not fulfilling the Proclamations mandate to protect BENM objects or the NLCS direction to manage according to science. Therefore, since the draft has no restrictions on or definitions of protection of BENM objects, we recommend adopting Alt D, which clearly prohibits new water developments and range improvements for livestock. The RMP calls for no new water developments and range projects in the preferred alternative unless necessary to protect objects, and then includes a long list of proposed water developments and range projects. This is inconsistent with the spirit of Alt E. In this case, Alt D banning all new water and range projects is a more protective choice.	ALT05-Alternative E, GRAZ01-General	There are currently no water wells proposed for the Indian Creek allotment, the application was withdrawn by the permittee. In the Management Actions by Alternative table in the Livestock Grazing section the Proposed Plan new water developments or modifications to existing water developments would be prohibited unless the primary purpose is to protect BENM objects.
18612-11	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	- Improve Alt E by clearly defining the conditions under which new water sources is the best way to protect monument objects. This should be supported by science.	ALT05-Alternative E, GRAZ01-General	In the Management Actions by Alternative table in the Livestock Grazing section the Proposed Plan new water developments or modifications to existing water developments would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years. The Proposed Plan in the Management Actions by Alternative table in the Water Resources section states; "In collaboration with the BEC, new land use permits supporting for new groundwater withdrawals or diversions would not be authorized unless necessary to ensure the protection of BENM objects. Require a hydrologic study would be required for all proposed discretionary land uses for supporting groundwater withdrawals"
18612-6	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	The AMS shows 30 allotments within the Monument boundaries, 8 administered by Forest Service and 21 by BLM. 13 Of the BLM allotments, 18 are in the Improve category according to the Rangeland Administration System (RAS). 14 BLM IM20009-018 defines Category I allotments as ones where current livestock grazing management or level of use on public land is, or is expected to be, a significant causal factor in the non-achievement of land health standards, or where a change in mandatory terms and conditions in the grazing authorization is or may be necessary. 15 This is an indication that monument objects are not being protected in Category I allotments. Further, RAS shows that of the BLM permits on BENM, only one (Tank Draw) has been renewed under the full NEPA process with land health evaluations and public input. The rest have been renewed administratively for decades. WWP supports the Alt E alternative on permit renewals (Row 1 page 2-125), but the agencies should strengthen the language. BENM should commit to eliminating administrative renewals over the next ten years and clarify that permit renewals will be processed fully according to NEPA guidelines, including up-to-date land health evaluations and public input. This should apply to both BLM and US Forest Service allotments.	ALT05-Alternative E, GRAZ01-General	An allotment being categorized as "I" does not automatically indicate that it is degraded. The criteria used for the placement of the allotments into the category are based on resource potential, resource use conflict, or controversy, opportunity for positive economic return on public investments, and the present management situation. In each category, all items may apply to the allotment or there may be only one specific item that causes the allotment to be placed into the specific category. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals.
18668-3	Vanessa Soncco		Give greater consideration to Tribal recommendations on decisions regarding grazing as Tribal members have grazed the lands for several hundred years while maintaining a unique environment. Please explore permitting authority to Ute and Navajo Nation Tribal members as they have grazed Bears Ears for hundreds of years as it is traditional practice based on the standards of Traditional Ecological Knowledge	ALT05-Alternative E, GRAZ01-General	The Proposed Plan includes" In collaboration with the BEC and grazing permittees, develop grazing permit terms and conditions, monitor rangeland conditions and adapt grazing practices as necessary to maintain or make progress toward meeting rangeland health standards through incorporation of Traditional Indigenous Knowledge where applicable and consistent with protecting BENM objects." and "Incorporate Traditional Indigenous Knowledge into all parts of the livestock grazing decision-making processes. "

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18738-2	Carol Toffaleti Albuquerque, NM 87106		3. I am concerned that grazing has been causing damage to native vegetation and the soils they depend on, to water quality and quantity, riparian areas, as well as cultural sites. The final plan should require the agencies to exclude livestock from riparian areas, any perennial streams, and springs and, in general, to better monitor and enforce permittees compliance.	ALT05-Alternative E, GRAZ01-General	The Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections of the Proposed Plan include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Included in the Management Actions by Alternative table in the Livestock Grazing section is the agencies that would prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments, to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals.
18853-1	Tom Ribe		Thus, I urge you to adopt Alternative E but with a plan to close ALL of the grazing allotments in the Bears Ears, either by buying out the allotments or by reducing the number of livestock to very low numbers heading toward zero animals in a few years. I know this will be considered impossible for political reasons. But be honest. Cows dont belong in the desert. They damage recreation opportunities, destroy wildlife habitat, ruin watersheds, and destroy springs. None of this is in the public interest. Close the grazing allotments. All of them.	ALT05-Alternative E, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely. The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing or limited to trailing. The Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections of the Proposed Plan include management actions for the protection of water resources, vegetation, wildlife and addresses conflicts with recreation use. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
5740-7	Roger Jenkins 588 Evening Star Ln, Bozeman, MT 59715 BOZEMAN, 59715		Alternative E, the preferred alternative, highlights a logical inconsistency. On Page 3-129, there is mentioned a restriction on off-trail travel. The idea is that there would be fewer impacts on vegetation. First, there are very few trails in canyon country, except, perhaps, on a few places in canyon bottoms. I always avoid walking on places where people have not walked, so as not to damage the cryptobiotic crusts. However, if impacts on vegetation are important in this Alternative, why is more cattle and sheep grazing permitted in Alternative E. Cows and sheep really dont care where they walk. Perhaps this needs to be re-written so as to clarify what is meant, specifically, about off-trail hiking.	ALT05-Alternative E, GRAZ01-General	The Proposed Plan includes more BLM acres made unavailable and limited to trailing only than what is currently authorized. The Proposed Plan encourages recreationists to remain on designated and existing trails, and there is no prohibition on off-trail hiking generally applied across the Monument.
8953-5	Joseph Allen		The overgrazing of livestock can have devastating impact on delicate ecosystems, such as that at Bears Ears. Adopting Alternative Es and setting grazing levels at a maximum of 30% would be key to establishing a baseline for future grazing levels.	ALT05-Alternative E, GRAZ01-General	The Proposed Plan in The Management Actions by Alternative table in the Livestock Grazing section includes management for utilization standards to be identified on an allotment specific basis within 2 years of the plan decision. Potential impacts of livestock grazing on natural resources is disclosed throughout Chapter 3.
9111-1	Lucy Duff 9210 Fowler Lane Lanham, 20706		Proper Livestock Management: The Bears Ears Inter-Tribal Coalition Land Use Plan advises that cattle "be cared for properly so they dont destroy the land." Request that Alternative E incorporate language requiring range riders to move cattle daily to prevent over-concentration in sensitive areas, particularly springs, and eliminate fences and livestock watering installations where possible.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Routine management of livestock includes the use of "cowboys" or "range riders" to distribute livestock, maintain range improvements, and other duties associated with livestock management. Requiring this is outside the scope of this Plan. Existing range improvements would be maintained if consistent with protecting BENM objectives.
9127-2	Adam Auerbach		Proper Livestock Management: The Bears Ears Inter-Tribal Coalition Land Use Plan advises that cattle "be cared for properly so they dont destroy the land." Request that Alternative E incorporate language requiring range riders to move cattle daily to prevent over-concentration in sensitive areas, particularly springs, and eliminate fences and livestock watering installations where possible.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Routine management of livestock includes the use of "cowboys" or "range riders" to distribute livestock, maintain range improvements, and other duties associated with livestock management. Requiring this is outside the scope of this Plan. Existing range improvements would be maintained if consistent with protecting BENM objectives.
9166-2	A BENM supporter		2. Please improve how the monument manages livestock grazing under Alternative E In the final plan, please improve livestock grazing management by setting utilization levels at 30%, at least until land managers determine if a higher level of grazing can still be appropriate to protect monument objects and values. This will help ensure that monument objects and values are protected from overgrazing.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan livestock grazing would be managed, subject to terms and conditions, in a manner consistent with the protection of Monument objects. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS.
9188-1	Nike Stevens		I urge you to adopt Alternative E with additional recommendations. I urge you to manage all areas with wilderness characteristic to maintain their wilderness character. Wildness is an important resource and deserves management attention. I have worked as a Wildlife Biologist on contract with the Navajo Nation for over 20 years in the Bears Ears National Monument and surrounding area. I have witnessed increased negative impacts of cattle grazing and off road vehicle use in the BENM especially on the Perkins allotments and in Arch Canyon. I support reducing grazing to sustainable levels and consideration of global climate change in all grazing plans and in regional and BENM grazing management. Current grazing plans have totally unrealistic grazing capacities that must be changed to reflect reality. Actual use is much lower but still excessive in light of increasing severity and frequency of droughts. Grazing management overall and individual allotment plants must reduce	ALT05-Alternative E, GRAZ01-General	For BLM lands, under the Proposed Plan in the Lands with Wilderness Characteristics section, 205,594 acres of non-WSA LWC would be managed to protect their wilderness characteristics and 216,371 acres would be managed to minimize impacts on wilderness characteristics. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The potential impacts of the Proposed Plan to cultural resources, archaeological sites, and historic resources are provided in Appendix N, and Chapter 3. The Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section allows for management adaptation and for adaptation to a changing climate and land uses. The Proposed Plan in the Livestock Grazing and Water resources sections include management actions for

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			grazing in proportion to the reduction in precipitation and increase in warming that the area is experiencing over the last 20 years and to reflect conditions worsening in the next 20 years. To leave grazing management the same as the climate warms and droughts worsen is to damage the range resource and harm all other resources including air quality, water erosion and wildlife habitat. Grazing plans at all levels must include closing sensitive areas to grazing including excluding cattle from archeological sites and sensitive riparian areas. and must reduce capacities and actual use to reflect the ongoing past and future decline in vegetative productivity due to climate change.		the protection of water resources. The Proposed Plan prohibits trailing in riparian corridors except where existing livestock corridors occur, and rehabilitates existing corridors where damage is occurring to riparian resources.
9330-2	Alice de Anguera		I am concerned about the amount of grazing allowed by Alternative E regarding both ecological damage and climate change. We are living in a turning point of history, where every CO2 emissions source we "let slide" in honor of tradition or for a small number of ranchers is less and less justified. Alternative D carries a full 12% less emission load regarding livestock grazing, and that is significant. We must consider the future of humanity on this planet; we in fact have a responsibility to do this for our children's sake. Additionally, these dry desert landscapes do not heal well from grazing. There are areas of both Canyonlands and Arches National Parks that have received zero grazing for decades but did not heal from historic levels of grazing without intensive revegetation work. I appreciate that sensitive areas such as Upper Salt Creek are removed in Alternative E, however, we need to do more. Please implement a program to retire ecologically sensitive areas of Bears Ears from grazing pressure. Alternative D is better on this point.	ALT05-Alternative E, GRAZ01-General	Per the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewals will be guided by current land health evaluations. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. The Proposed Plan includes making further acres on BLM unavailable to grazing in the John Canyon pasture and limited to trailing only in the North Cottonwood and North Cottonwood Upper pastures.
9331-2	Daren Cornforth		To prevent damage to cultural sites, native vegetation, streams, and riparian areas, and soils, I support a more thorough monitoring of and compliance to existing livestock grazing practices, the prohibition of new water developments, and exclusion of livestock from perennial surface waters, riparian areas, and springs.	ALT05-Alternative E, GRAZ01-General	The Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections of the Proposed Plan include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the Management Actions by Alternative table in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only unless a current (within the last 10 years) land health assessment has been completed.
9372-17	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	On page 48, alternative E has some issues when it states, Alternatives D and E restrict them and include the potential to remove existing improvements and developments, except where they help protect BENM objects. This refers to water sources on grazed lands. To restrict grazing from having, maintaining, developing, and even providing new water sources is going to have a negative impact on grazing. To restrict that is hurtful to the land users, but also to the animals themselves. Furthermore, these water sources do, in reality, protect BENM objects. Water is a critical need for animals. If livestock can get to water more easily, livestock will wander less. Livestock will be easier to gather if they are at developed water sources. Livestock will be less inclined to trample other areas of sensitivity if they are provided water in specific locations. The only other alternative is to haul water to livestock. This is costly to the financial impact of grazing as well as results in frequent vehicular travel into remote areas.	ALT05-Alternative E, GRAZ01-General	In the Management Actions by Alternative table in the Livestock Grazing section under the Proposed Plan would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. See the Livestock Grazing section in Chapter 3 for a discussion of impacts on livestock grazing management as a result of range improvement and water development management actions.
F4-3			Please improve Alternative Es management of livestock grazing in the final plan by setting utilization levels at 30% until you determine if a higher level of grazing is still protective of monument objects and values.	ALT05-Alternative E, GRAZ01-General	Under the Proposed Plan livestock grazing would be managed, subject to terms and conditions, in a manner consistent with the protection of Monument objects. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS.
18238-70	Chaitna Sinha		[Trailing] North Cottonwood Pasture and North Cottonwood Upper Pasture We propose that these two pastures from Alternative D be limited to trailing only in the final plan. North Cottonwood Creek is specifically identified as a Monument object, as are canyon bottom riparian communities and the wildlife dependent on them across the Monument. In addition, Proclamation 10285 identifies Ancestral Pueblo sites in the area with special significance to the Pueblos of New Mexico. Cattle are damaging North Cottonwood Creeks riparian area, including excessive browsing of woody riparian vegetation, trampled and eroding streambanks, heavily grazed understory vegetation, and excessive bare ground. See Appendix A, North Cottonwood Creek Condition Assessment. Additional information regarding the conditions of riparian vegetation in North Cottonwood Creek is available through the BLMs Assessment, Inventory, and Monitoring (AIM) Data Viewer. The first table below shows AIM Lotic Indicators data collected at the same general location (what we have called site 3) in 2014, 2018, and 2023. [see two tables in letter]	ALT05-Alternative E, GRAZ01-General, DATA03-Suggest Additional Data Source	The Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section includes North Cottonwood Pasture and North Cottonwood Upper Pasture as limited to trailing.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18238-72	Chaitna Sinha		We propose that a modified polygon be adopted as the Chicken Corners area and be allocated as unavailable for grazing in the final plan. This area is included in Alternative B, and our understanding is that this area was identified as not currently being grazed. We visited this area and found that natural topography prevents cattle from grazing a larger area than what is encompassed in the polygon included in the DEIS GIS data, especially along the Colorado River. Based on our on-the-ground observations of this area, the shore of the Colorado River surrounding the Goose Neck is not accessible to cattle. Thus, we are submitting a shapefile that includes a modified polygon of this area that encompasses this larger currently ungrazed area. This shapefile includes associated metadata that explains our suggested modifications.	ALT05-Alternative E, GRAZ01-General, DATA03-Suggest Additional Data Source	The section of Chicken Corner submitted for additional acres is currently accessible by livestock. The additional acres submitted for Chicken Corners may be adjacent to the proposed acres in Alternative B, C, and E which currently are not being grazed, but they are separated by tall cliffs along the Colorado river in the area proposed. Livestock can currently access the areas along the river in this allotment. No change made to that allotment.
18610-5	Kate Mabry		Inventory and improve management of plants, trees, and vegetation for wildlife especially by phasing out all livestock grazing permits in the next 10 years. At a minimum charge the livestock owners todays competitive prices for the grazing permits until they are phased out completely.	ALT05-Alternative E, GRAZ01-General, HABVEG01-Vegetation	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The cost of an AUMs is set by regulation and outside of the scope of this plan. The Proposed Plan in the Livestock Grazing, Vegetation, and Wildlife and Fisheries sections include management actions for the protection of vegetation and wildlife. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3.
1980-4	Thea Levkovitz		There are some improvements that could really make this Alternative E the gold standard for land management. 3) Livestock should be excluded from access to surface water springs and prevent grazing in riparian habitats as is outlined in Alternative D	ALT05-Alternative E, GRAZ01-General, WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology)	In the Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section, has management actions for new water developments. They are prohibited unless they can protect BENM objects. In the Proposed Plan, the Water Resources section includes protection for water sources.
10678-3			I support Alternative E's prohibition on chaining native vegetation and ask that the preferred alternative include a requirement to use only native plant species for restoration and post-fire seeding, as outlined in Alternative D.	ALT05-Alternative E, HABVEG01-Vegetation	The agencies considered this comment. In the Proposed Plan, chaining is prohibited in Section the Management Actions by Alternative table in the Vegetation section.
1195-2	Lee Stanfield		As you adopt Alternative E in the final plan, you must refine it so that it bars mechanical treatments for vegetation management (including clearcutting), that it uses only native seeds in restoration projects, and that it enacts immediate protections for old-growth trees. Extensive damage has already been done to cultural sites, soils, and native vegetation by decades of destructive vegetation treatments in the region, and nows the time for a new approach.	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in the Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See Chapter 3 for discussion of impacts to vegetation and cultural resources, respectively, from vegetation management.
1273-2	Robin Poppen		Alternative E could be improved by banning mechanical treatments for vegetation management, uses only native seeds in restoration projects and enacts immediate protections for old-growth trees.	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
15055-10	Robin Todd	Maryland Ornithological Society	Re-seeding after fire or restoration activities should use only native species. Within a national monument, the priority should be to protect native ecosystems.	ALT05-Alternative E, HABVEG01-Vegetation	The Proposed Plan would prioritize using native seeds for restoration based on availability, adaptation, and probability of success.
15055-9	Robin Todd	Maryland Ornithological Society	The final plan should bar mechanical treatments to remove sagebrush, pinyon pine, juniper, and other vegetation. MOS members have seen the results of such treatments elsewhere in southern Utah. Those projects were intended to provide better livestock grazing, but the resulting habitat has less value for birds and native mammals.	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management. All projects consider impacts to wildlife and wildlife habitat through site specific analysis.
1518-1	Norma Kline		As you adopt Alternative E in the final plan, please refine it in these ways to best protect the resource and its cultural values: 1. Bar mechanical treatments for vegetation management; 2. Use only native seeds in restoration projects	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
15555-3	Mary Moran 1991 Highland Dr Moab, UT 84532		Also, I would hope some emphasis on restoring native plants could be included in the plan. Incorporating traditional indigenous knowledge is important here. My work life involved native plant restoration in southeast Utah, so I know that it takes moments to damage native vegetation compared to years to restore it.	ALT05-Alternative E, HABVEG01-Vegetation	The Proposed Plan would prioritize using native seeds for restoration based on availability, adaptation, and probability of success.
15555-5	Mary Moran 1991 Highland Dr Moab, UT 84532		Native seeds are difficult to find, and expensive. Planting non-native, often invasive grasses for livestock or other ungulates is not consistent with promoting a healthy ecological system. Besides that, the treatments expose cultural sites previously hidden by the dense trees, and expose them to damage, if they arent damaged by the treatments themselves.	ALT05-Alternative E, HABVEG01-Vegetation	The Proposed Plan would prioritize using native seeds for restoration based on availability, adaptation, and probability of success. See Section the Cultural Resources section for a discussion on impacts.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
1575-5	Steven Glow, MT 59831		I support Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management. To best protect sensitive resources and cultural sites, Alternative E should also be modified to prohibit mechanical treatments and commercial timber harvest, and require the use of native seeds for revegetation and reclamation.	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
17203-5	Richard Plummer		To best protect sensitive resources and cultural sites, Alternative E should also be modified to prohibit mechanical treatments and commercial timber harvest and require the use of native seeds for revegetation and reclamation.	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management. See Cultural Resources in Chapter 3 for a discussion on impacts to cultural resources.
18238-11	Chaitna Sinha		We propose: The final plan must explicitly define natural processes, a vegetation management method mentioned in Alternative E, and the definition of light-on-the-land must clarify that it does not include the use of mechanical methods.	ALT05-Alternative E, HABVEG01-Vegetation	The Proposed Plan would prohibit chaining throughout BENM.
18238-14	Chaitna Sinha		Existing vegetation treatments were likely conducted prior to the establishment of the Bears Ears landscape as a national monument and may not be consistent with the protection of Monument objects. We propose: A re-evaluation of existing vegetation treatments should be completed, and NEPA compliance with public comment opportunities should be conducted, prior to any vegetation treatment decisions.	ALT05-Alternative E, HABVEG01-Vegetation	Implementation of management actions that may be authorized or carried out by the agencies to meet proposed management goals or authorize site-specific activities would require implementation level analysis of potential impacts on vegetation and all BENM objects.
18238-17	Chaitna Sinha		Disk plows are a heavy farming tool that cuts deep into soil and flips it over, damaging intact soils and increasing erosion. It is commonly used on farms on soils with a high clay content. This section also explains tilling as a tool to remove vegetation and bury it, creating an unvegetated area. This is highly impactful, as the draft admits, and suited only for complete vegetation removal. This highly risky method risks exotic invasion (Zouhar 2003)9. We propose: Harrowing must be removed as an allowable treatment in the final plan. Disk plowing and tilling should only be permitted when attempting to restore native ecosystem functionality, such as attempting to convert a monoculture of the non-native smooth brome back to a native herbaceous vegetation community.	ALT05-Alternative E, HABVEG01-Vegetation	The Proposed Plan says that vegetation management would include all available tools, including mechanical methods, consistent with the protection of BENM objects. No chaining would be allowed and light-on-the-land techniques would be used where practicable.
18738-3	Carol Toffaleti Albuquerque, NM 87106		4. I support Alternative Es valuing of Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management. To best protect sensitive resources and cultural sites, Alternative E should also be modified to prohibit commercial timber harvest and require the use of native seeds for revegetation and reclamation.	ALT05-Alternative E, HABVEG01-Vegetation	The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management. All NFS lands within the Monument are unsuitable for timber production although timber harvest may occur for the protection of BENM objects.
1980-5	thea levkovitz		There are some improvements that could really make this Alternative E the gold standard for land management. 4. Alternative E could also be improved by prohibiting any chaining for vegetation management and commercial forestry activities. I support the use native revegetation.	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
2026-3	Ainsley Cathcart		I also urge you to adopt Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management; however, this approach should be enhanced to prohibit mechanical treatments and commercial timber harvest, while requiring the use of native seeds for revegetation and reclamation. Indigenous tribes have a profound understanding of the local ecosystems, having developed sustainable land management practices over hundreds of years.	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
2146-4	James Thompson		I also like Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management. To best protect sensitive resources and cultural sites, this alternative should also be modified to prohibit mechanical treatments and commercial timber harvest, and require the use of native seeds for revegetation and reclamation.	ALT05-Alternative E, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
9061-5			Only native plant species should be used for restoration and post-fire revegetation and reclamation from the massive land degradation caused by incompetent and uneconomic cattle management.	ALT05-Alternative E, HABVEG01-Vegetation	The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. Where probability of success or adapted seed availability is low, agencies would collaborate with the BEC to identify nonnative, non-GMO seeds that may be used to protect BENM objects.
9127-4	Adam Auerbach		Vegetation Management: Advocate for the adoption of Alternative D's provision to reduce the amount of vegetation used by cattle from 50% to 30%, until scientific evidence shows that a higher percentage can still protect resources.	ALT05-Alternative E, HABVEG01-Vegetation	Thank you for your comment. See changes to the Livestock Grazing Section in Chapter 2. The management action has been adjusted, but is still similar to Alternative E. See the impacts analysis to vegetation management in Chapter 3 in the vegetation management section.
18238-15	Chaitna Sinha		We propose: Vegetation Management in Wilderness areas should combine Alternative E with Alternative C and D (underlined) to say: Traditional Indigenous Knowledge and techniques, natural processes, and/or light-on-the-land methods for vegetation management will be the only methods of treatments authorized in designated wilderness, USDA Forest Service recommended wilderness, WSAs, and lands managed for wilderness characteristics. [see letter for emphasis]	ALT05-Alternative E, HABVEG01-Vegetation, WSA01-General	Under the Proposed Plan, vegetation treatments in designated wilderness would comply with regulatory requirements, require a Minimum Requirement Analysis, and would use the minimum tool required to maintain the wilderness character. Wherever practicable, vegetation management would use light-on-the-land techniques throughout the entire BENM.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
9061-2			Stronger protections and resources for endangered prehistoric architecture	ALT05-Alternative E, HIST001-General	Archaeological sites, including those with prehistoric architecture, are protected by provisions of the National Historic Preservation Act and the Archaeological Resources Protection Act under all alternatives. Additionally, Proclamations 9558 and 10285 require the protection of BENM objects, which would include prehistoric architecture. The protection of objects is incorporated into the Proposed Plan in the Overarching Management section.
614-5	Larry Ellertson		Alternative E right now, the preferred, is exclusion, right-of-way exclusion. It doesn't allow it even to be considered. I think it was Alternative E maybe. One of the other alternatives has a lot of right-of-way avoidance in it, which could allow for a utility easement right-of-way in the future should there ever need to be one, but it's not open. It's still a restricted process. So to me, because the one totally excludes it, I think that's short-sighted.	ALT05-Alternative E, LAND01-General	The agencies considered this comment. See the Proposed Plan in the Lands and Realty section for changes to ROW and SUP area designations for ROW avoidance, exclusion, and open areas on BLM lands.
18238-31	Chaitna Sinha		Our first concern with BLMs proposed management of LWC is the first Goal/Objective: Protect wilderness characteristics (appearance of naturalness and outstanding opportunities for primitive and unconfined recreation or solitude) of non-wilderness study area (WSA) LWC as appropriate, considering manageability and the context of competing resource demand. Id., p. 2-34. There is no mention of the Proclamation, collaboration with the BEC, or Monument objects. We propose: Protect wilderness characteristics (appearance of naturalness and outstanding opportunities for primitive and unconfined recreation or solitude) of non-wilderness study area (WSA) LWC, in collaboration with the BEC, to facilitate landscape-level protections for Monument objects and values as identified in Proclamations 10285 and 9558. In addition, the plan should address management consistency with remote recreation zones and adjacent lands managed by other agencies. We propose: Manage LWC as remote recreation zones to protect naturalness, quiet, solitude, and remote backcountry recreation opportunities within the Monument, and ensure harmonious management with Monument-adjacent lands managed by other federal agencies.	ALT05-Alternative E, LWC01-General	The agencies considered the commentors suggested change. BLM policy (Manual 6320 - Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Processes) states that lands with wilderness characteristics should be evaluated as a part of the planning process and the agency should examine options for appropriate management of those lands. The objective/goal found in the Lands with Wilderness Characteristics section was developed upon the options outlined in that manual and is consistent with the other actions in the plan, including the zoned approach to management and input from the BEC. The Proposed Plan is consistent with Proclamations 9558 and 10285.
15055-5	Robin Todd	Maryland Ornithological Society	Certain areas within the monument totaling approximately 390,000 acres have been found to have wilderness characteristics, although they are not within wilderness study areas. These should be managed so as not to impair their suitability for designation as wilderness. Appropriate guidance appears in BLMs Manual 6330 for Management of Wilderness Study Areas.	ALT05-Alternative E, LWC01-General	As per BLM Manual 6320, inventoried lands found to have wilderness characteristics through the land use planning process may result in several outcomes, including (1) allowing for other multiple uses in an area while not protecting wilderness characteristics; (2) minimize impacts to wilderness characteristics via management restrictions (e.g., terms and conditions of use or stipulations) while emphasizing other multiple uses; or (3) Protecting wilderness characteristics while providing for compatible multiple uses. Managing those areas specifically to meet the non-impairment standard applied to WSAs is outside of the remit of the LUP process.
18238-35	Chaitna Sinha		In the interim, the following nine recommended wilderness areas that were submitted to the Manti-La Sal National Forest as a part of a comprehensive Conservation Alternative16 and during this plans scoping period as a GIS shapefile. These areas should be managed to maintain and protect their wilderness character. [see letter for table]	ALT05-Alternative E, LWC01-General	It is outside the scope of this RMP and EIS to identify and evaluate recommended wilderness as well as to provide interim direction for acres not identified or evaluated in this planning effort. The Manti-La Sal National Forest is identifying and evaluating recommended wilderness in its land management plan revision process and direction regarding any potential recommended wilderness areas would be addressed in that plan and planning process.
3125-29	Steve Knox		Page 2-40 and 2-41, Special Designations, Table 2-9, 2008 Monticello RMP, Wild and Scenic Rivers action, Colorado River segments 2 and 3, Alternative E These segments are located in LWC proposed for management of their wilderness values and characteristics. Why dont you recommend suitable Wild? And Figure 2-9 doesnt show a proposed ACEC under Alternative E that incudes Colorado River 2 and 3. Please clarify.	ALT05-Alternative E, LWC01-General	The WSR recommendation is based on the inventory that was completed in advance of the 2008 plan. The segments in question were not classified as wild due to the presence of motorized use on the river and to provide consistency with the Moab Field Office's management of the north side of the river.
18238-83	Chaitna Sinha		Finally, we encourage the agencies to complete sound modeling to assess noise impacts from OHV use to monument and national park visitors as well as wildlife. Having better data on soundscape impacts from OHV use can help determine appropriate use levels and locations during travel management planning.	ALT05-Alternative E, NOISE01-General, DATA01-Analysis Methods and Data	The agencies are committing to developing an implementation level soundscape management plan in alternatives, which will consider how to protect Bears Ears soundscapes. As described in the Visual Resource Management, Night Skies, and Soundscapes section, the agencies would also collaborate with BEC to inventory and monitor soundscapes, in addition to the development of a soundscape management plan
13090-1			I am a member of the public that is interested in paleontology and am concerned by the RMP's current stance on fossil collecting at the moment. I would prefer an option that would allow for fossil collection for the express purpose of scientific research, museum exhibition and public education. Permitted collection and curation of fossils by qualified paleontologists are the only way to ensure that fossils are preserved for such purposes. I kindly request to modify option E with option A's language in the paleontological resources section. This would allow fossils to be researched, excavated, enjoyed and enhanced by the Traditional Indigenous Knowledge that tribes have of the resources in the BENM region. Only option A protects permitted paleontological collection as stated by the Paleontological Resources Protection Act and the Presidential Proclamations establishing and restoring Bear Ears National Monument.	ALT05-Alternative E, PALEOGE001-General	Under the Management Actions Common to all Alternatives section in the Paleontological Resources section in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17528-1			I am a member of the public who cares about paleontology. I am concerned about the RMP's stance on fossil collecting and support any option that includes permitted fossil collection for scientific research, museum exhibitions, and public education and outreach. Permitted collection and curation by qualified paleontologists is the only way to ensure that fossil resources are preserved for scientific research and educational purposes. 'Option E' should be modified with the 'Option A' language in the paleontological resources section. This will allow fossils to continue to be excavated, studied, and enjoyed by the Traditional Indigenous Knowledge that tribes have regarding many of the resources within the BENM region.	ALT05-Alternative E, PALEOGE001-General	Under the Proposed Plan in the Management Actions by Alternative table in the Paleontological Resources section, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
9215-1	Scott Madsen		The exceptional fossil record at Bear's Ears needs to be preserved and studied as one of the reasons the monument was established. I would advise you to use the language from Option A regarding paleontological research and collecting in the monument and insert it into Option E.	ALT05-Alternative E, PALEOGE001-General	Under the Proposed Plan in the Management Actions by Alternative table in the Paleontological Resources section, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16784-12	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Page 2-15, second action point, Alternative E: The sentence "Any work done involving fossils should not be extractive; fossil resources should not be extracted from BENM" should be replaced with the management action point from BEC, "[c]ollection of paleontological objects will be by permit only. Tribal Nations of the BEITC have traditional uses for petrified wood. Special permits should be granted for collection by tribal members" (Appendix L-C, p. 8). Extraction and removal are, in most cases, essential for other management actions that would be adopted with Alternative E, including protecting paleontological resources, fostering public awareness, providing public access for scientific education, identifying, studying, and interpreting paleontological resources, inventorying and monitoring them, or mitigating damage to them.	ALT05-Alternative E, PALEOGE002-Related to research communities, local communities, and visitor experience	The agencies considered this comment. Collection of BENM objects and resources, which includes, but is not limited to petrified wood, would be prohibited except where the collection is specifically allowed under Proclamation 9558 or 10285 and permitted by authority, or the prohibition is inconsistent with Religious Freedom Restoration Act, or other applicable law. The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
16784-3	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Furthermore, extraction only rarely causes damage to the landscape or the integrity of its visual appearance. We, therefore, recommend substituting the language from the Collaborative Management Plan of the Bears Ears Inter-Tribal Coalition (BEITC) that [c]ollection of paleontological objects will be by permit only. Tribal Nations of the BEITC have traditional uses for petrified wood. Special permits should be granted for collection by tribal members (Appendix L-C, p. 8).	ALT05-Alternative E, PALEOGE002-Related to research communities, local communities, and visitor experience, DATA03-Suggest Additional Data Source	The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
9146-2	Robert Gay 614 N. 10th Pocatello, ID 83201		If new wording is not possible within the existing Options, my comment would be to support 'Option E' with ONLY Section 3.4.1 changed to the 'Option A' language. Only the wording in 'Option A' fully protects paleontological resources (including research and education) as required under both the Paleontological Resources Protection Act and the Executive Orders creating and restoring BENM, and represents the closest understanding of how paleontology and paleontological resources would be protected among all coalition members prior to the establishment of BENM.	ALT05-Alternative E, PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Proposed Plan in the Management Actions by Alternative table in the Paleontological Resources section, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
9287-2	Vaughn Hadenfeldt		Scientific study of cultural and paleontological resources must be allowed to continue. Appropriate excavation and collection, when necessary, should be allowed with governmental oversight. For example, exciting archaeological discoveries recovered from LIDAR technology is exposing how extensive prehistoric use of the landscape in BENM was.	ALT05-Alternative E, PALEOGE002-Related to research communities, local communities, and visitor experience	Scientific study of cultural and paleontological resources can be permitted in BENM. Under the Proposed Plan in the Management Actions by Alternative table in the Paleontological Resources section, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. In the Proposed Plan in the Inventorying, Monitoring, Science, and Indigenous Knowledge section, agencies would collaborate with the BEC to facilitate increased scientific research and increased understanding of Traditional Indigenous Knowledge to further understanding of BENM objects.
16784-11	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Page 2-14, fifth action point, Alternative E: The RMP states, Casting of paleontological resources would be by permit only. We recommend that the wording be changed to Casting of paleontological resources such as trackways that are not being collected and remaining in situ would be by permit only, except where a resource has been evaluated as safe for non-permitted casting for the enjoyment of the resources by non-paleontologists. This statement seems to have been taken from the Monticello RMP, but it is vague and seems unworkable largely because the term casting is not defined and the context is not specified.	ALT05-Alternative E, PALEOGE003-Paleo	The agencies have considered the proposed change. "In situ" has been added to the management action related to casting in the Management Actions by Alternative table in the Paleontological Resources section under the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
16784-2	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Our most important comment on the draft RMP/EIS is that the provision that Any work done involving fossils should not be extractive; fossil resources would not be extracted from BENM should be removed (Section 2.4.4.3, Table 2-3, Alternative E). This provision does not appear to be underpinned by and, as the EIS concludes, it is incompatible with the conservation of paleontological resources because avoidance of fossil extraction would result in paleontological resources being exposed to the elements indefinitely, this would result in eventual erosion and may result in vandalism or destruction of paleontological resources (Section 3.4.1.2.7, Impacts under Alternative E).	ALT05-Alternative E, PALEOGE003-Paleo	Under the Proposed Plan in the Management Actions by Alternative table in the Paleontological Resources section, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
1928-4	Robert Pazik		Paleontologists should, by permit, be able to collect and study paleo resources in order to understand them and protect objects and values in the Proclamation.	ALT05-Alternative E, PALEOGE003-Paleo	Under the Proposed Plan in the Management Actions by Alternative table in the Paleontological Resources section, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
18858-5	Lucia Christensen		Finally, I do believe that climbers should be considered as recreational stakeholders in the development of implementation plans for the Indian Creek area. It is imperative as a large recreation group that the specifics of climbing (re: permitting, bolting etc) be considered via input from this recreation group when drafting implementation plans for the zone.	ALT05-Alternative E, PUBL01-Public and Stakeholder Involvement	As applicable all implementation plans that require further analysis for step-down discretionary actions will follow applicable laws, such as NEPA and the NHPA and will include public involvement as dictated by these laws.
18238-76	Chaitna Sinha		Completing land health assessments and processing permit renewals is crucial to protecting monument objects, and to proper grazing management more generally. Alternative B includes completing land health assessments for four allotments within three years, and fully processing permit renewals for those allotments within six years of the signing of the ROD. Id., p. 2-129. Alternative D includes completing land health assessments and fully processing all BLM permit renewals across BENM (19 allotments) within ten years of the signing of the ROD. Id. Alternative E does not include any provisions to complete land health assessments and process permit renewals within a certain timeframe. It only includes vague language to prioritize the review and processing of grazing permits and leases. Id., p. 2-125. On this point, it is the weakest of all four action alternatives in terms of protecting Monument objects and values. In addition, we question why there is no provision to fully process permit renewals on Forest Service lands across any of the alternatives. Given that the standard timeframe for grazing permits is 10 years, this timeframe is also appropriate for completing a NEPA analysis for all permit renewals. Renewing permits under the same terms and conditions through a categorical exclusion is not appropriate given the Monument designation and the requirement to prioritize the protection of Monument objects and values over discretionary uses such as livestock grazing. Given the impairment of Monument objects as discussed above, it is evident that current grazing management is not adequately protecting Monument objects and values on allotments across BENM. Continuing the same management for another 10 years by renewing a permit without detailed analysis threatens to adversely affect Monument objects and values and violate the Proclamations. We propose the final plan: . Adopt the language from Alternative D with the following addition (in bold): Within 10 years of the signing of the ROD, complete land health assessments and, if needed, causal factor determinations, and fully process all permit renewals across BENM by completing a NEPA analysis. Id., p. 2-129. . Add the following language: For FS-administered lands, within 10 years of the signing of the ROD, fully process all permit renewals across BENM by completing a NEPA analysis. [see letter for emphasis]	ALT05-Alternative E, PUBL01-Public and Stakeholder Involvement, GRAZ01-General	The Proposed Plan also includes prioritizing 6 allotments for the completion of rangeland health assessments within 3 years and NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and all other allotments within or partially within BENM as fully processed permit renewals. In addition, the agencies will complete annual monitoring reports for grazing in collaboration with the BEC.
18342-1	Fred Swanson Teasdale, UT 84773		There appears to be insufficient accountability for actions taken under Alternative E. This alternative calls for collaboration with the Bears Ears Commission and the five involved tribes on many management action, but there are few or no guidelines or limitations on what actions could be taken as a result of such collaboration. Will there be an environmental analysis and public involvement for actions taken under a collaborative framework? If not, this limits the ability of the public at large to know and comment on specific management actions.	ALT05-Alternative E, PUBL02-Bears Ears Commission	The agencies would consider specific management actions on a case-by-case basis and complete analysis in accordance with applicable law, including seeking further input from the public, Tribal Nations, State, and local governments, as well as consulting parties under Section 106 of the National Historic Preservation Act.
18238-79	Chaitna Sinha		The final plan require the development of dispute resolution mechanisms between the Agencies and the BEC. While Appendix C does lay out a detailed framework for collaboration, we notice that the Agencies asks that the BEC commit to developing internal dispute resolution mechanisms, but there is no language around the collaborative development of dispute resolution mechanisms between the Agencies and BEC. As there will inevitably be times when BEC and the Agencies differ in their recommendations, we propose that the three co-managing bodies work together to develop a more detailed process for dispute resolution and incorporating input from the BEC as it is received.	ALT05-Alternative E, PUBL02-Bears Ears Commission, DECI05-Cooperating Agency Relationships	Proclamation 10285 re-establishes the BEC and directs the agencies to meaningfully engage with the Commission, including through the planning process, in order to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations. The role of co-stewardship described in the Proposed Plan facilitates coordination between the agencies and the BEC but does not curtail the statutory and regulatory authorities and responsibilities of the agencies. The Proposed Plan is consistent with all relevant laws and policies. The Proposed Plan does not cede any inherently federal function or decision-making authority over federal land to the BEC, or otherwise exceed the agencies' legal authority for managing federal lands within the Monument.
17807-3	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Provide Indigenous education of understanding and respecting BENM	ALT05-Alternative E, PUBL06-Public Outreach/Availability of Info	Cross Cultural Education and Outreach is described in Chapter 2. Specific details will be developed at the implementation stage.

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12438-12	Josh Ewing PO Box 328 Bluff, UT 84512		The Preferred Alternative does away with unique Recreation Management Zones (RMZs) for places like Cedar Mesa, Comb Ridge and Indian Creek and replaces them with a one-size-fits-all, Monument-wide system. While some consistency makes sense, the approach also limits the flexibility of the agencies to effectively manage unique areas. For example, the tens-of-thousands of climbers who visit Indian Creek each year have unique visitation patterns and impacts, requiring a customized approach for that area.	ALT05-Alternative E, REC01-General	The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities commensurate with the protection of BENM objects (see Appendix E for more details).
1327-4	Seth Roseman		Again, I kindly request the implementation of a zoned approach to recreation management to help concentrate use and development for recreation in areas where it is most appropriate to protect the monument.	ALT05-Alternative E, REC01-General	The Proposed Plan employs a zoned approach to recreation management.
15055-11	Robin Todd	Maryland Ornithological Society	The final plan should provide for management zones as described in Alternative E that will focus visitor-use facilities and intensive recreational use in front country zones, while protecting the wild character and the wildlife habitat values of backcountry areas.	ALT05-Alternative E, REC01-General	The Proposed Plan employs a zoned approach to recreation management.
17599-4	Byron Harvison 710 10th St, Suite 100 Golden, CO 80401	The American Alpine Club	Approval Process for New Routes. The AAC appreciates the agencies recognizing that the climbing in BENM located in and around Indian Creek is world famous and important to the local recreation economy. The climbing activity specific management proposal is of particular interest to our membership and impacts climbers worldwide. We support the recommendation that, replacement of existing bolts, anchors, and fixed gear would be allowed on existing climbing and canyoneering routes as needed for safety reasons without prior authorization. In regard to the approval of new routes which require fixed anchors we recommend that, where appropriate, the agencies in collaboration with the BEC and delegated climbing organizations/representatives consider programmatic approval of routes for specific zones when considering the overall new route approval process. We also recommend that an interim process of route approval be developed prior to implementation in order to ensure that new routes can be considered by land managers and the BEC while the new process is under consideration, avoiding a de facto moratorium on new route development. For both the interim and final climbing management plans we recommend that local climbers and climbing organizations be engaged in the process for substantive input to inform those plans.	ALT05-Alternative E, REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input. Before the route approval process is established, routes will be reviewed on a case-by-case basis.
17985-1	Dan Galliher		Users need more information regarding potential permits and fees for climbing, hiking and other "suitable" activities. Day use and back country permits are already required in BENM. How will this change? Will we still be able to pay at the trail heads? Etc.	ALT05-Alternative E, REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
18610-7	Kate Mabry		Enact a zoned approach to recreational management similar to that utilized in Grand Staircase Escalante National Monument in the use of our public lands to ensure their protection and enjoyment for future generations.	ALT05-Alternative E, REC01-General	The Proposed Plan employs a zoned approach to recreation management.
18668-6	Vanessa Soncco		Remove current federal guidelines for recreation specific area permitting and empower the zoned approach as suggested by Alternative E as most forms of recreation are inappropriate in sacred spaces.	ALT05-Alternative E, REC01-General	The Proposed Plan employs a zoned approach to recreation management. The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities commensurate with the protection of BENM objects (see Appendix E for more details). The BENM is managed under FLPMA and also under additional BLM policy, where consistent with protection of Monument object and the governing Proclamation. Proclamation 10285 clearly identifies recreation as a use within the Monument that contributes to both the experience of visitors and local economies. As such, the BLM Recreation Planning Framework, which is applicable within Monuments as per both BLM Monument and BLM Recreation policy, is applicable within BENM.
18688-4	Ken Fitch		Many who have been aware of the wonders of Bears Ears have kept it secret for many years to protect the area from vandalism, which has emerged as a major issue, so it is very important there be guidance, interpretation and also protection from easy access through careful routing, and a public interface that avoids an over-emphasis on a recreational experience, replaced with a primary TEK focus on the sacred character of these lands. The challenge here is implementation, that may need some priority focus determinations as there is so much public attention on the National Monument, with increased interest in visitation.	ALT05-Alternative E, REC01-General	The agencies, in collaboration with the BEC and other Tribal nations, will design educational materials and programs to educate visitors about Tribal perspectives on the Monument and its objects and uses. See the Cross Cultural Education and Outreach section of the Proposed Plan for more detail about an implementation-level Interpretation Plan. In addition, Appendix E contains specific management actions and implementation level decisions regarding interpretation and resource protection within Management Areas and Sub-Areas.
2026-5	Ainsley Cathcart		Adopt Alternative Es zoned approach to recreation and visitation because it will maintain quality recreational experiences for all visitors while also protecting cultural sites, preserving sensitive backcountry areas, and ensuring wildlife habitat connectivity.	ALT05-Alternative E, REC01-General	The Proposed Plan employs a zoned approach to recreation management.
5740-3	Roger Jenkins 588 Evening Star Ln, Bozeman, MT 59715 BOZEMAN, 59715		On Page E-1, I found this quote: The BEC does recognize recreation as an appropriate use of public lands within the BENM. The BEC did not parse this statement, (which they could have) by denoting the types of recreation that would be inappropriate. (The BEC says later that recreation will have to be managed, but such does not dampen the response to the quote. Frankly, without self-propelled recreation (eg, hiking, backpacking and maybe some llama supported backpacking) there would be NO CONSTITUENCY for a Bears Ears Natl Monument outside the tribes themselves. I found that	ALT05-Alternative E, REC01-General	Thank you for your comment, the statement has been removed under the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			statement to be very nave. I developed my appreciation for the cultural resources in the BENM thru backpacking and day hiking. Those activities, to me, are recreation. My suggestion would be to leave that particular statement out of the final RMP and recommended Alternative, as it hints to a naivety that suggests the proponents are not ready to get serious about management. Either that, or specifically call out what sorts of recreation that the BEC deems inappropriate (off-road OHV travel?).		
8953-4	Joseph Allen		Implement a zoned approach to recreation management should be adopted to direct concentrated use and development for recreation where it is most appropriate. This will serve further protect the monument over time.	ALT05-Alternative E, REC01-General	The Proposed Plan employs a zoned approach to recreation management.
9372-6	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Under alternative E, on page 29, it is open to the development of facilities. Facilities and infrastructure require a clear and concise budgetary business plan. With the lack of any type of financial explanation in this draft plan, it would be irresponsible for plans of this nature to be discussed at this point in the planning process. It would be more beneficial to have that discussion in a later, specific scope planning meeting. Additionally, under the first purpose of Proclamation 10285, protecting landscapes is vital to this scope and additional facilities and infrastructure will impact the beautiful landscapes and scenery of this amazing area. At this point, we should focus on continu[ing] to manage the existing recreational facilities as noted on page 26.	ALT05-Alternative E, REC01-General	Any new infrastructure would be analyzed through an implementation level RAMP or site-specific implementation level NEPA document to ensure that the proposal would not impact the objects of the Monument. These involve a public process.
F6-6			I support Alternative Es zoned approach to recreation management. Zoned management maintains quality recreational experiences for all types of public land visitors while also protecting cultural sites and preserving backcountry resources. Zones also ensure landscape-level management by connecting low-elevation to high-elevation areas for wildlife migration, and linking to remote and undeveloped areas on surrounding lands managed by other agencies such as the National Park Service.	ALT05-Alternative E, REC01-General	The Proposed Plan employs a zoned approach to recreation management.
18238-46	Chaitna Sinha		We propose: We have provided necessary improvements to Appendix H: Travel Management Plan Criteria. These improvements are detailed in Attachment 3.	ALT05-Alternative E, REC01-General, TRAVEL01-General	CFR subpart has been corrected and NLCS language has been added. Additional changes did not substantially change the meaning of the language and were not incorporated.
18238-60	Chaitna Sinha		We propose: Because the second sentence is relevant only to the maintenance of existing trails, it should be deleted. We incorporated trail maintenance into separate management prescriptions.	ALT05-Alternative E, REC01-General, TRAVEL01-General	In the Travel and Transportation Management section of Chapter 2, the Proposed Plan reads, "Existing trails would be maintained as necessary to protect BENM objects. " The words, "best complement" were changed to "protect".
8999-23		International Mountain Bicycling Association	We also ask that the final RMP more clearly distinguish between motorized and mechanized use, and allow land managers flexibility to preserve access for bikes on trails and roads that are closed to motorized users. As currently written, Alternative E considers motorized and mechanized uses together in most cases, which could lead to certain trails being closed to bikes when a trail may be capable of supporting mechanized travel without impacting BENM objects. Therefore we urge the BLM to adopt the mechanized use components of Alternative B in the final plan so that a reasonable effort can be made to offer appropriate trail access for bikes in the BENM into the future.	ALT05-Alternative E, REC01-General, TRAVEL01-General	The BLM and USDA Forest Service will develop implementation-level travel management plans that will be guided by the landscape-scale management direction provided in this RMP/EIS. The implementation-level travel management plans will assess existing motorized/mechanized trails and routes, as well as future needs and opportunities.
12832-11	Jason Keith 243 Aspen Avenue Moab, UT 84532	American Mountain Guides Association	The AMGA supports plan proposals that encourage monument visitors to use existing trails but allows appropriate off-trail travel. We also support modifying management standards for the Outback and Remote management areas in Alternative E to allow for the selective development of minimal infrastructure to prevent and mitigate recreational use into the future. This plan cannot foresee all potential future uses and there should be an adaptive planning mechanism that can ensure the protection of BENM objects by allowing for new trails and other mitigating actions while also complying with strong visual resource management objectives. Guides support preventing any visual change to the BENM landscape but believe it could be beneficial to allow for very selective recreation infrastructure developments (minimal trails and signs) to help prevent future impacts to BENM objects.	ALT05-Alternative E, REC01-General, VIS01-General	In the Recreation and Visitor Services section, under the proposed action, the Zones have been redrawn in a way that more closely reflects the existing and desired conditions. The Outback Zone description has been clarified to allow for small infrastructure where needed to protect BENM objects.
12438-10	Josh Ewing PO Box 328 Bluff, UT 84512		The Preferred Alternative would require all pets to be on-leash in the entirety of the 1.35 million-acre monument, with no exception for hunting dogs, ranching dogs, or service animals. This means that areas trampled by cattle, logged for timber, and blazed by ATVs would become places pet-owners now have to walk with dogs on leash. Not only does this dramatically reduce the ability of dog owners to get their dogs sufficient exercise, but it would also be dangerous to require hikers to have their dogs on leash while covering difficult terrain that requires the use of both hands and feet.	ALT05-Alternative E, REC02-Visitation and Visitor Experience	The Proposed Plan more clearly defines exceptions to the term "pet," to exclude dogs when actively engaged in activities such as hunting and herding, and also service animals. The Proposed Plan defines areas that are not appropriate for off leash pets developed in consideration of potential impacts that could result from pet use, related to Visit with Respect practices, and where appropriate, manageability considerations.
12438-6	Josh Ewing PO Box 328 Bluff, UT 84512		The current RMPs exceedingly weak language allowing for camping in previously used sites means that one careless camper, camping for one night at an illegal spot, creates an effectively permanent new campsite. During high-traffic weekends or events, this means numerous new sites are created, constantly expanding the impacts of camping. By my reading, the preferred alternative does not clearly carry through even this relatively weak protection of requiring camping in previously used sites.	ALT05-Alternative E, REC02-Visitation and Visitor Experience	The Proposed Plan requires development of implementation-level Recreation Area Management Plans to manage camping consistent with the proper care and management of Monument objects and values. The implementation-level Recreation Area Management Plans will be developed in collaboration with the BEC after the adoption of approved RMP and will allow for additional public and stakeholder involvement, Tribal consultation, and consideration of the preferred approach for camping management in BENM.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15528-1	John Sterling 1976 NW 2nd St Bend, 97703-1204		The Preferred Alternative limits day or overnight parking to designated parking areas at trailheads in the Cedar Mesa. Because there are so few designated trailheads in the Cedar Mesa area, this would be an effective ban on using a huge portion of the Monument that is frequently used by hikers, backpackers. While the area encompassed by in the Cedar Mesa is not defined in the plan, a reasonable assumption would be that it would include everything in the current Cedar Mesa RMZ, which includes the Comb Ridge. This would be a complete ban on use of the Comb Ridge, as there is not a single designated trailhead between highways 163 and 95. Before banning overnight parking to designated parking areas and trailheads, please establish such amenities to allow responsible visitation to the many spectacular sites within the Monument.	ALT05-Alternative E, REC02-Visitation and Visitor Experience	The management action to limit parking in Cedar Mesa to designated parking areas has not been carried forward under the Proposed Plan.
17015-2	Kestrel Kunz	American Whitewater	San Juan River Management We appreciate that the San Juan River segments within the planning area will continue to be managed under the existing permitting system. However, we do have concerns about the proposed changes to camping and the requirement for day use in all canyons. Under Alternative E, a new reservation process would be implemented for river campsites on all sections of the San Juan River in the monument, but the specifics on when and how this process would be undertaken is not clear. American Whitewater asks that there be a public process for making any future changes to camping along the San Juan River and that both self-guided river users and outfitters be consulted directly. If done poorly, a new reservation system for camping could be confusing and cumbersome for river users who already had to navigate a tricky and competitive lottery system to get on the river. It should also be clarified if campsite reservations would apply to the entire upper and lower San Juan River segments or just on the portions of the river within the Bears Ears boundary. Overall, we support a future planning process to reexamine camping on the San Juan River if it prioritizes a quality multi-day river experience, fairly balances self-guided and outfitted trips, and has a robust public input process.	ALT05-Alternative E, REC02-Visitation and Visitor Experience	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E. The details of this reservation process will be developed under implementation-level planning, which will involve a public process. This process will include management direction for the San Juan River in and outside of BENM and in coordination with Glen Canyon NRA and the Navajo Nation.
17015-3	Kestrel Kunz	American Whitewater	Additionally, Alternative E proposes to implement permits for day-use on all canyons in the monument. This is overly restrictive and goes beyond management action recommended by the BEC. This is especially confusing for activities and areas that are already permitted, including the San Juan River. Currently, people interested in undertaking a self-guided trip down the San Juan River must win a permit through a lottery system to access the river and then acquire a separate permit to hike or camp on the river left on the Navajo Nation. If there were a third permit required that had yet another process, it would be overly cumbersome and lead to confusion. During a May 1 presentation on the Bears Ears DEIS, the BEC expressed similar concern with the day-use permit requirement for all canyons, stating that was not something that the Commission had recommended. American Whitewater requests that the Final Plan provide more clarity on the intent of this stipulation and how it may be implemented in places like the San Juan River.	ALT05-Alternative E, REC02-Visitation and Visitor Experience	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E.
17599-3	Byron Harvison 710 10th St, Suite 100 Golden, CO 80401	The American Alpine Club	Permitting. The proposal to develop a Monument permit system that would require a permit for all private overnight and day use in all canyons is a dramatic departure from current practices. If the intent is to simply account for the general number and whereabouts of visitors on a no-cost basis then the AAC supports that proposition provided it has varying methods of registration accommodating various ability levels (i.e., in-person, web-based, etc). If the recommendation is for a permit fee structure, we would request an opportunity to see the specific proposed permit fees prior to making recommendations on a permitting plan. However, we do generally support increased management of the resources at BENM and understand permitting may be a requisite component of efficient management of the resources.	ALT05-Alternative E, REC02-Visitation and Visitor Experience	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E. Some permit fees are set at a Departmental level, but the fees for Individual Special Recreation Permits are typically set through a Business Plan, which involves a public process and input from a RAC.
18556-6	Stan		Only a small percentage of the public can hike long distances. In the BLMs preferred alternative, anyone with a disability, injury, old age, or even small children cannot enjoy Arch Canyon. The BLM should adopt inclusive policies that allow the disabled and others who are disadvantaged to visit Arch Canyon.	ALT05-Alternative E, REC02-Visitation and Visitor Experience	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon.
18987-7			The blanket leash ban in Alternative E is overly restrictive on recreationists and should not be selected. The pet restrictions in Alternative B provide a balanced approach to protecting resources while allowing an existing use of recreation to continue in a manner aligned with the historic recreational use of the area. Additionally, there is no methodology or analysis provided in Alternative E to explain why a blanket leash ban is more effective. Voice control is a sufficient means of accomplishing the same outcome. Please do not select a blanket leash ban in Alternative E in the final plan.	ALT05-Alternative E, REC02-Visitation and Visitor Experience, DATA02-Inadequate Methodologies	The Proposed Plan more clearly defines exceptions to the term "pet," to exclude dogs when actively engaged in activities such as hunting and herding, and also service animals. The Proposed Plan defines areas that are not appropriate for off leash pets developed in consideration of potential impacts that could result from pet use, related to Visit with Respect practices, and where appropriate, manageability considerations.
18858-3	Lucia Christensen		Continuing on camping, page 2-103 states: Dispersed camping: -No dispersed camping would be allowing [sic] within 0.25 mile of surface water, unless in an existing or designated campsite or area. - No dispersed camping would be allowed within 0.25 mile of a developed campground. -The agencies, working collaboratively with the BEC, would designate campsites and areas to help guide and focus visitors to appropriate places -The agencies, working collaboratively with the BEC, would remove and reclaim existing campsites and areas, as necessary, to protect Monument objects, including cultural resources, wildlife, and water resources... Anyone who spends time in the Indian Creek area can see that new dispersed campsites pop up every year. However, there is a massive demand for camping in the area. Rather than entirely eliminating these campsites, I would suggest that Backcountry	ALT05-Alternative E, REC03-Dispersed Recreation (where there are no formal recreational facilities)	Under the Proposed Plan, new campgrounds and designated dispersed sites may be developed in Indian Creek. During implementation level planning, methods of fee collection, such as use of recreation.gov (including Scan and Pay which does not require internet connectivity), would be evaluated. New fee considerations go through a public process in the Federal Register and are considered by the BLM Utah Recreation Advisory Committee.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			dispersed sites become designated campsites (i.e. first come first served but camping is only allowed in designated sites). I DO NOT think that any permitting should be done via recreation.gov given the poor cell phone receptions throughout the entire corridor. Another option would be to expand the Creek Pasture, Hamburger Rock & Superbowl campgrounds or add an addition campground.		
17617-11	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	BEP supports the prohibition of climbing on cultural sites to minimize impacts on cultural resources. We suggest that the language in Alternative E be made more specific to prohibit climbing in the vicinity of cultural sites. BEP is also supportive of the policy in Alternative E dealing with new climbing routes: Any new climbing routes that require the placement of bolts, anchors or fixed gear requires approval from the agencies, who would work collaboratively with the BEC to determine whether the route is appropriate to protect Monument objects, including cultural resources and wildlife, as informed by Traditional Indigenous Knowledge.	ALT05-Alternative E, REC04-Developed Recreation Sites	Suggestion for interim authorization has been incorporated into the Proposed Plan, in the Recreation and Visitor Services section. Before the route approval process is established, routes will be reviewed on a case-by-case basis. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. Discussion and planning about authorizing areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
18910-2	Heather		The one change I would suggest making to Alternative E is allowing a larger group size limit for overnight hiking trips. The outdoor program I work for takes groups of 15 students and 3 instructors into areas of Bears Ears where groups of that size are currently allowed. This program provides some really incredible education opportunities to students and strongly prioritizes respect for the land and cultural sites. These groups often travel deep in the backcountry in areas where it is uncommon to encounter other visitors. I worry that a reduction in the allowable group size would make it difficult for that program to operate (trips with smaller group sizes are more costly to run). I hope that the managers of Bears Ears can work with organizations like this to find a way that they can continue to use these lands respectfully and partner in educating people on how to protect this special place.	ALT05-Alternative E, REC05-Commercial, Competitive, and Organized Group Recreation	While the Zones establish group size thresholds for casual (non-permitted) use, current allocations and group sizes for commercial use would remain in place until implementation planning is completed.
1195-6	Lee Stanfield		You must close the monument to target shooting. It is incompatible with the values the national monument protects and it threatens birds and wildlife, water quality, cultural resources, natural quiet, and the environment.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
1327-6	Seth Roseman		Please adopt the preferred alternative's plan to close the monument to target shooting. Target shooting is incompatible with the values the national monument protects and poses a threat to birds and wildlife, water quality, cultural resources, natural quiet, and the environment.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
1383-6	southern Utah resident		Ban target shooting in the monument Bears Ears isnt a gun range, and its too important to be treated like one. Millions of acres of multiple-use public lands are open to recreational shooting in Utah, but Bears Ears is different. Target shooting is incompatible with the areas status as a national monument and it threatens birds and wildlife, water quality, cultural resources, natural quiet, and the environment. Banning target shooting in Bears Ears will still allow for hunting while keeping the environment mostly lead-free.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
1538-4	Susan Ordway		Please adopt the preferred alternatives plan to close the monument to target shooting. Target shooting is incompatible with the values the national monument protects.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting.
1826-9	George and Frances Alderson 112 Hilton Ave. Catonsville, MD 21228		No Target Shooting: We support the measure in Alternative E barring target shooting within monument boundaries. It is risky to other visitors health if people are allowed to set up targets and blast away. One of my friends enjoyed target shooting, but he didnt do it in a place where other people were coming to find a quiet day in the canyons.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
18610-3	Kate Mabry		BAN target shooting.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting.
2146-5	James Thompson		I support Alternative Es closure of the Monument to target shooting, which is in direct conflict with the protection of the natural and cultural resources and values identified in the designating Proclamations.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
6813-6	Debbie Justice		My last comment is regarding the banning of target shooting in the Monument as outlined in Alternative E. Target shooting threatens the health and safety of all visitors to the Monument, as well as the natural quiet they come to enjoy. It also causes distress for the wildlife both because of the noise and the danger of lead.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
7958-4			Under the Preferred Alternative E, recreational shooting would not be allowed. I support this position as I frequently find such sites are left with spent brass, trash, broken glass, spray painted rocks, etc. These sites often involve driving off road. As this is now a national monument and needs to be managed as such, the public has plenty of other public lands in San Juan County where they can conduct recreational shooting.	ALT05-Alternative E, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
12732-4	Patricia Becnel		7. Complete baseline studies on soil crusts to ensue protections for soil health.	ALT05-Alternative E, SOILS01-General	The Soil Resources section of the Proposed Plan states agencies would identify areas with BSCs and classify those crusts to best protect them. Additionally, Traditional Indigenous Knowledge and Tribal policies and guidelines, peer-reviewed literature based on the best available Western science, and best management practices would be applied to restore soil crusts.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18082-47	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS indicates that soil surveys do not contain information on the amounts or types of biological soil crusts (BSCs) that may occur on each soil map unit, nor have survey data been collected within the planning area as these data are not required for this planning effort. However, Table 3-10 describes statistics for any hit for cyanobacteria, lichen, and moss at BLM AIM plots within BENM which are aggregated by watersheds (p. 3-36). According to the Draft EIS, Comb Wash, Grand Gulch, Harts Draw and Lime Creek San Juan River have the highest mean and median of hits. We support the management action/commitment in the Preferred Alternative that, Agencies collaborate with the BEC [Bears Ears Commission] in identifying areas with BSCs and classifying those crusts to best protect them. These protections could include seasonal closures of areas to visitation during drought periods and ceremonially and traditionally important times of the year or permanent closures of areas with high BSC density. We recommend the Final EIS include a timeframe for completion for identifying and mapping BSCs.	ALT05-Alternative E, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	Under the Proposed Plan, agencies, in collaboration with the BEC, would identify areas with BSCs and classify those crusts to best protect them. The Availability of Data and Incomplete Information section states that qualitative discussion may be used where quantitative information is not available. Appendix N and K have been revised to state that AIM data collects information about BSC presence and cover.
18238-1	Chaitna Sinha		Allowing for discretionary actions on sensitive soils may be detrimental to BENMs ecosystem functionality and therefore, is inconsistent with the direction of the Proclamation. We propose: Alternative E should incorporate the following management action from Alternative B: if SMUs indicate that discretionary actions are within areas with sensitive soils, consider further restricting activities to assure control of soil erosion within acceptable levels. DEIS, Vol. 1, p. 2-17, Table 2-4. Additionally, the Agencies should include further stipulations related to soil's susceptibility to degradation rating. If soils are rated as highly susceptible, discretionary actions should be restricted.	ALT05-Alternative E, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	The language from Alternative B has been added to the Proposed Plan.
18238-2	Chaitna Sinha		We appreciate the goal to increase understanding of biological soil crust management through research and TEK. This is a notable example of the collaborative management and resource protections for which BENM was designated. To honor this commitment, however, Alternative E should be modified to include specific, measurable, and time-bound goals regarding BSC inventories. We propose: Add language requiring the inventory and classification of BSC within the Monument be completed within 10 years of signing the ROD. For any surface-disturbing discretionary actions planned prior to the 10-year deadline, all BSC should be inventoried prior to implementation. This will contribute to the final inventory while ensuring the protection of Monument resources.	ALT05-Alternative E, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	Under the Proposed Plan, agencies, in collaboration with the BEC, would identify areas with BSCs and classify those crusts to best protect them. Specific impacts analysis for BSCs will continue to occur during implementation level project specific analysis in collaboration with the BEC.
6813-8	Debbie Justice		I am also in favor of Alternative E's use plan to follow traditional Indigenous methods and techniques for vegetation management. These considerations should also include timber management, the prohibition of chaining and the restoration of heirloom plants where non-native species have invaded. This also will protect both animal habitats and provide fire suppression.	ALT05-Alternative E, TIK01-Traditional Ecological or Indigenous Knowledge	Proclamation 10285 directs the agencies to include Traditional Indigenous Knowledge and expertise in the management of BENM. In the Vegetation section of Chapter 2, the Proposed Plan says that vegetation management would include all available tools, including mechanical methods, consistent with the protection of BENM objects. No chaining would be allowed and light-on-the-land techniques would be used where practicable. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and vegetation resilience section and Cultural resource section in Chapter 3 for discussion of impacts to vegetation and cultural resources, respectively, from vegetation management.
14767-143	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under Alt E which will not be chosen: Traditional Indigenous Knowledge and Tribal policies and guidelines, peer-reviewed literature based on the best available Western science, and best management practices would be applied to restore soil crusts. What is this TIK and tribal policies and literature? It could be anything. How about lets pray over it. What are these mythical best management practices? When will they be required? What actions will they be required for? How effective have they been proven to be? All these basic questions that a NEPA document are supposed to answer, the EIS is entirely silent. Faith-based public land management is not allowed under the FLPMA planning regulations and directives.	ALT05-Alternative E, TIK01-Traditional Ecological or Indigenous Knowledge	Traditional Indigenous is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. As stated in the Traditional Indigenous Knowledge section, it is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives.
9127-1	Adam Auerbach		Support Increased Land Protections and Tribal Co-Management (Alternative E): With refinements from Alternative D and the Bears Ears Inter-Tribal Coalition Land Use Plan, this combination allows for the greatest incorporation of Traditional Ecological Knowledge into management. The intimate knowledge of landscapes in traditional methods of land management often results in less impactful and more successful outcomes.	ALT05-Alternative E, TIK01-Traditional Ecological or Indigenous Knowledge	All alternatives were developed in collaboration with the BEC and Tribal Nations to incorporate Traditional Indigenous Knowledge. The Proposed Plan in the Cross Cultural Education and Outreach section further discusses the incorporation of Traditional Indigenous Knowledge in BENM management.
10678-4			I support the closure of motorized routes that harm monument objects and values, including springs, riparian areas, vegetation, soils, and cultural objects. Widespread off-road vehicle use should not be allowed, and no additional routes should be designated.	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. Proclamation 9558 (incorporated by reference into Proclamation 10285) limits designation of new routes within BENM to those needed public safety or protection of BENM objects. The Proposed Plan does not have any areas designated as OHV open. See The Water Resources, Vegetation, Soil Resources, and Cultural Resources sections of Chapter 3 for a discussion of impacts on the resources provided in the comment from OHV use.
1327-5	Seth Roseman		Please follow through with the closure of Arch Canyon to off-road vehicles, as it will better protect water quality in the canyon's rare perennial stream, safeguard the canyon's abundant and irreplaceable cultural sites, and promote quiet and contemplative visitation.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14108-2	Stacia Lewandowski		Alternative E would offer the zoned approach to recreation management – to me, this is an imperative. I go to Bears Ears to experience its quiet solitude, and to appreciate the many wonders of the cultural heritage it holds. This type of experience needs to be protected for future generations. While I know there are people who want to use the area for motorized riding, that should be kept to strictly limited areas, and certainly not in places of cultural significance.	ALT05-Alternative E, TRAVEL01-General	The Proposed Plan employs a zoned approach to recreation management. The Proposed Plan does not designate any OHV open areas. The agencies will conduct implementation travel management planning.
15442-3	Jon Guggenheim		Please follow through with the closure of Arch Canyon to off-road vehicles because it will better protect water quality in the canyons rare perennial stream, safeguard the canyons abundant and irreplaceable cultural sites, and promote quiet and contemplative visitation.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor’s suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
15555-1	Mary Moran 1991 Highland Dr Moab, UT 84532		Please do not weaken aspects of Alternative E in the final management plan. In particular, retain the closing of Arch Canyon to motor vehicles. Canyons with perennial streams and rich riparian habitat are such important, rare and key ingredients for life in the surrounding desert, for so many types of wildlife. Off-road vehicles do too much damage, and their noise impacts too many wildlife, to be compatible with responsible management. Vehicles also are much more capable of, and likely to, damage cultural sites than other visitors.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor’s suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
1574-2	Karen Naiman Denver, CO 80247-3020		I support Alternative Es closure of Arch Canyon to motorized use. In addition, Alternative E should expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor’s suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
16038-1	Diane Wolfe		I am writing today regarding the draft Bears Ears Management Plan. I support an improved Alternative E. [...] While closing Arch Canyon completely to OHV traffic is by far the best alternative, if that cannot be accomplished without expensive and delaying litigation, perhaps consider inviting those who truly have experience and hope to continue to use Arch Canyon for OHVs meet in person with representatives from the tribes to create a compromise that will respect all sides. (i.e. keep those who just want to thwart the government and have no intention of ever coming to southern Utah out of the conversation.)	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor’s suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
16940-2	Christopher Lish 1004 Los Gamos Road Apt. D San Rafael, 94903		I strongly support Alternative Es closure of Arch Canyon to motorized use. A motorized route in Arch Canyon currently crosses a rare perennial desert stream dozens of times, damaging an important water source and habitat for plants and animals. The whine of two-stroke motors echoes for miles beyond the canyon as vehicles spew oil and petrochemicals into the creek. Closing Arch Canyon to off-road vehicles will better protect water quality in the canyons rare desert stream, and better safeguard the canyons abundant and irreplaceable cultural sites while promoting quiet, contemplative, and respectful visitation. In addition, Alternative E should expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage. Please improve Alternative Es management of off-road vehicles on monument lands adjacent to neighboring National Park Service areas by prohibiting routes up to park boundaries to minimize trespass and further preserve natural soundscapes, visual resources, clean air and water, and wildlife habitat both in the Monument and the parks.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor’s suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands. See sections on Visual Resources, Soundscapes, Wilderness, and Travel, Transportation, and Access Management.
17358-8	Ramona Blaber Oak Park, IL	Sierra Club	We did however observe that ORV traffic had damaged some areas and petroglyphs. We urge making sure there is plenty of signage letting ORVers know where they should not go, and enforcing ORV closures.	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, travel routes would be well marked (see the Travel, Transportation, and Access Management sections), which would inform OHV operators in knowing where they should and should not go. Route closure and enforcement mechanisms will be specified in a future implementation-level travel management plan.
17998-3	Ronald Wilkinson		Off course, motorized may be suitable in certain areas of the Bears Ears but it should be restricted to roads and services already in place.	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSA’s, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. The standard limitation is limited to designated routes, but additional limitations including but not limited to limitations of season of use or type of vehicle may be applied. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources section in Chapter 3 for a discussion of impacts of OHV designations on paleontological resources.
18082-45	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Unlike Alternatives C and D, the EPA notes that the Preferred Alternative does not close OHV use in BLM-administered lands managed for wilderness characteristics. ¹⁷ In the BEITC LMP, Tribal members note a series of concerns with OHV use within the planning area, such as the spread of invasive species, wildlife impacts, noise and water pollution, dust, erosion, plant disturbance, and impacts to ancestral sites (Appendix L, pages 35-36). The EPA shares these concerns and notes that many of these negative impacts are well-documented. ¹⁸ In addition, Tribal members mention remote locations within the BENM as areas of particular concern for OHV use. For example, Tribal members express the concern that [All-Terrain Vehicles] ATVs provide access to archaeological sites in remote locations where the potential for vandalism and pothunting is high because of the remoteness and sense of isolation (Appendix L, page 36). Since the Preferred Alternative seeks to maximize Tribal input, the EPA recommends discussing these concerns in the Final EIS and considering additional OHV restrictions in BLM-administered lands managed for wilderness characteristics or other sensitive areas under the chosen alternative. As part of this, the EPA recommends discussing any benefits to Tribal members from not closing OHV use in BLM-	ALT05-Alternative E, TRAVEL01-General	The Proposed Plan was developed in close collaboration between the agencies and the BEC. Under the Proposed Plan 859,983 acres would be open to wood product harvest, in accordance with applicable law. Through implementation level planning, the agencies, in collaboration with the BEC can close or place restrictions on areas that are available for wood product harvest on a seasonal or multiyear basis, focusing on areas where site-specific analysis indicates the continuing harvest of wood products would impact vegetation communities and cover, soil, wildlife habitat, and cultural resources. Areas available and unavailable to wood product harvest and the impacts to EJ populations were considered in the development of the Proposed Plan. The BEITC LMP specifically calls out the traditional need to harvest firewood from BENM, in addition to other access needs for herbs, medicine, and hunting. A discussion of impacts can be found in the Environmental Justice and Social and Economic Values section. Under the Proposed Plan, WSA’s, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			administered lands managed for wilderness characteristics, such as allowing access for traditional activities (e.g., wood gathering). If such benefits are present, the EPA recommends considering OHV closures for BLM-administered lands managed for wilderness characteristics but allowing exceptions for Tribal members. We believe these actions would help preserve the unique soundscape of the BENM, which Proclamation 9558 names as a value of the Monument and the Draft RMP and EIS notes is among the quietest in the lower 48 states but is also facing projected degradation, in part due to OHV use (pages 3-253 to 3-254). Finally, the EPA recommends seasonal restrictions on OHV use throughout the BENM during the wintertime quiet season, as discussed by Tribal members (Appendix L, page 23).		
18238-47	Chaitna Sinha		Manage the transportation system so it provides safe and reasonable access while protecting BENM objects. DEIS, p. 2-116 (Goals and Objectives). We propose: Manage the transportation system in collaboration with the BEC to protect BENM objects and values while providing safe and reasonable access.	ALT05-Alternative E, TRAVEL01-General	The Proposed Plan/Final EIS in the Travel and Transportation Management section of Chapter 2 states that a goal and objective would be to manage the transportation system in collaboration with the BEC so it provides safe and reasonable access while protecting BENM objects.
18238-48	Chaitna Sinha		Ensure that travel and transportation management facilitate appropriate use and interaction with the cultural landscape of BENM. Ensure the travel network supports education and protection of BENM objects by siting roads and trails in locations that allow the public to better understand the cultural landscape in a manner that is consistent with the protection of BENM objects. Id. We propose: Ensure that travel and transportation management incorporates Traditional Indigenous Knowledge to facilitate appropriate use and interaction with the cultural landscape of BENM. Ensure the travel network supports education by siting roads and trails in locations that protect BENM objects and values and enables the public to better understand the cultural landscape. [see letter for emphasis]	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan travel management planning will be undertaken in collaboration with the BEC which should support inclusion of Traditional Indigenous Knowledge in those implementation level planning processes.
18610-4	Kate Mabry		CLOSE Arch Canyon to off-road vehicles.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
18677-11	Benjamin Bellorado Tucson, AZ		While I support Alternative E most strongly, I feel that the Travel and transportation management in Alternative C, that would eliminate most public access of BENM for unmanned aircraft systems (UASs), except for authorizations for case-by-case landings and takeoffs through formal permitting processes, where the use is beneficial to protecting BENM objects, should be included in the accepted alternative. I believe that allowing the use of drones in the monument is a recipe for disaster and increased damage to cultural sites in Grand Gulch, the South Fork of Mule Canyon, Fish Creek Canyons, and lower Cottonwood Wash. I have seen numerous drone videos on Youtube.com of recreationalists making videos of drones flying into remote and otherwise inaccessible (or accessible only with rope work) sites and structures and causing damage to these resources. I have seen a photo of a downed/broken drone that was found in a difficult to access site, which was retrieved by another later visitor and disposed of. Several of the videos show the drones taking off, landing, or entering sites and areas of the monument where I have conducted legitimate archaeological research (with an ARPA permit and in partnership with the Bureau of Land Management) so I know that these specific sites are located in Wilderness Study Areas where flying drones is not allowed. These activities should not be allowed unless specifically in conjunction with permitted scientific research or management purposes. Certain areas of the monument, where sites can be identified from the opposite rim of the canyon and where existing trails offer easy access to these rims, are most susceptible to being flown with drones, particularly Fish Creek Canyon, McLoyd Canyon, and the South Fork of Mule Canyon. Land Managers should make efforts to patrol these canyon rims to make sure visitors are not flying drones into the sites from these vantage points. Land managers should also be permitted to persecute these cases of illegal drone usage with fines.	ALT05-Alternative E, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft, including UAS are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
18738-1	Carol Toffaleti Albuquerque, NM 87106		1. I support Alternative Es closure of Arch Canyon to motorized use. In addition, I recommend that Alternative E expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage and adjacent to national parks.	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands. See sections on soundscapes, viewsheds, wilderness, and travel.
2146-2	James Thompson		So back to Arch Canyon and Bears Ears Monumnet, Alternative E should expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
6813-2	Debbie Justice		Alternative E should expand closed off areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage. There are many other places within the proposed Bears Ears Monument where OHV enthusiasts can recreate. Closing off this one special area will not interfere with these citizens' rights to enjoy the beautiful landscape using their preferred mode. It is also congruent with other national protected sites. After all, we are not allowed to bring OHVs to Ellis Island or Gettysburg. I believe this approach is fair to all and safest for this very precious area.	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSA's, protected LWC, and WSR, would be OHV closed. In addition, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. (Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands). All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources section for a discussion of impacts of OHV designations on paleontological resources.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
8953-6	Joseph Allen		Closing Arch Canyon to off-road vehicles would prevent the risk of damage to the Monument's many irreplaceable natural and cultural resources for generations to come. It will also assure that it becomes a place conducive to quiet contemplation as a respite from the noise of our modern urban lives.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
8999-1		International Mountain Bicycling Association	While the tribal co-management is long overdue, we are disappointed to see that Alternative E for the BENM does little to enhance meaningful bicycle offerings. Alternative E allows only the existing 3 miles of trails for bikes and forces any future bike travel on OHV routes while Alternative B is more supportable. The BENM Notice of Intent states under the purpose and need statement that planning decisions can help resolve conflicts between various uses and resource protection. Forcing bikes to share trails with OHV use causes conflict with OHV users. Restricting bicycle use to a mere 3 miles of shared pedestrian use causes conflict with pedestrians. These conflicts can be addressed by providing a more meaningful experience for BENM visitors looking for bicycle opportunities.	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon.
9127-7	Adam Auerbach		Motorized Route Closures: Advocate for the closure of motorized routes that harm monument objects and values, including springs, riparian areas, vegetation, soils, and cultural objects. Widespread off-road vehicle use should not be allowed, and no additional routes should be designated.	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSA's, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
9166-5	A BENM supporter		5. Please close Arch Canyon to off-road vehicles A motorized route in Arch Canyon currently crosses a rare perennial desert stream dozens of times, damaging an important water source and habitat for plants and animals. The whine of two-stroke motors echoes for miles beyond the canyon as vehicles spew oil and petrochemicals into the creek. Closing Arch Canyon to off-road vehicles will better protect water quality in the canyons rare desert stream, and better safeguard the canyons abundant and irreplaceable cultural sites while promoting quiet, contemplative, and respectful visitation.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
9188-4	Nike Stevens		I support reducing areas open to off road vehicle use as in Alternative E especially near National Park units and in riparian areas.	ALT05-Alternative E, TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSA's, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. Based on coordination with NPS, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands.
9255-14	Keith Alleman		Unlike some other alternatives, the travel/transportation bullet in Alternative E does not mention anything about management of nonmotorized and nonmechanized trails. It should, just to avoid feeling like an oversight.	ALT05-Alternative E, TRAVEL01-General	The Proposed Plan discusses non-motorized and non-mechanized trails in the Management Actions by Alternative table for Travel and Transportation Management. The recreation and Visitor Services section discusses the impacts of the Proposed Plan as it pertains to non-motorized and non-mechanized trails.
F6-2			I support Alternative Es closure of Arch Canyon to motorized use. In addition, Alternative E should expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage.	ALT05-Alternative E, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
F9-2			We ask you to strengthen the management plan to protect natural areas in a way that also allows the ongoing Indigenous access and use of these areas by: – Improving grazing management by requiring resource assessments and livestock monitoring, encouraging retirement of grazing allotments, and by protecting riparian areas, seeps, and springs from grazing impacts. – Expanding off-road vehicle closures to protect sensitive wildlands and resources. – Prohibiting mechanical vegetation treatments, protecting old-growth trees, and requiring the use of native seeds for restoration projects. – Ensuring the plan provides a holistic approach to wildlife management and the impacts of climate change. – Ensuring that the final plan provides stronger protections and treatment for endangered prehistoric architecture and all places of cultural importance.	ALT05-Alternative E, TRAVEL01-General	Thank you for your comment. See the Vegetation, Travel and Transportation Management, Livestock Grazing, Wildlife and Fisheries, and Cultural Resources sections of the Proposed Plan for management actions regarding the resources included in the comment.
18238-50	Chaitna Sinha		With the exception of existing non-motorized trails that allow mechanized travel, future mechanized travel would be limited to routes where OHV use is allowed. Id., p. 2-119, Table 2-20. This management action must clarify that mechanized travel is limited to existing designated non-motorized trails that allow mechanized use. To best protect Monument objects and prevent user conflicts, new mechanized trails should not be designated on the Monument. We propose: With the exception of existing designated non-motorized trails that allow mechanized travel, future mechanized travel will be limited to routes where OHV use is allowed. [see letter for emphasis]	ALT05-Alternative E, TRAVEL01-General, REC01-General	See the Proposed Plan column of the Management Actions by Alternative table for Travel Management in Chapter 2 which provides that mechanical use (e.g. bicycles) would be limited to routes where OHV use is allowed and to trails specifically designed for mechanical use.
18238-52	Chaitna Sinha		The second part of this management prescription states: Implementation-level travel management planning will ensure motorized and mechanized routes that parallel or cross streams would be located to best complement riparian and aquatic ecosystems as well as road/trail and stream geometry. This includes locating crossings (fords) at points of low bank slope and firm surfaces wherever practicable. Id, p. 2-122. Because this management prescription is included with the one above, it appears that it is applicable only to the designation of new motorized routes. This should be clarified. In addition, it is unclear what best complement means. The Agencies are required to protect Monument objects and values, which include riparian areas and aquatic ecosystems, as well as	ALT05-Alternative E, TRAVEL01-General, REC01-General	Under the Proposed Plan in the Chapter 2 Travel and Transportation Management section, the language was changed to, "Existing trails would be maintained as necessary to protect BENM objects." The words "best complement" were changed to "protect".

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			minimize damage to watersheds. Best complement does not suffice. We propose deleting this management action.		
18238-82	Chaitna Sinha		To respect the shared acoustical environment and prevent illegal incursions into the national parks, we recommend closing the shared boundaries with Canyonlands NP, Natural Bridges NM and Glen Canyon NRA as proposed in Alternative D from existing and future OHV use. This would ensure consistent and compatible management across boundaries and help prevent incursions into the parks along with impacts to park resources and visitor experience. The agencies should also carefully oversee the use of OHVs and should subject proposed group access to review to ensure that soundscapes within the Monument and on adjacent national park lands are protected.	ALT05-Alternative E, TRAVEL01-General, REC01-General	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands. See sections for soundscapes, viewsheds, wilderness, and travel.
18238-86	Chaitna Sinha		We propose: Delete the following management action: Implementation-level travel planning would not designate new mechanized routes in sensitive soils unless necessary to ensure the protection of BENM objects. Id., p. 2-122. This management prescription is unnecessary because, as explained previously, for the protection of Monument objects and values, and to prevent user conflicts, the Agencies should not designate new mechanized routes.	ALT05-Alternative E, TRAVEL01-General, REC01-General	Travel management planning will occur at the implementation-level phase of planning, at which time the agencies will make decisions about the designations of routes. The commenter misreads Proclamation 9558, incorporated by reference into Proclamation 10285 as a blanket prohibition of designation of new routes and trails. The Proclamations state that designation of new routes must be limited to roads and trails necessary for public safety or protection of BENM objects.
18238-10	Chaitna Sinha		We propose: The following changes should be incorporated from Alternative D (underlined), with additional changes in bold, into Alternative E. No discretionary actions that alter vegetative cover, result in stream channel instability or loss of channel cross sectional area, or reduce water quality will be allowed within 100-year floodplains or within 0.5 mile of riparian areas and along perennial and intermittent springs and streams unless absolutely necessary to protect BENM objects, it can be shown that there are no practical alternatives, and the action is designed for long-term benefits to riparian, wetland, or aquatic habitats (e.g., side channel restoration). [see letter for emphasis]	ALT05-Alternative E, WAT01-General	Thank you for your comment, your suggestions were evaluated and considered. Under the Proposed Plan no new surface-disturbing discretionary actions that alter vegetative cover, result in stream channel instability, loss of channel cross sectional area, or reduction in water quality would be allowed within the 100-year floodplains or within 1,000 feet of springs, riparian areas, or intermittent and perennial streams unless it maintains and/or improves riparian function. For management of livestock grazing within 100-year floodplains or within 1,000 feet of springs, riparian areas, and intermittent and perennial streams, see management actions in the Livestock Grazing section of Chapter 2.
18238-41	Chaitna Sinha		In the case that recreational water pumping is negatively impacting resources to the point that Monument objects are harmed, there must be flexibility to restrict water pumping in order to protect those objects. Including the possibility for restriction will give the plan the most adaptability and resilience regarding the protection of water-reliant BENM objects. We propose: One slight addition to Alternative E from Alternative C (underlined): The agencies, working collaboratively with the BEC, would monitor water resources to identify whether water pumping for recreational use needs to be limited or restricted in any specific areas in order to protect Monument objects, as informed by Traditional Indigenous Knowledge. [see letter for emphasis]	ALT05-Alternative E, WAT01-General	Comment suggests a style change with no substantive change in meaning. No change.
2026-6	Ainsley Cathcart		Reverse decades of damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils, by requiring immediate compliance monitoring and resource assessments, prohibiting new water developments, and excluding livestock grazing from perennial surface water, riparian areas, and springs.	ALT05-Alternative E, WAT01-General	The Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections of the Proposed Plan include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, the Management Actions by Alternative table in the Livestock Grazing section states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only unless a current (within the last 10 years) land health assessment has been completed.
518-2	Tanner Skaare; Nick Kemme; Andrew Evans; Joseph Lanser		Alternative E states that the BENM would remain available/suitable for grazing with the exception of selected areas that would be deemed unavailable/unsuitable. However, according to, Table 2-21 and Section 3.5.9.2.7 of the Draft Resource Management Plan Vol. 1, Alternative E would prohibit new water developments for livestock, and existing water developments would be removed unless they protect BENM objects. The removal of livestock water developments would significantly increase the pressure on natural water sources. To offset this, it is also stated that the BLM plans to erect exclosures or other physical barriers [that] would prevent livestock from directly accessing or impairing springs, seeps, and other sensitive riparian areas. Appendix 1 Table I-2 shows that the watershed acreage deemed unavailable for grazing will more than triple across the BENM, which will greatly reduce grazing opportunities if water developments are removed. Forage outside of a two mile radius from a water source is often considered unavailable to cattle, and forage between one and two miles has reduced availability because it becomes exceedingly difficult for cattle to travel further than that without suffering dehydration.	ALT05-Alternative E, WAT01-General	Under the Proposed Plan there are approximately 27,000 more acres made unavailable to grazing and about 8200 more acres limited to trailing only. This is not triple the current amount. Water developments are still allowed if they protect BENM objects. This does not preclude that the improvement of the distribution of livestock with additional water sources could be considered as a way to protect BENM objects in implementation level projects. Existing water developments would only be considered for removal or abandonment if it does not protect BENM objects.
18238-74	Chaitna Sinha		We propose that Alternative E be improved by incorporating the following proposed additions (in bold), and language from Alternative D (underlined): . Prohibit new water source development for domestic livestock unless necessary to protect BENM objects and it can be shown through tangible research that there are no alternatives to protect BENM objects. This research should be documented	ALT05-Alternative E, WAT01-General, GRAZ01-General	Under the Proposed Plan, in the Management Actions by Alternative table in the Livestock Grazing section, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. A current (within the last 10 years) land health assessment would be required for new water developments/range improvements, or modifications to

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			for the review of the BEC. Existing water developments for livestock or wildlife will be removed unless they are necessary to protect BENM objects. Prohibit modifications to existing water developments for livestock grazing purposes, unless: . The primary purpose is to protect BENM objects; and . BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed, and, if needed, a causal factor determination has been made for the allotment or applicable watershed. As informed by the land health assessment and causal factor determination, the modified water development will support the achievement of the BLM Utah Rangeland Health Standards. An exception to this requirement could be approved for modifications to water developments to prevent imminent damage to BENM objects. Livestock will be excluded from perennial surface water (except existing stock ponds). Exclosures or other physical barriers would be utilized to prevent livestock from directly accessing or impairing perennial surface water sources, such as springs, seeps, groundwater-dependent ecosystems, and other sensitive riparian areas. [see letter for emphasis]		existing water developments/range improvements. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within 3 years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewals will be guided by current land health evaluations. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
17646-4	Martha Ham Leeds, UT 84746		I support most of the provisions in preferred Alternative E, to maintain the monument's riparian zones. It is also imperative that watershed protections be maximized. Please consider including the following recommendations: - Incorporate the more expansive Aquifer Protection ACEC designation outlined in Alternative D. - Revise the grazing allotment retirement list to reflect Alternative D, while still conducting compliance monitoring and necessary livestock unit/seasonal adjustments outlined in Alternative E. -Ensure that sufficient monitoring data is collected for monument watersheds to adequately assess impaired water status. - Adjust usage management policies as needed to maintain watershed health. I urge you to prepare a Record of Decision prior to January 20, 2025, to ensure that this administration who has toiled over the future of this monument can preserve the work that goes into developing a management plan such as this.	ALT05, WAT02 Surface Water (including quality/quantity, seeps/springs, hydrology)	The Proposed Plan emphasizes resource protection and the thoughtful stewardship of the Bears Ears landscape, including consideration of natural processes and seasonal cycles, such as maintaining watershed health. The Proposed Plan would designate the 85,856 acre Aquifer Protection ACEC. As discussed in the ACEC analysis, management actions under other resources would provide similar protections to the R&I values for the Aquifer Protection ACEC. See the Livestock Grazing section of the Proposed Plan for areas unavailable to grazing.
18688-2	Ken Fitch		The protection of water resources should require serious attention in this climate and location where climate change may bring major impacts. The Indigenous Tribal Knowledge becomes especially important with regard to seeps and springs, which are essential in some areas for rare plants, some of which are used in traditional ceremonies. Tribal monitoring would be aware of changes that betoken other deficiencies and alterations of the aquatic system.	ALT05-Alternative E, WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology)	Under the Proposed Plan, agencies will collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects. Additionally, under the Proposed Plan, agencies will collaborate with the BEC to develop a spring revitalization program, protect properly functioning springs, and restore and protect springs where riparian conditions are nonfunctional and/or functional-at risk or water quality conditions are degraded from impacts using implementable protection measures.
18238-19	Chaitna Sinha		We are also cognizant of the negative effects herbicides can have on pollinators, reptiles, birds, and native plants, and herbicides are only effective in preventing the spread of noxious weeds when combined with other appropriate management actions. The Agencies should improve the final plan to reflect the need to address the root causes of noxious weed spread. We propose: Adding the following sentence: Herbicide treatments will only be carried out in conjunction with an integrative plan to address the root causes of noxious weeds and invasive plants, including determination of causal factors and identification of appropriate management actions. This will clarify for both the public and decision-makers the context in which herbicide treatments are to be utilized.	ALT05-Alternative E, WEED01-General	The Proposed Plan includes management direction to manage for the objects of BENM, including those that maybe impacted by invasive plants and noxious weeds. See the Vegetation section in Chapter 2 which includes management actions to collaborate with the BEC in control of the spread of invasives and on herbicide application as well as includes management actions to address common vectors of weeds, such as equipment.
18238-20	Chaitna Sinha		Surveys for noxious weeds and nonnative invasive plants will help identify the need for adaptive management, identify areas at risk for invasive weed spread, and serve as a useful data point for assessing overall landscape health. Also, given the relatively low-level of noxious weed and invasive plant spread across BENM this would be an important proactive measure to prevent expansion and the associated harm to Monument objects and values. We propose: Including explicit provisions for ongoing surveys for noxious weeds and nonnative invasive plants, which will be conducted annually with the BEC to determine whether additional management actions are needed.	ALT05-Alternative E, WEED01-General	Agencies would coordinate with the BEC and Tribal Nations in controlling the spread of invasive and non-native plants under all Action Alternatives (Vegetation section of Chapter 2). Ongoing surveys for noxious weeds and non-native, invasive plants are an essential component of integrated pest management and weed management planning prior to control that are supported by best management practices in Appendix G. The Availability of Data and Incomplete Information section acknowledges the need for more information to better direct management decisions, which can be obtained through annual surveys by resource, Assessment, Inventory, and Monitoring (AIM), Traditional Ecological Knowledge (Traditional Ecological Knowledge), and subsequent project-level NEPA.
18238-40	Chaitna Sinha		While we appreciate the nesting surveys mentioned above, we have concerns about the lack of specific management actions for pinyon jay in the DEIS. The pinyon jay nesting season differs slightly from other birds (generally February through May), and this species has a high nest site fidelity. We propose: Pinyon jay surveys and mitigation measures to protect pinyon jay habitat, in accordance with the 2020 Conservation Strategy for the Pinyon Jay, be included in the final plan	ALT05-Alternative E, WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	Language has been added to the Wildlife and Fisheries section under Management Actions Common to All Alternatives (for Fish and Wildlife) in Chapter 2 that acknowledges the role of consulting bird conservation plans and the Utah Wildlife Action Plan for managing migratory birds and other special status bird species.
1928-6	Robert Pazik		Future management priorities should be given to the preferred alternative in management of Wilderness Study Areas, Lands With Wilderness Characteristics, Areas of Critical Environmental Concern, and other similar special protection	ALT05-Alternative E, WSA01-General	The Proposed Plan discusses management related to Wilderness Study Areas and Areas of Critical Environmental Concern in the Special Designations. The Proposed Plan has management related to Lands with Wilderness Characteristics in the associated section.
17807-2	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Recreation According to traditional knowledge of Tribal Nations, shooting is a sacred activity as one is attempting to take a life. It is not a recreational activity.	SHOOT02-in favor of shooting closures, ALT05-Alternative E	See Proposed Plan under the Recreation and Visitor Use section. BENM is closed to target shooting in the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
2026-7	Ainsley Cathcart		Adopt Alternative Es closure of the Monument to target shooting, which is in direct conflict with the protection of natural and cultural resources and values. It threatens the health and safety of all visitors, as well as the natural quiet they come to enjoy.	SHOOT02-in favor of shooting closures, ALT05-Alternative E	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
9166-6	A BENM supporter		6. Please ban target shooting in the monument Bears Ears isnt a gun range, and its too important to be treated like one. Millions of acres of multiple-use public lands are open to recreational shooting in Utah, but Bears Ears is different. Target shooting is incompatible with the areas status as a national monument and it threatens birds and wildlife, water quality, cultural resources, natural quiet, and the environment. Banning target shooting in Bears Ears will still allow for hunting while keeping the environment mostly lead-free.	SHOOT02-in favor of shooting closures, ALT05-Alternative E	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
18657-24	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	It is abundantly clear from the management guidelines proposed by each alternative that not one of the five alternatives presented is pro-recreation. A pro-recreation alternative would retain all existing recreation opportunities in the monument as open, including all currently designated motorized routes. A pro-recreation alternative would integrate public education, mitigation of potential resource damage, along with thoughtful and relevant means to increase public awareness, appreciation, and value for protection of cultural and natural resources into the management policy and protocol. It is critical to emphasize that management by closure is not management; rather, this method of management serves to banish the public from the opportunity to access and enjoy our public lands. There are many effective strategies to manage public lands, including BENM, by means other than zoned blocks for elimination of public access, road closures, activity bans, group size limits, and exclusion zones. We advocate for the BENM RMP planning managers to immediately halt any further advance of the current draft RMP, in order to create a new pro-recreation alternative (in collaboration with all BENM stakeholders) that would involve active management techniques such as constructing new infrastructure to sustainably handle increased visitation; this would include new trails, trailheads, parking areas, bathroom facilities, campgrounds, etc. Then after a pro-recreation alternative is drafted, release the revised RMP for public comment. This is an essential step to ensure that the RMP accurately aligns with the legal and procedural dictates that direct the BLM, Forest Service, and national monument public land planning. It is possible to manage the natural landscape in a manner that protects monument objects, conserves the land and wildlife habitat, respects local indigenous history and heritage, and retains the rugged, wild characteristics of the landscape, while also creating appropriate places, structure, and guidelines for all public stakeholders to access, enjoy, and recreate throughout BENM.	ALT06-Proposed, NEW	The Purpose and Need (Chapter 1) of the Draft RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape." Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Chapter 2. The agencies underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
889-10	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	There is no alternative currently under consideration which could be reasonably described as pro-recreation. A pro-recreation alternative would keep open all existing recreation opportunities in the monument (including all currently designated motorized routes) and would manage it by means other than closure. Instead of road closures, activity bans, group size limits, and exclusion zones, a pro-recreation alternative would involve active management techniques such as constructing new infrastructure to sustainably handle increased visitation, including new trails, trailheads, parking areas, bathroom facilities, campgrounds, etc. While some of the alternatives allow new recreation facilities to be built, none emphasize it, but instead emphasize closures and restrictions. This is unacceptable. A pro-recreation alternative that actively manages recreation within the monument and views it as a positive thing rather than a nuisance to be eliminated is a viable alternative that is completely compatible with protecting monument values and objects. The agencies have other tools in their toolbox to manage recreation besides closures, bans, and other forms of restrictions. Only unmanaged recreation can be reasonably construed as a threat to monument objects, not recreation in general. We note that the 2021 monument proclamation specifically mentions the importance of the world-class recreation opportunities in the monument to local communities, and indicates a clear intent to allow these activities to continue. If recreation is viewed as a positive good and actively managed with the proper infrastructure, visitor education, and enforcement of existing rules, it does not pose any threat to monument values and provides a net benefit to all. Currently, alternative A is the closest thing the agencies are considering to a pro-recreation alternative at all, and alternative B is the closest to a pro-recreation action alternative, though even that alternative excessively prioritizes conservation over recreation. However, we are aware that as with any NEPA proceeding, the no-action alternative is purely a pro forma exercise and is never seriously considered for adoption. It is therefore vital that the agencies consider an action alternative which emphasizes recreation as a positive good and uses active management rather than closures to manage it. We therefore urge the agencies to add and fully analyze a pro-recreation action alternative in the final EIS.	ALT06-Proposed, NEW	The Purpose and Need (Chapter 1) of the Draft RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape." Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Chapter 2. The agencies underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
18965-14	Simone Griffin	BlueRibbon Coalition	The Executive Order on Advancing Equity also recognizes that poverty and inequality can lead to systematic discrimination against historically underserved and marginalized communities. We strongly encourage the BLM to incorporate into their planning the findings of The Slums of Aspen: Immigrants vs. the Environment in Americas Eden by Lisa Sun-Hee Park and David Pellow and Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West by Justin Farrell. Both of these works document extensively how Western communities surrounded by public land are undergoing significant socioeconomic changes that result in skyrocketing housing costs, use of conservation and land-use restrictions to limit development, and displacement of the local middle	ALT06-Proposed, NEW, EJSOC01-General	In the Environmental Justice section, the Agencies acknowledge that low-income environmental justice populations in the analysis area tend to be more affected by rising housing costs due to the increase in visitors and people who move to the area. However, the Agencies cannot control economy-wide impacts as those discussed in the comment. The Proposed Plan complies with Executive Order 13985.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			and lower classes from Western Communities. Conservation policies and land-use restrictions are the primary tools that the ultra-rich use to disenfranchise the remaining American public from being able to access and enjoy the public benefits of public land. In many cases public lands become the private enclaves for the enjoyment of recreation pursuits and cultural values of the ultra wealthy. In addition to a recreation alternative, the BLM/USFS should consider developing an alternative that corrects the disturbing socioeconomic trends that are taking root in the Western communities that call the areas surrounded by the Bears Ears areas home.		
18657-57	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Maintain existing decisions regarding lands with wilderness characteristics. The existing management plans carefully evaluated what lands were suitable to manage for the protection of wilderness characteristics (BLM natural areas) and those that were not. Those that were determined to be managed as BLM natural areas were without roads and already managed for non-motorized recreation. Lands determined not to be managed for wilderness characteristics had that determination for a reason, because those lands were found to have other important resources or resource uses that conflict with protection, preservation, or maintenance of the wilderness characteristics. Designating additional lands with wilderness characteristics as BLM natural areas closed to OHV use would disrupt the existing careful balance made in previous planning efforts and would have a severe negative effect on multiple forms of recreation and other valid existing rights.	ALT06-Proposed, NEW, LWC01-General	As per BLM Manual 6320, inventoried lands found to have wilderness characteristics through the land use planning process may result in several outcomes, including (1) allowing for other multiple uses in an area while not protecting wilderness characteristics; (2) minimize impacts to wilderness characteristics via management restrictions (e.g., terms and conditions of use or stipulations) while emphasizing other multiple uses; or (3) Protecting wilderness characteristics while providing for compatible multiple uses. Managing those areas specifically to meet the non-impairment standard applied to WSAs is outside of the remit of the LUP process. Thank you for the comment. See the Proposed Plan under the Land with Wilderness Characteristics section and Travel and Transportation Management section. In the Proposed Plan, lands being managed for the protection of wilderness characteristics are also OHV closed areas.
916-19	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Education A Reasonable Alternative [see letter for further detail and rationale]	ALT06-Proposed, NEW, PUBL01-Public and Stakeholder Involvement, TRAVEL01-General	The Cross Cultural Education and Outreach section in Chapter 2 provides alternatives and the Proposed Plan management actions for education.
18965-1	Simone Griffin	BlueRibbon Coalition	If any route or area specific comments are made which identify missing routes or errors in maps that lead to restricted access, we support BLM/USFS addressing these comments in the development of an alternative that maximizes motorized recreation access to the planning area. We strongly advocate against a conservation alternative.	ALT06-Proposed, NEW, REC01-General	Please see the Alternatives Considered but Not Analyzed in Detail section in Chapter 2. discussing alternatives considered but not analyzed in detail, including an alternative aimed at increasing motorized access. In the future, amendments may be made to this RMP as well as administrative changes may be made, to address mapping errors or other necessary changes to the RMP.
18657-60	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	It is absolutely essential that the new monument management plan carry over provision TM-7 from the 2020 management plans: Any lands acquired by the BLM over the life of the MMP will be managed with the same OHV area designations of adjoining BLM -administered lands or as stated or implied in the land transfer. If clarification is absent, the BLM will manage the acquired lands as OHV limited. The type of limitation will be determined by implementation-level travel planning. Until that implementation level travel planning is completed, the OHV limited use will continue in the same manner and degree consistent with the proper care and management of Monument objects and values. This provision is vital because numerous state land parcels within the monument may eventually be transferred to the BLM and Forest Service. Many existing designated routes either pass through those parcels or continue onto them after leaving federal lands. One such example is the route leading to an overlook of Arch Canyon on a SITLA parcel at 37.57080, -109.72118. It is vital that these route segments do not end up being inadvertently closed simply because the underlying land was transferred to the federal government and the segments on state land had not previously been included in a federal travel management plan. We urge the agencies to provide clarity that all existing routes on former state land parcels will remain open to motorized use until considered in implementation level travel planning.	ALT06-Proposed, NEW, TRAVEL01-General	Under the Proposed Plan acquired lands would be managed consistent with the same OHV area designations of adjoining or surrounding agency-administered lands or as stated in the land transfer decision. Please see the Travel and Transportation Management section of Chapter under the Proposed Plan column for this management action direction.
889-52	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Alternative D would close both the Moqui Canyon and the Mikes Canyon roads in the far western part of the Bears Ears Monument. Both of these are important, highly scenic motorized routes that should not be closed to prioritize wilderness characteristics. Moqui Canyon is in an isolated unit of the monument that consists almost entirely of the Mancos Mesa WSA, except for Moqui Canyon which is outside of the WSA and forms its southern boundary. The Monqui Canyon road crosses the mesa from highway 276 then descends down the side of a tall sand dune which forms a natural ramp to the canyon bottom. This sand dune is a popular attraction for offroad vehicles as it provides a significant challenge, especially going up. Upon reaching the bottom of the canyon, the road travels about 1.5 miles down the canyon and 11.8 miles up the canyon. It also accesses a short spur road that climbs up the northern wall of the canyon providing access to a hiking trailhead into the Mancos Mesa WSA. The Moqui Canyon road is extremely valuable for motorized recreation as it is one of only a handful of roads in all of Bears Ears National Monument that travels through a canyon bottom, surrounded by towering red rock cliffs above. Though lightly traveled over all, it is one of the more popular and more technically challenging OHV trails in the Monument. It has been featured on the TV show At Your Leisure which highlights some of the best OHV destinations in Utah. ³¹ Given that the entire Mancos Mesa to the north is managed as a WSA and this is the only motorized route in the Mancos unit of BENM, wilderness characteristics in the area are already well-protected, and there is no need to close this road to further emphasize wilderness management in the area. Motorized users should continue to be allowed to explore this scenic canyon, rather than taking away yet another road in a canyon bottom to give it exclusively to hikers.	ALT06-Proposed, NEW, TRAVEL01-General	Under the Proposed Plan, both the Moqui Canyon Road and Mike's Canyon Road would be within areas designated as OHV limited. the Proposed Plan, routes within off-highway vehicle area designation Map in Appendix A.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
916-3	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Develop a Reasonable Alternative to Address the Need for Motorized Access and Motorized Recreation for the Elderly, Handicapped, and Disabled [see letter for further detail and rationale]	ALT06-Proposed, NEW, TRAVEL01-General	The Purpose and Need (Chapter 1) of the Draft RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape." Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Chapter 2.The agencies manage motorized recreation in accordance with applicable law and the Rehabilitation Act. The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
19026-11	Brian Carlstrom	National Park Service	All management alternatives should consider climate change and predicted future climate, habitat protection and restoration as well as species reintroductions (under Management Actions common to All)	ALT07; CC01	The Climate Change section in Chapter 3 addresses the impacts of the alternatives on greenhouse gas emissions as they contribute to climate change. Impacts from climate change are also described within the discussion of resources analyzed in Chapter 3. The analysis of the climate change section incorporates the IPCC AR6 (2021 and 2023) report.
19026-32	Brian Carlstrom	National Park Service	2-25 Section 2.4.7.2 Vegetation All management alternatives should consider climate change and predicted future climate, habitat protection and restoration as well as species reintroductions (under Management Actions common to All)	ALT07; CC01	In the Proposed Plan, there are management actions related to drought that could be affected by climate change and drought (Recreation and Visitor Services section, Vegetation section, and Livestock Grazing section). The chapter on climate change addresses the impacts of the alternatives on greenhouse gas emissions as they contribute to climate change. Impacts from climate change are also described within the discussion of resources analyzed in Chapter 3. Climate impacts to vegetation are described in the Terrestrial Habitat and Vegetation Resilience and Conservation, Noxious Weeds and Nonnative Invasive Plants, and Forestry and Woodlands sections. Climate impacts to water are described in the Water Resources section. Climate impacts to soils are described in the Soils and Biological Crusts section. Impacts to vegetation from climate change are discussed in the Terrestrial Habitat and Vegetation Resilience and Conservation sections of Chapter 3 and Appendix N.
19026-27	Brian Carlstrom	National Park Service	G-8 1.7 1.7.4 (Visiting Cultural Sites) LNT recently partnered with AIANTA to develop guidelines for recreating responsibly on Tribal Lands. Some of these guidelines can be applied to visiting cultural sites on public lands that are sacred to Native Americans. https://lnt.org/research-resources/responsible-visitation-to-indigenous-communities-with-aianta/	ALT07; CUL01	Thank you for the comment. The agencies will take this into consideration. The interpretation plan will be developed as a part of implementation planning and will include input from various stakeholders and will be done in collaboration with the BEC. See the Cross Cultural Education Section in Chapter 2 for detail on the interpretation plan.
19032-2	Betsy Creslin		Also, since funding can be a problem for participating tribal governments, there should be funding provided for the effort to costeward this monument by the native tribes.	ALT07; CUL01	The Tribal Co-Stewardship section in Chapter 2 describes the Tribal co-stewardship process for the preparation of the RMP and for continuing collaboration for management of BENM. The cooperative agreement has been incorporated into the Proposed Plan. The co-stewardship section of the Proposed Plan does include guidance about budget planning. The Proposed Plan in the Livestock Grazing section include management actions that address grazing impacts on vegetation such as further acres made unavailable to grazing or limited to trailing only and working with the BEC to reassess stocking levels, seasons of use, and management approach. In addition, the Goals and Objectives of Livestock Grazing and Appendix G includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic functions. See the Cross-Cultural Education and Outreach provided in Chapter 2, which includes a cultural ranger program in partnership with the BEC.
19017-32	Sylvia Stubbs	San Juan County	p. 2-127 & 128 Water Developments and Range Improvements The restrictions on water developments and range improvements are extreme and troubling in reference to the Proclamations and their intent for the management of livestock grazing. Requiring new and existing water developments and range improvements to meet the criteria of "protecting BEM objects" is an almost impossible threshold to reach, is unreasonable and is inconsistent with the intent and wording in the Proclamations as pointed out above. Prohibition of new and removal of existing water developments and range improvements would severely hinder the management of livestock and severely reduce the capability of using livestock grazing as a tool for improvement of rangeland condition. Additionally, prohibiting new range improvements would conflict with County RMP policy which supports the implementation of rangeland improvement projects (Livestock and Grazing p. 76). It appears that the extremes stated for the range of alternatives as to water developments and range improvements are inconsistent with the wording and intent for livestock grazing as stated in the Proclamations. We recommend wording such as stated in Alternative B be included for all alternatives and be added in the section "Management Actions Common To All Alternatives".	ALT07; DECI07; GRAZ01	The Proposed Plan is consistent with all relevant laws and policies. In the Livestock Grazing section of Chapter 2 the Proposed Plan would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. Under the Proposed Plan, existing range improvements for livestock grazing not consistent with the protection of BENM objects would be removed, modified, or abandoned to be consistent with such protection. There are currently no water wells proposed for the Indian Creek allotment, the application was withdrawn by the permittee. In the Livestock Grazing section of Chapter 2 the Proposed Plan new water developments or modifications to existing water developments would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19040-1	John Redd mitchredd@gmail.com		From a personal business management perspective, the proposed resource management decision process will add a huge amount of risk in the day-to-day operation and long-term viability of my business operation. If drought, disease, market fluctuations, and regulatory changes haven't been enough to drive us out of this business in the past, then the impact of this approach has the potential to push us over the edge. It could drive me out of my business and off this land that my family has invested in for so long.	ALT07; EJSOC03	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values section for Environmental Consequences, under the subheaders for Economic Contributions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in Environmental Justice and Social and Economic Values section for Environmental Consequences, under the subheaders for Social Conditions under Impacts Common to All Alternatives as well as the sections for impacts under each alternative. The Environmental Justice and Social and Economic Values section of Chapter 3 discusses grazing contributions to the region's economy, and the are multiplier impacts resulting from grazing activities. The discussion of environmental consequences for grazing activities is documented in the Proposed Plan using IMPLAN analysis, which clearly depicts these multiplier impacts from indirect and induced impacts. The Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 97% of BENM lands that are currently available would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.
19041-2	Don Holyoak	SE Utah Grazing Improvement Program	All of these alternatives must take into account the negative impact they have on people's livelihoods, the economic impact. Reductions in grazing areas will hurt the permittees' business viability.	ALT07; EJSOC03	The Proposed Plan does not alter currently allocated AUMs as outlined in Chapter 2 Livestock Grazing. Any reductions that are determined to be necessary due to the reduction of acres available to grazing would be done at the implementation planning level. The impacts of the Proposed Plan to livestock grazing and permittees is disclosed in the Livestock Grazing section of Chapter 3 where it is recognized that restrictions could have an impact on permittees.
19026-34	Brian Carlstrom	National Park Service	2-29 Section 2.4.8.2 Forestry and Woodlands Climate change and climate change adaptation should be common to alternatives, such as prioritizing protection of refugia and considering future climate when designing treatments	ALT07; FOREST01	In the Proposed Plan, there are management actions related to drought that could be affected by climate change and drought (Recreation and Visitor Services Section, Vegetation Section, and Livestock Grazing Section). The chapter on climate change addresses the impacts of the alternatives on greenhouse gas emissions as they contribute to climate change. Impacts from climate change are also described within the discussion of resources analyzed in Chapter 3. Climate impacts to vegetation are described in the Terrestrial Habitat and Vegetation Resilience and Conservation, Noxious Weeds and Nonnative Invasive Plants, and Forestry and Woodlands sections. Climate impacts to water are described in the Water Resources section. Climate impacts to soils are described in the Soils and Biological Crusts section. Impacts to vegetation from climate change are discussed in the Terrestrial Habitat and Vegetation Resilience and Conservation sections of Chapter 3 and Appendix N.
19017-33	Sylvia Stubbs	San Juan County	p. 2-128 Livestock Trailing The prohibition of livestock trailing along riparian areas is unreasonable unless justified by monitoring data as the movement of livestock among different pastures of some allotments requires the use of riparian areas as the most practical routes of moving livestock in rugged canyon country where the canyons and associated riparian areas are the natural travel ways. Likewise, the prohibition of grazing along riparian areas is unreasonable as prohibition would require the fencing off of riparian areas or cowboys working full time to keep livestock out of riparian areas. And, in many instances, water in riparian areas may be the only source of livestock water for a large area. Preclusion of grazing in riparian areas and thereby precluding access to stockwater would, in effect, make livestock grazing impractical in these areas. Livestock grazing management can be designed to allow livestock access and grazing in riparian areas either seasonally and/or at designated access points. Doing so would allow livestock to be used as a tool to improve riparian condition and would be a reasonable alternative to broad scale prohibition of use. More reasonable and practical management of riparian areas would be to "limit" or "avoid" livestock trailing and grazing in riparian areas rather than to prohibit these uses entirely.	ALT07; GRAZ01	The Proposed Plan in include management actions for the protection of water resources in the Water Resources section and Livestock Grazing section. The Proposed Plan states: Avoid trailing livestock along the length of riparian areas except where existing livestock trailing corridors occur. Rehabilitate existing livestock trailing corridors where damage is occurring in riparian areas. Implement management actions if monitoring shows livestock are causing impairment to achieving properly functioning conditions (PFC) damage to riparian areas. If management actions are ineffective, prohibit trailing livestock along the length of riparian areas.
19026-13	Brian Carlstrom	National Park Service	2-125 4 Livestock Grazing Recommend adopting Alternative D for grazing utilization levels, or alternatively recommend that all alternatives should use the same baseline maximum utilization level of 30% (until monitoring data are used to identify an appropriate utilization level), as it is in Alternative D, as an overarching BMP. This will consistently manage for sustained yield/productivity and will provide better protection for vegetation and biological soil crusts, which provides more area of intact ecosystems contiguous with NPS lands.	ALT07; GRAZ01	Under the Proposed Plan livestock grazing would be managed, subject to terms and conditions, in a manner consistent with the protection of Monument objects. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS.
19026-26	Brian Carlstrom	National Park Service	G-5/6 1.5 Livestock Grazing Recommend a BMP that all fencing for livestock grazing should be wildlife-friendly and geofencing will be promoted and used wherever feasible.	ALT07; GRAZ01	The Wildlife and Fisheries- section of Chapter 2 includes direction to establish fence standards to allow wildlife movement. Geofencing is still a fairly new tool in public land livestock grazing and it is currently being used on some grazing allotments within BENM with proposals being developed for other allotments.
19026-6	Brian Carlstrom	National Park Service	96 Livestock Grazing Our policy is to enhance grazing within our county while maintaining or improving rangeland health (Section 3.2 Garfield RMP). All alternatives should read "Allocate all allotments, historic or existing, as available for livestock grazing." Alternatives B-D are inconsistent with Garfield County's RMP and should not be considered. Alternative D may be unlawful and should be removed from consideration.	ALT07; GRAZ01	Outside the scope. No part of BENM is in within Garfield County.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19026-9	Brian Carlstrom	National Park Service	2-125 to 2-132 Table 2-21. all rows Livestock Grazing Recommend adopting Alternative E with the addition of Alternative D (unavailable/not suitable areas for grazing), as it is more protective of native landscapes (healthier vegetation and biological soil crust communities) and intact ecosystems contiguous with CANY, GLCA, and NABR by proposing more areas as unavailable for livestock grazing or only available for livestock trailing near and directly adjacent to park boundaries. Also, this alternative would mitigate impacts from trespass cattle onto park lands as it creates a buffer zone in many areas around park lands where grazing would not be allowed.	ALT07; GRAZ01	Under the Proposed Plan, grazing will continue as a use within BENM, subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the proper care and management of the objects identified in Proclamation 10285. The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing. The impact of making these areas unavailable is analyzed in the Livestock Grazing section. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
19041-4	Don Holyoak	SE Utah Grazing Improvement Program	These grazing areas have a history of cattle grazing. We submit that grazing is a "historic interest" and is one of the Monument objects deserving protection according to the proclamation. This board disagrees with any decision that reduces the AUM's and grazing areas that are part of the overall history and culture of the monument's landscape. According to the proclamation, the entire landscape is to be protected.	ALT07; GRAZ01	While livestock grazing is a use noted in the Proclamation, it is not itself an object. However, the Proclamation does identify certain objects associated with grazing that are protected by the Proposed Plan. Historic sites associated with grazing are evaluated for their eligibility to the National Register of Historic places by the agencies pursuant to federal regulations found in 36 CFR 60 and 36 CFR 63. Additionally, the Proposed Plan specifically discusses management and goals to protect historic properties generally and sites associated with the historic period. See Cultural Resources section in Chapter 2. Historic properties associated with grazing are evaluated for their eligibility. See the changes in the Proposed Plan to the Livestock Grazing section about range improvements and water improvements. Language has been added to the Livestock Grazing section to continue the existence of range improvements if determined they no longer serve a purpose for the allotment or do not protect Monument objects. The agencies will follow all applicable laws, such as the NHPA, when implementing discretionary actions, such as the removal of range infrastructure.
19016-2	Linda Patterson cactuschic@gmail.com		Our family's property lies between Blanding, Utah and Bluff, Utah, and is about 2 miles from Hwy 191. We do not have electric power or internet access on this property. Cell service is only accessible on one spot on the 640-acre property. We live on this property on and off during the winter and spring months. We must drive out for cell service or down to the spot by the creek and go to our house in Blanding to connect to the internet for business. This property is located at T 39 S 22 E, in Sections 7, 17. 1 a. 19. On your interactive map this property is labeled Decker Ranch. With a major electric power line and a fiber optic line only two miles from this property, we had high expectations that someday soon we would be able to get some utility services to this property. A utility ROW to our property would cross Less than approximately one mile of Monument land. Under the proposed BENM management plan alternatives B, C, D and E, the land from our private boundary to the east boundary of the BENM Is classified as "'Right-of-Way Exclusion." Limiting what we can do with the property. devaluating the property and denying us the opportunity of ever getting any type of utility access to our property. The government will fund or help fund getting utility services to the Navajo reservation and a smell off reservation Native American community; but the government and the Native * American co-managers of the the proposed BENM management plans are destroying our chance of ever getting any type of utility services to our property. This is just wrong.	ALT07; LAND01	Under the Proposed Plan, ROWs or SUPs may be granted/authorized reasonable access to non-federal inholdings consistent with the protection of BENM objects. See the Environmental Justice and Social and Economic Values in the Environmental Consequences section in Chapter 3 for discussion of impacts to TLA parcels from OHV area designation. See the Proposed Plan under the Travel and Transportation Management section in Chapter 2.
19017-14	Sylvia Stubbs	San Juan County	Wind and solar energy developments are prohibited in Alternatives B through E. A strict interpretation of this could prohibit development of localized renewable energy developments necessary to power infrastructure needed for management of the BEM. We suggest an exception clause be added to this prescription to allow for such developments. Chapter 3 is missing a section on wind and solar energy. Inclusion of wind and solar in this chapter is needed for a more complete analysis and better understanding of the alternatives.	ALT07; LAND01	The BENM PRMP/FEIS is in compliance with the multiple use mandate on BLM and NFS lands. The Multiple-Use and Sustained-Yield Act of 1960, the National Forest Management Act of 1976, as amended, and the USDA Forest Service planning regulations (36 CFR 219), are all applicable authorities under which the BENM NEPA process was conducted. The Proposed Plan was changed to include using solar and wind developments for agency facilities. For more information pertaining to current conditions and mitigation for geology and mineral resources see Appendix N.
19035-2	Gail Johnson		I am concerned about the access (Right-of-Way) to SITLA lands, private lands, and range improvements within the monument. The language in the plan mentions "criteria that would need to be met" but never states the criteria. The language in the plan is so ambiguous and generic that it really says nothing so that a person can make an adequate comment. Right-of-ways to these areas must not be obstructed or put on hold in any way by the monument.	ALT07; LAND01	Under the Proposed Plan, ROWs or SUPs may be granted/authorized reasonable access to non-federal inholdings consistent with the protection of BENM objects. See the Environmental Justice and Social and Economic Values in the Environmental Consequences section in Chapter 3 for discussion of impacts to TLA parcels from OHV area designation. See the Proposed Plan under the Travel and Transportation Management section in Chapter 2.
19026-22	Brian Carlstrom	National Park Service	Literature Cited Under Night Skies, is there more recent dark sky data collection than in 2017? If yes, please reference here.	ALT07; NIGHT01	This is the most recent data associated with on-the-ground readings of light pollution within BENM. All action alternatives (B-E and Proposed Plan) include the development of a night skies management plan which would include inventorying dark night resources in BENM. There will be more data developed in the future.
19026-21	Brian Carlstrom	National Park Service	Literature Cited Add under Natural Soundscapes: Air Tour Management Voluntary Agreement for Glen Canyon NRA and Rainbow Bridge NM. https://www.nps.gov/glca/learn/news/20230830.htm	ALT07; NOISE01	The plan for Glen Canyon NRA and Rainbow Bridge National Monument has been added as a reference for the document.
19038-1	Joshua Wells Joshuawells109@gmail.com		Noise: if your concern is noise you could do what has been done in other BLM areas such as the Oregon Dunes Recreation area, where they prohibit aftermarket exhausts and vehicles above a reasonable noise level using the same guidelines used in the Oregon Dunes area.	ALT07; NOISE01	The agencies are committing to developing an implementation level soundscape management plan in alternatives, which will consider how to protect Bears Ears soundscapes. As described in the Visual Resource Management, Night Skies, and Soundscapes section of Chapter 2, the agencies would also collaborate with BEC to inventory and monitor soundscapes, in addition to the development of a soundscape management plan. The soundscape plan is an implementation plan to mitigate effects from BENM uses, including education about soundscapes and their importance to BENM and Tribal Nations, and will include public involvement.

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19026-12	Brian Carlstrom	National Park Service	2-81/82 Table 2-19 Recreation and Visitor Services Under alternative E - for the outback and remote zone roads it says "Designated routes would be re-evaluated through future implemenation-level travel in collaboration with the BEC." Because so many park visitors also use these roads as part of their trips, for overflow camping, or to access remote park areas, the park should be included (cooperating agency) in this future travel planning.	ALT07; REC01	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
19004-1	Steve Brownell		I feel strongly that Arch Canyon should not be closed to OHV's. I don't see that the route is over used, over visited or damaged by its current status. Closing the Canyon would only keep others like me and those whose age or physical limitations from enjoying this very special place.	ALT07; REC02	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
19035-1	Gail Johnson		1. I have noticed a tremendous increase in people, campers, hikers, sightseers, wood cutters, cyders, etc. since the designation of the monument. Traffic on the county roads is not as safe as it used to be because of this increase in traffic -most traveling too fast for a one-lane gravel or dirt road. The in-roads coming off the main roads has increased tremendously, too. The amount of trash along the roads and left at campsites has increased as well. Some places that once were pretty grassy/brush areas are now hardened dirt and at heightened risk for wind and rain erosion. For example, the little area at Soldiers Grave in White Canyon used to be all natural grass with a small road through it. Very pretty. Now, there is very little grass because of too many vehicles driving or camping on it. It is nothing more than hardpacked dirt and rock. Another example, Comb Wash. It has been hit hard by people which can be easily seen at the turnout on Highway 95. A few years ago this was a lovely riparian area. It no longer is. Cows were removed from Comb Wash to allegedly protect the riparian area. Unregulated people have done more damage to this land in the past 10 years than cattle ever did in the last 150 years. The monument has only exacerbated and accelerated this destruction. One person drives off the road; the next person comes along and sees the prior vehicle tracks and follows them but goes a little further. And so it goes. Wood cutters drive all over the place rather than drag the wood out to the road. Putting up signs telling people to stay on designated roads hasn't stopped this. I see nothing in this draft plan that is going to correct this "people" problem. Unpopular as it is, dispersed camping must be discontinued, at least in areas that are hard hit. Designated primitive camp grounds should be created for these areas. The land is just too fragile to keep up with this barrage of people.	ALT07; REC03	Under the Proposed Plan, dispersed camping could be limited in certain areas (see Appendix E) but would be allowed elsewhere in BENM. The Recreation and Visitor Services section of the Proposed Plan allows for dispersed camping in existing sites. Future designation of dispersed camping areas will be made through an implementation plan or on a case-by-case basis. The Proposed Plan does not require a reservation system for dispersed camping. The agencies are not considering such a system at this time for dispersed camping. Campsite designation and closure would considered in implementation level planning, and would be consistent with protection of Monument objects under Proclamation 10825. Under the Recreation and Visitor Services section of the Proposed Plan, agencies would inventory and monitor dispersed camping sites and areas, work to identify areas that are available to dispersed camping and areas that are limited to designated sites. Campsites would be designated to help guide and focus visitors to appropriate places and to protect BENM objects.
19013-2	Patty Lyman pattyblyman@gmail.com		I am not a hiker, I have never loved it, I'm not getting any younger and I think I deserve to ride the roads and explore. I don't know why you think you have the right to close them down. You are definitely hurting the locals when you do that, we love our backyard. We protect it, we see trash that hikers have left, and we stop and pick it up and carry it out for them. As we ride the trail's we have helped a lot of people that have run out of water, are stuck and exhausted, etc. I am going to pick one trail, Arch Canyon. If we see hikers and bikers' they usually only make it to the first ruin the sand is deep and its hard for them. We have even driven some to the end, they have come so far and want to enjoy what we are lucky enough to enjoy every day. There are Sitla lands in Arch Canyon, how can you shut private lands down? We have been riding Arch Canyon for 8 Years now, every time I go in, it seems to get prettier and prettier. It is not getting destroyed and every time I go in I see something that I didn't see before. Every season is so beautiful. I don't have grandchildren yet but I want them to be able to see the special places that I love. I want to have picnics with them and camp with them. Our Culture and traditions are important and are not being respected. Once you get to the "end" the picnic tables, the trail ends for us. The hikers still have thousands of acres to quietly explore. I tell you what, they are grateful when they get back and see a friendly face. Let us all exist together like we have been doing for many years. PLEASE DO NOT CLOSE OUR ROADS, PLEASE DO NOT CLOSE ARCH CANYON.	ALT07; TRAVEL01	The BLM manages motorized recreation act in accordance with applicable law and the Rehabilitation Act.
19024-1	Hugh Kirkham		KEEP ARCH CANYON ROAD OPEN TO MOTORIZED VEHICLES. THERE ARE MANY CANYONS OPEN TO HIKERS BUT FEW TO MOTORIZED VEHICLES.	ALT07; TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions
19026-14	Brian Carlstrom	National Park Service	vol. I,2-116 - 2-124; vol. II, A-39 Table 2-20; Figure 2-36 Alternative D, off-highway vehicle designation If selected, alternative D would prohibit access to Imperial Valley, Bull Valley, and Gypsum Canyon areas of Glen Canyon National Recreation Area. These areas are designated OHV routes by the parks current ORV plan and are accessible to all types of motorized vehicles. Alternative D would potentially affect access to Muley and Cedar Points which overlook the San Juan River and are popular destinations with the visiting public. Nearby Johns Canyon is a designated OHV route in the current ORV plan. At least partial access to the route would be precluded by alternative D. According to alternative D, Clay Cliffs Road passes through designated OHV closed areas. The online map was not working to verify that it is cherry-stemmed as a designated OHV limited route. Access should be maintained to continue to provide take-out services for SJR rafting trips. The parks section of CCR is also currently designated as OHV accessible by the current ORV plan. Following link for more on GLCA ORV plan: https://parkplanning.nps.gov/projectHome.cfm?projectID=19520	ALT07; TRAVEL01	Under the Proposed Plan, highly protected areas such as WSA's, protected LWC, and WSR, would be OHV closed. In addition, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. (Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands). All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources section for a discussion of impacts of OHV designations on paleontological resources.
19026-28	Brian Carlstrom	National Park Service	If selected, NPS notes that Alternative D would prohibit access to Imperial Valley, Bull Valley, and Gypsum Canyon areas of Glen Canyon National Recreation Area (NRA). These areas are designated OHV routes by the park's current Off-Road Vehicle (ORV) plan and are accessible to all types of	ALT07; TRAVEL01	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, to support National Park Service management of soundscapes and visual resources. However, some locations, including the routes leading to Elephant Hill, were designated as OHV limited to allow NPS

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			motorized vehicles. Alternative D would potentially affect access to an NPS overlook to the northwest of Muley Point Road, near the rim overlooking the San Juan River. There is a General Management Plan (GMP)-designated road connected at the southwest point of BLM's Monument (beyond Mike's Canyon). No route or road appears on the Monument map (unless it forms the boundary). This section is designated as "OHV closed" under Alternative D and could potentially impact the road segment inside the Glen Canyon NRA. Traveling northwest on John's Canyon Road, it is noted that all alternatives of the RMP show an OHV-limited connector continuing back into the park and traveling further up the San Juan River Canyon. The NPS notes that this down-canyon section is not a recognized route.		permitted opportunities. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, to support the NPS's ability to provide road and trail opportunities. Some routes within Beef Basin adjacent to NFS lands are within OHV closed areas to protect BENM objects.
19026-29	Brian Carlstrom	National Park Service	vol. I, 2-57 to 2-60; vol. II A-20 - A-22 Table 2-12; Figures 2-17 - 2-19 Visual Resource Management Classes Some of the BLM connectors to NPS routes fall within VRM Class I, to varying degrees. For example, portions of the Clay Hills Roadbed fall within VRM I in Alternative C, while Alternatives D and E show nearly all Clay Hills Roadbed falling within VRM I. The same scenario is duplicated with those connectors to routes in the Imperial Valley area and those servicing the Muley Point area (and the above referenced GMP road). A VRM Class I assignment will make it difficult to make road repairs to connecting transportation arteries and may also effectively render access to NPS resources and points of interest inaccessible.	ALT07; TRAVEL01	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, to support National Park Service management of soundscapes and visual resources. However, some locations, including the routes leading to Elephant Hill, were designated as OHV limited to allow NPS permitted opportunities. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, to support the NPS's ability to provide road and trail opportunities. Some routes within Beef Basin adjacent to NFS lands are within OHV closed areas to protect BENM objects.
19038-2	Joshua Wells Joshuawells109@gmail.com		Safety: recognizing that hikers and cyclists also access this area, two things could be done. Firstly, the road could be widened in a few areas. This would be something the county would need to decide on. Secondly, while drivers of off-road vehicles cannot drive drunk on this road, as it is a county road, another good idea for safety would be to ban the carrying of alcohol by any off-road vehicle on this road, again similar to the Oregon Dunes recreation area.	ALT07; TRAVEL01	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
19038-3	Joshua Wells Joshuawells109@gmail.com		However, the fact that traveling in motorized vehicles is the only way for many people not heathy enough to hike that road should not be ignored. You cannot close these long-loved attractions in Utah without having a significant impact on the ability of the disabled or elderly to explore these parts of the state.	ALT07; TRAVEL01	The agencies manage motorized recreation in accordance with applicable law and the Rehabilitation Act.
19026-10	Brian Carlstrom	National Park Service	Some of the BLM connectors to Park Service routes fall within VRM Class 1 to varying degrees. For example, parts of the Clay Cliffs Road bed fall within VRM 1 in alternative C, while alternatives D and E show nearly all of CCR falling within VRM 1. The same scenario is duplicated with those connectors to routes in the Imperial Valley area and those servicing the Muley Point area. A VRM Class 1 assignment will make it difficult to affect road repairs to connecting transportation arteries and may effectively render access to Park Service resources and points of interest inaccessible.	ALT07; VIS01	Under the Visual Resources Section in Chapter 3, under the Proposed Plan, VRM Class I was updated to contain WSA's, protected LWC, and Wild and Scenic Rivers. The VRM Class II and Class III area also updated and would allow for the sort of infrastructure the commenters points to. Site specific NEPA analysis would determine appropriateness of specific locations and actions of proposed projects.
19026-7	Brian Carlstrom	National Park Service	2-27 4 Vegetation Recommend prohibiting use of nonnative species for revegetation projects. Adopt Alternative D for determining seed mixes; alternative E gives too much latitude to make poor choices of potentially invasive species for seeding. NPS is concerned about the spread of invasive species onto parklands from BENM.	ALT07; WEED01	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
19026-35	Brian Carlstrom	National Park Service	2-45 Section 2.4.11.2 Wildlife and Fisheries All management alternatives should consider climate change and predicted future climate, habitat protection and restoration as well as species reintroductions (under Management Actions common to All)	ALT07; WILDFISH01	In the Proposed Plan, there are management actions related to drought that could be affected by climate change and drought (Recreation and Visitor Services Section, Vegetation Section, and Livestock Grazing Section). The chapter on climate change addresses the impacts of the alternatives on greenhouse gas emissions as they contribute to climate change. Impacts from climate change are also described within the discussion of resources analyzed in Chapter 3. Climate impacts to vegetation are described in the Terrestrial Habitat and Vegetation Resilience and Conservation, Noxious Weeds and Nonnative Invasive Plants, and Forestry and Woodlands sections. Climate impacts to water are described in the Water Resources section. Climate impacts to soils are described in the Soils and Biological Crusts section. Impacts to vegetation from climate change are discussed in the Terrestrial Habitat and Vegetation Resilience and Conservation sections of Chapter 3 and Appendix N.
19026-8	Brian Carlstrom	National Park Service	2-49 12 Wildlife and Fisheries Extend protections for nesting birds until at least until mid-August or August 30	ALT07; WILDFISH04	Thank you for the comment. The agencies have included appropriate guidelines concerning protections for nest birds in order to protect BENM objects. The agencies have language in the Proposed Plan to collaborate with BEC and will take other information into consideration during implementation planning and project design.
615-1	Grazing jeopardizes BENM objects		I support Alternative D because it would reduce the most harmful livestock grazing that threatens monument objects. I don't think this alternative goes far enough, but it is apparently the most that BLM managers have the guts to propose. Among other problems, livestock grazing is the main reason for the spread of cheatgrass and the devastating fires that result. These fires destroy natural and cultural resources and transform healthy habitats into sterile monocultures of alien annual grass. The attachment proves this connection between grazing and cheatgrass expansion. There is no question that continued grazing in BENM jeopardizes monument objects.	ALT07-Modification of Existing Alternatives	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. See Proposed Plan in the Goals and Objectives of the Livestock Grazing section in Chapter 2." Manage grazing to minimize or eliminate intrusion of invasive grass and plant species due to grazing-related activities" Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
889-11	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Alternative A - While this is called the no-action alternative, the designation of the Bears Ears National Monument does not permit a true no action alternative to be considered in this management process, as the agencies are legally obligated to protect the monuments objects and values. Thus some management changes will be included even in the no-action alternative, to the extent that existing management is deemed incompatible with the monuments objects and values. On the whole, alternative A is fairly reasonable and we urge the agencies to incorporate as many actions from it into other alternatives as possible. By and large, the Bears Ears area is already effectively managed, with only minor adjustments needed to handle the increased visitation that comes with national monument status. Much of the monument is managed under the twin management plans developed only four years ago for the two monument units created under the Trump administration. These management plans struck a good balance between protecting monument objects and maximizing recreational opportunities and other multiple uses that are compatible with the monument. We fully support the existing decisions regarding recreation areas and facilities, and support keeping the entire monument designated as OHV limited except for areas which are already designated as OHV closed. We strongly support keeping the monument open to drone flying except in areas where that is currently prohibited. 6 We also support limiting lands managed for protection of wilderness characteristics to those currently managed for that purpose and not expanding them. Existing decisions on lands with wilderness characteristics and BLM Natural Areas were made for a reason, and the reasons for those decisions are still applicable today. Most lands that previous management plants determined not to manage for wilderness characteristics are not roadless and are important for motorized and mechanized recreation, dispersed camping, and other recreational activities incompatible with wilderness status. Increasing the amount of lands managed for wilderness characteristics as BLM Natural Areas could only come at the expense of lost recreational opportunities and road closures, and should be avoided at all costs. On the whole, we support alternative A. However, since the no action alternative is merely a pro forma alternative included for comparison purposes and is not going to be seriously considered for adoption in this process, we urge the agencies to add an additional recreation emphasis action alternative that includes most of the actions in alternative A and additional active management techniques to promote sustainable recreation without closures, as described above.	ALTO7-Modification of Existing Alternatives	In the Proposed Plan, the zones have been re-drawn in order to ensure maintained designated routes are within the Front Country, Passage, and Outback Zones which all allow for motorized use. Though recreation is managed differently under each alternative, all alternatives retain recreational access to the Monument. No alternative being considered in the Draft RMP/EIS restricts all recreation to designated areas. Any necessary restrictions to recreation for the protection of BENM objects under implementation-level planning will be evaluated on a case-by-case basis through a public process. Thank you for the comment. Alternative A "No Action" does include the 2020 Monument Plan and direction in the Proclamation establishing the area as a National Monument and the direction to protect the objects of the Monument. This Alternative was analyzed and portions of it were included in the Proposed Plan.
12438-2	Josh Ewing PO Box 328 Bluff, UT 84512		With all of this said, I have deep concerns about the ongoing threats to this cultural landscape that have been clear for many years but that have gone largely unaddressed. While this plan calls for future implementation level plans that could start to address these issues, the plan lacks strong interim measures that could begin to address the many problems on the ground while detailed plans are being worked out. As just one example, the agencies have significant data demonstrating that certain travel routes are impacting cultural resources, but yet the plan does not call for the immediate closure or re-routing of these problematic routes. In a few cases, the Preferred Alternative appears to roll back existing protections provided for by the current Resource Management Plan (RMP), leaving a gap in protections while implementation plans are being developed. Below I detail a few of my high-level concerns.	ALTO7-Modification of Existing Alternatives	See the Travel and Transportation Management section of the Proposed Plan for management actions related to travel and transportation. The Proposed Plan designates areas as OHV-closed or OHV-limited, using the best available data for the Planning Area. See the Cultural Resources section of Chapter 3 for a discussion of impacts on cultural resources from motorized use. See the Proposed Plan and the Recreation Appendix, which outline Recreation Area Management Plans that will be developed at the implementation level and will also include management and education strategies in order to protect Monument objects, including cultural resources. OHV routes will be designated as closed or open for OHV use under travel management planning. Interpretation plans would be developed for Cedar Mesa and BENM with an emphasis on education goals for sites allocated for specific uses.
14767-208	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	All alternatives include management direction to mitigate the risks of the impacts of grazing and to emphasize sustainable, healthy rangelands. As we have discussed in detail in the earlier section by section comments on the DRMP, this statement is simply not true. Broad aspirational goals are not the management direction required under the planning regulations and directives such as planning handbook, appendix C.	ALTO7-Modification of Existing Alternatives	Thank you for your comment. See the Proposed Plan under sections for Livestock Grazing, Soil Resources, and Water Resources sections.
15071-1	Bob Tregilus		I support Alternative E of the Bears Ears National Monument Management Plan with the following caveats: * Implementation level planning—with tribal leadership and co-management—should begin as soon as a plan is finalized. * Additional protections are necessary for ancestral lands through conserving animal migration corridors and habitats to ensure that wildlife can thrive and hunting and fishing will continue for generations to come. * Derogatory names of places and objects in the Monument should be removed. * Support continued recreation by the public in the Monument, utilizing Recreation Management Zones (RMZs), which have been an effective method used in Grand Staircase Escalante National Monument and other public lands. * With tribal consultation and leadership, there should be a firewood harvesting permit system for woodcutting. * Visual resource management and protection of night skies and soundscape as outlined in Alternative E is crucial. * Paleontologists should, by permit, be able to collect and study paleo resources in order to understand them and protect objects and values in the Proclamation. * Future management priorities should be given to the preferred alternative in management of Wilderness Study Areas, Lands With Wilderness Characteristics, Areas of Critical Environmental Concern, and other similar special protections.	ALTO7-Modification of Existing Alternatives	The agencies have included timelines to prioritize the creation of implementation-level plans. See response to 9524-2 (place names), 16784-28 (paleontology), and 14265-2 (wildlife migration corridors). RMZs are used in Alternatives B, C, and D (see Recreation and Visitor Use section in Chapter 2). Private use wood harvest would continue to be allowed in areas in the Monument through an authorization system. Please seen Appendix T for a table of the implementation level plans.
1847-1	John Borstelmann 9131 Mt. Oliver St. Victor, 83455		I support Alternative E as the preferred alternative for future management, but I strongly believe that NO cattle grazing should be allowed anywhere on the national monument.	ALTO7-Modification of Existing Alternatives	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. As outlined in the Water Resources section of Chapter 2, agencies will protect and restore water resources, including riparian areas, wetlands, springs, and seeps. The Water Resources section outlines that riparian and wetland resources would be managed for PFC; manage water resources for quality and quantity. Under the Proposed Plan, utilization levels would be

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					identified on an allotment-specific basis, taking forage needs of wildlife into consideration. Chapter 2 discusses alternatives considered but not analyzed in detail, including a no grazing alternative.
1857-1	Cynthia Muhlestein		The first concerns the closure of the lands to all forms of mineral entry, location, selection, sale, leasing or other disposition. In view of the great concern over global warming and the transition to cleaner and more natural forms of energy, it seems very shortsighted to exclude this area from being used to supply possible future needs. I believe we as a country should be as self-reliant as possible in all areas, particularly energy wise. It makes no sense to outline a course of action that might eventually cause us to rely on foreign sources for valuable minerals, sources that can set prices and limit supplies at their will and to our detriment. Great progress has been made in recent years, in the mining and logging industries particularly, to leave little impact. Many areas are better off after the project than when they started. I believe the closure philosophy is not in our local or national interest.	ALT07-Modification of Existing Alternatives	Proclamation 10285 withdrew BENM from all forms of mineral entry and location, subject to valid existing rights. Revising that Proclamation is outside the scope of this document.
7281-1	Debbie Bulger		I support an improved Alternative E. The improvements I would like to see are Closure of Arch Canyon to motorized vehicle use. Exclusion of livestock for grazing especially around surface water and springs. Use of native seeds for restoration activities. Prohibition of mechanical tree felling and timber harvesting. Thank you for including Protection of cultural sites No target shooting. It is dangerous to allow target shooting among non shooting hikers.	ALT07-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon.
864-5	Concerned conservationist		On this specific proposed action, I support Alternative D because it would do the most to protect monument objects and to help respond to the climate and extinction crises. However, I wish that Alternative D would do more to limit harmful livestock grazing and associated private ranching activities on this public monument	ALT07-Modification of Existing Alternatives	Proclamation 10285 states that the agencies "shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations consistent with the care and management of the objects identified above and in Proclamation 9558." Alternatives in the DEIS considered multiple ways to manage grazing under existing permits. In the Proposed Plan, grazing management is designed to protect resources, including objects of the Monument. Several management actions analyzed in Alternative D are carried over to the Proposed Plan, for example the prohibition on new water developments for livestock.
9189-1	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Our review of the Draft RMP/EIS (RMP) raises major concerns. The deficiencies in the RMP are too numerous to detail and it needs to be revised to address the protection and restoration of the ecosystem and objects yet undefined. It must assess and report the current state of these upland and riparian habitats and associated wildlife populations compared to their potential and address the causes of environmental degradation. It must provide quantitative and systematic monitoring and management to guide decisions. It must rely on the best available science for decision making going forward. The intent of our laws and regulations must be enforced regardless of political forces or special interests.	ALT07-Modification of Existing Alternatives	Information regarding the impacts to upland and riparian habitats and associated wildlife populations is described in Appendix N in the Wildlife and Fisheries. Further information can be found in Appendix N, in the Terrestrial Habitat and Vegetation Resilience and Conservation, Water Resources, and Forestry and Woodlands sections.
9255-17	Keith Alleman		page 3-89. Says "Under Alternative E, Monument acreage designated as OHV limited or OHV closed use is the same as Alternative D." That is a misleading statement. Alternatives D and E are significantly different in their acreage designations for acres that are OHV limited and acres that are OHV closed.	ALT07-Modification of Existing Alternatives	This language was modified to accurately reflect OHV limited and OHV closed acreages under Alternative E.
9255-19	Keith Alleman		page ES-11, paragraph ES-5.1.2 I'd prefer Alternative D's restrictions on discretionary activities based on slope, with the sort of collaborative, Tribal Indigenous approach in Alternative E applied in those areas that pass the slope criterion.	ALT07-Modification of Existing Alternatives	The Proposed Plan in the Soil Resources section says that no surface-disturbing discretionary actions would be allowed on slopes greater than 30 percent unless necessary to protect BENM objects. If surface-disturbing discretionary actions cannot be avoided on slopes between 21 percent and 30 percent, an erosion control plan would be required, as applicable. Additionally, the Overarching Management section of the Proposed Plan states that agencies would collaborate with the BEC on the site-specific implementation-level management.
9279-4	A friend to our public lands		I care about Bears Ears National Monument. I want BLM and the Forest Service to approve a plan that will effectively protect it. I think a combination of Alternatives D and E is needed to provide that protection.	ALT07-Modification of Existing Alternatives	Thank you for your comment. See the Proposed Plan for proposed management actions. Alternatives D and E were considered for inclusion in the Proposed RMP.
9372-1	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	As an owner of Sunrise Outfitting, Inc., we provide top-notch guide services for hunting trips and responsible and educational scenic adventures across this culturally significant landscape. With over 30 years of experience, Sunrise Outfitting has earned a stellar reputation, but our longevity could be significantly influenced by the decisions made in this planning process. Additionally, I am the owner of Frozen Fox Ice, the sole locally-owned bagged ice production and distribution company in San Juan County. Our customer base largely depends on the recreational use of public lands in the area, and this process could have a significant impact on our business.	ALT07-Modification of Existing Alternatives	For more information about socioeconomic impacts of the planning process, please see the Environmental Justice and Social and Economic Values section of the Draft RMP/EIS.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
9372-14	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Page 37 introduces the idea that Alternative E would prioritize a wholistic land management approach that provides equity to the Traditional Indigenous Knowledge of the Bears Ears landscape. The alternative would take a more active approach to maintaining, restoring, and/or improving critical habitat requirements for native fish and general habitat for terrestrial wildlife. These actions would likely improve wildlife habitat, relative to Alternative A. This lacks an acceptable explanation of the plans and goals of the draft plan. Under the same alternative, mechanical land-clearing techniques will be prohibited, so it is unclear how this approach will address the 3rd purpose of the proclamation. It also fails to acknowledge the State of Utahs Division of Natural Resources who are the stewards of the controlled wildlife species within State boundaries.	ALT07-Modification of Existing Alternatives	The goals and management actions for each resource analyzed are outlined in greater detail, in the Detailed Description of the Alternatives section, of the Proposed Plan. The Wildlife and Fisheries section of the Proposed Plan provides more detail on management actions and goals for wildlife and fish. The Vegetation section of the Proposed Plan covers mechanical treatments. The Proposed Plan mentions collaboration with UDWR where applicable.
9372-5	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	There is no discussion of punishments in this plan. All these changes in rules and regulations provide no information about how they will be enforced. There is no information about who will enforce the regulations. Furthermore, there is no information about how strictly those who violate the regulations will be punished. As such, we are at a loss in being able to consider the validity that any of these regulations will stand up to the test of time and do anything they are purposed to do. It is important that we get this information and we can comment on the full plan before a plan is set into action.	ALT07-Modification of Existing Alternatives	The RMP/EIS informs how the Monument will be managed. Enforcement of that management is beyond the scope of this EIS. The agencies will collaborate with local, state, and Tribal law enforcement on law enforcement strategies of BENM.
11-3	Eric Johnson Amphibian Refuge, 11225 Morocco Road NE Albuquerque, NM 87111	Amphibian Refuge	Areas of Critical Environmental Concern (ACEC) should be established specifically for amphibian protection.	ALT07-Modification of Existing Alternatives, ACEC01-General	In accordance with 43 CFR 1610.7-2 (c)(3), ACEC nominations are sought early in the land use planning process, specifically during the public scoping process. Appendix N, Areas of Critical Environmental Concern and Research Natural Areas section discusses the publicly nominated ACECs proposed during the BENM scoping process.
16236-3	Michael Painter Californians for Western Wilderness, P.O. Box 210474 San Francisco, CA 94121	Californians for Western Wilderness	We also strongly support the inclusion of the Shay Canyon and San Juan River Areas of Environmental Concern, which are left out of Alternatives B, C, and D. While we support the blanket prohibition on entering rooms in cultural sites, we would like to see a policy that puts signs on the approaches to sites, rather than directly in sites themselves, which distract from the overall feelings of sacredness of sites (in addition to interfering with photography).	ALT07-Modification of Existing Alternatives, ACEC03-Nominated ACECs	Please see the Proposed Plan under the Cross-Cultural Education and Outreach section and Recreation and Visitor use section for details on signage objectives for Zones and Management Areas. See the Proposed Plan in the Special Designations section for ACEC designations.
18082-15	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS on pp. 2-66 to 2-69 includes the goals and objectives, and management actions under each of the alternatives. We recommend the goals and objectives, and management actions all correlate, build upon one another, and include meaningful metrics and timeframes. Due to the potential for BLM-authorized emissions generating activities to affect air quality and Air Quality-Related Values (AQRVs), it is of great importance that the RMP present a framework of metrics within the goals and objectives since metrics provide benchmarks for determining whether objectives and goals are being or will be achieved. Additionally, the RMP does not include numeric metrics for air quality and AQRVs. Since numeric metrics provide benchmarks for achieving goals and objectives, we recommend establishing numeric metrics in the RMP. Finally, we recommend including Greenhouse Gas (GHG) goals and objectives, and management actions in the RMP.	ALT07-Modification of Existing Alternatives, AIR01-General	Air Quality section includes a discussion of the environmental consequences of the alternatives, including direct and indirect effects, as required by 40 CFR 1502.16. Metrics for air quality are tied to the assumptions used for emissions calculations, such as AUMs, miles of open travel routes, number of vegetation management projects, etc. The BLM has prepared a baseline emissions inventory for BLM authorized activities and described where the emissions are the same or different under each alternative, using metrics from sources emissions would come from. If air quality standards are not met the BLM would work with the state and EPA to adjust management activities in the Monument as necessary.
18082-19	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend a management action that states, Manage all actions and programs to (1) minimize the creation and transportation of dust; (2) ensure fugitive dust does not create safety, health, or nuisance conditions; and (3) ensure fugitive dust does not impact attainment of the NAAQS or goals for AQRVs.	ALT07-Modification of Existing Alternatives, AIR01-General	The Proposed Plan includes dust abatement as are minimization of fugitive dust and NAAQs, in accordance Utah State Administrative Code for Emission Standards: Fugitive Emissions and Fugitive Dust. See the Alternatives for Air Quality table in Chapter 2. Under all alternatives, agencies would manage emissions to protect air quality and air quality related values and ensure compliance with state and federal air quality standards. See Impacts Common to All Alternatives in Air Quality Chapter 2.
18082-21	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend a management action that states, Ensure that prescribed burns conform with the Utah Smoke Management Plan and the National Wildfire Coordinating Group Standards for Prescribed Fire Planning and Implementation (May 2022); are timed to occur during meteorological conditions that maximize smoke dispersal; and undergo site-specific NEPA.	ALT07-Modification of Existing Alternatives, AIR01-General	The agencies considered the proposed changes in the Air Quality section. The Proposed Plan includes conforming with the Utah Smoke Management Plan. In addition to the provided management, agencies are already required to follow the most up to date laws, regulations, and policies, which would include conforming to the National Wildfire Coordinating Group Standards for Prescribed Fire Planning and Implementation (May 2022).
1718-1	Please protect BENM		Please support and strengthen Alternative E. There should be greater restrictions on OHV use and cattle grazing.	ALT07-Modification of Existing Alternatives, ALT05-Alternative E	Thank you for your comment.
1847-2	John Borstelmann 9131 Mt. Oliver St. Victor, 83455		I support Alternative E as the preferred alternative for future management, but I strongly believe that NO cattle grazing should be allowed anywhere on the national monument. I am quite familiar with much of the Bears Ears from decades of camping, climbing, hiking, wandering with family and friends. It is all highly vulnerable, delicate desert country suffering from overgrazing and increasing heat and drought from climate change. Cryptobiotic crusts have been decimated everywhere that cattle have been allowed to graze. They take decades or more to heal, if they ever recover. There just is not much grass or anything edible for wildlife, much less cattle to eat!! Overgrazing by cattle has trashed most of the public lands in the West; it has to stop for the sake of the land, the health of the ecosystems, all of it challenged by accelerating climate change.	ALT07-Modification of Existing Alternatives, ALT05-Alternative E, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Livestock Grazing section and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
3123-3	Russell Bodnar 5A Road 2976 Aztec, 87410; Tracy Bodnar		Remove these intrusive log rail fences from Double Stack Ruin in Butler Wash. This type of barricade is fine for parking lots and trail heads, but has no place in a backcountry archaeological site. It is a major intrusion to the atmosphere of the ancient sites. Replace with a simple t-post and barb wire fence just beyond the midden or down canyon at a pinch-point. Do not use this type of barricade at	ALT07-Modification of Existing Alternatives, ARC01-General	Fences at archaeological sites and educational signage will be addressed during implementation-level planning. The Proposed Plan in the Cultural Resources section says that a Cultural Resource Management Plan (CRMP)/Historic Property Plan (HPP) would be developed within two years of the completion of this RMP/EIS in coordination with the BEC and Tribal Nations. One item that the CRMP

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			other backcountry ruins. Install Cultural Resource etiquette signs at trail heads so inexperienced hikers understand the fragile nature of cultural sites and natural features like soil crusts and avoid harming them.		would include is a monitoring and stabilization plan for cultural resource sites, including protective measures like fences. The CRMP would also include the interpretation plan, with education goals identified in collaboration with the BEC.
18677-2	Benjamin Bellorado Tucson, AZ		While I am strongly in favor and supportive of the direct integration of efforts to understand and link both traditional indigenous knowledge and western scientific knowledge in Alternative E, I suggest that greater efforts should be made to bring western scientists, particularly archaeologists familiar with the BENM area to the table to join efforts to preserve, protect, and especially interpret the archaeology of the area. Having read large portions of the Draft Resource Management Plan and Environmental Impact Statement Volume 1, particularly section 2.4.14.2., I found the proposed efforts common to all alternatives to be very ambiguous and lite as far as how western scientific knowledge, especially how knowledge produced by archaeologists, will be integrated into the management plan.	ALT07-Modification of Existing Alternatives, ARC01-General	Thank you for your comment. The management actions in the Proposed Plan provide high-level guidance or direction. The agencies have committed to. Implementation level plans that will provide further direction and guidance. See the Cultural Resource Management Plan in the Cultural Resources section. This plan and the Tribal Co-stewardship implementation plan will provide further direction on the incorporation of Traditional Indigenous Knowledge and Western Science.
14767-44	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	All of the alternatives that the BLM has any intention of selecting completely fail to deal with drought management or provide any science-based management requirements to deal with drought. We have provided various drought research papers, management guidelines and drought policies from other agencies for your review. We recommend a drought policy similar to the Tonto National Forests which we have provided copies of. This policy should be tailored to fit the differing climate patterns which would mean adjusting the SPI from -0.70 to something more applicable to Utah such as -0.85. The RMP must specify that the drought policy will come into effect in the ROD and that permit terms and conditions will be updated to reflect the drought policy.	ALT07-Modification of Existing Alternatives, CC01-General	Management actions common to all alternatives in the Recreation and Visitor Services, Livestock Grazing section, as well as specifically under the Proposed Plan for grazing, soil, and vegetation include direction relating to management of resources during periods of drought. The agencies may consider the Tonto National Forest policy as the implementation level drought management plan is developed.
10857-4	Shawn Ivins		There are many sections throughout the Draft Plan that mentions the sacredness of the land to indigenous people in the area but fails to acknowledge or even mention how the area is sacred to the non-indigenous people in the area. That being said there are many times throughout the proposed plan, especially in Alternative E, that one group of people is given more importance and influence than other groups of people.	ALT07-Modification of Existing Alternatives, CUL01-General	Non-Indigenous historical connections to the BENM area are presented in detail in the Historic Communities, Historic Resources section. See Management Actions Common To All Action Alternatives in the Cultural Resources section of Chapter 2 that notes the importance of non-Indigenous cultural resources within BENM.
12507-1	Daniel Sandweiss 1990 K Street NW, Suite 401 Washington, 20006	Society for American Archaeology	Stopping the looting and other forms of intentional destruction: while unintentional destruction of the monuments cultural objects is of primary concern, looting and vandalism have damaged archaeological sites and artifacts, particularly tribal objects of cultural patrimony and spiritual importance to the Indigenous community on the monuments cultural landscape. The damage done by these activities to both the archaeological record and Native American heritage cannot be overstated. To prevent vandalism and unintentional damage to archaeological sites, educating the public on federal penalties and respectful visitation is a good step, but it may not be enough to prevent looting. To address this issue, we recommend the RMP take the following measures: (1) conduct a comprehensive inventory of the cultural objects found in the monument; 2) expand the volunteer site stewardship program to monitor and document any changes to the inventoried objects through site visits, including natural, unintentional, and intentional changes; (3) use drone surveillance as needed and permitted; and (4) ensure there is sufficient law enforcement to deter and prevent looting.	ALT07-Modification of Existing Alternatives, CUL01-General	Ongoing archaeological inventory would occur under the Proposed Plan. Priorities for inventory would be established in the CRMP that would be required under the Proposed Plan. The comprehensive CRMP would also present additional plans for protection and preservation of cultural resources within the Monument. The Cross-Cultural Education and Outreach section has management in the Proposed Plan to provide interpretation and education to educate the public on Visiting with Respect and limiting inadvertent impacts to cultural resources. The plan incorporates existing and enhanced programs for site stewardships, site ambassadors and tribal rangers.
12507-3	Daniel Sandweiss 1990 K Street NW, Suite 401 Washington, 20006	Society for American Archaeology	Implementing a landscape-scale approach to preservation: once the Section 110 inventory is finished, the RMP must manage the identified cultural resources on a landscape basis. Programmatic, landscape-scale management of the BENMs archaeological resources is the only way to effectively preserve and interpret the history and cultures of the peoples who called that area home in their proper contexts and to do so in a timely and cost-efficient manner. Typically, monument objects are not isolated sites, features, or artifacts but are part of an interconnected network of natural and built entities that collectively express how humans occupied and used the landscape. An archaeological site doesnt end at a dwelling or community wall. It extends into the surrounding landscape with ceremonial, agricultural, quarry, production sites, foraging and hunting grounds, paths and roads, and much more. The Alternative E zonal and tribal land management approach effectively implements this holistic land management strategy. However, the proclamation declares the entire monument landscape as an object that defines the monuments boundaries, but we did not find anything in the draft plan that indicated how you plan to extend holistic land management to maintain the integrity of the monument landscape object. Tribal land management practices will likely do this naturally, but from an archaeological record preservation standpoint, we recommend you identify and protect cultural landscapes across the monument.	ALT07-Modification of Existing Alternatives, CUL01-General	Ongoing archaeological inventory would occur under the Proposed Plan. Priorities for inventory would be established in the CRMP. The CRMP would also present detailed management approaches to protect and/or preserve cultural resources within the Monument at a landscape level in collaboration with the BEC and other Tribal Nations.
14767-156	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 2.4.14.2: Cultural resources that are eligible for the National Register, including archaeological sites, historic sites, cultural landscapes, districts, and TCPs that are managed according to NHPA regulations, would continue to be maintained and managed to preserve their National Register characteristics and integrity of location, design, setting, materials, workmanship, feeling, or association. The NHPA is not a protective statute, its merely an analysis statute. Nothing within this section demands Class III surveys and full protection prior to degradation. All impacts to cultural resources are, by definition, both cumulative and permanent. Yet the BLM will continue the primary impact to cultural resources, livestock grazing, with no Class III surveys, no protective measures.	ALT07-Modification of Existing Alternatives, CUL01-General	Ongoing archaeological inventory would occur under the Proposed Plan. Priorities for inventory would be established in the CRMP that would be required under the Proposed Plan. The Proposed Plan requires implementation level allotment management plans, review of allotment renewals which will require cultural resource inventory to analyze impacts to cultural resources from livestock grazing at implementation. See the Cultural Resources and Livestock Grazing section in Chapter 2 for analysis of impacts from livestock grazing on cultural resources. Section 106 (now 54 USC 306108) of the NHPA is a procedural requirement under the statute. The NHPA, however has multiple provisions, some of which do mandate the agencies to preserve historic properties.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-157	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section 2.4.14.3 is classic BLM shell game. So under the 2020 ROD, the BLM was required to develop a CRMP within 2 years. Four years later and they have not even started. So what does the BLM do? Regurgitate the same promise but remove the deadline from all but Alt E. Even if the CRMP is ever written, the BLM has restricted it to only significant cultural resources, not all cultural resources. How does the BLM define significant? That is totally unknown.	ALT07-Modification of Existing Alternatives, CUL01-General	Please see changes under the Proposed Plan. Under the Proposed Plan for the Cultural Resources Management Plan, it will be developed in collaboration with the BEC and Tribal Nations.
18708-2	Heidi Blankenship Blanding, UT 84511		Closure of the Moon House corridor to visitors only occurs in a few alternatives, but I strongly support the closure in every alternative. I also support the closure of Perfect Kiva in Bullet Canyon as well as every archaeological site in BENM. Allowing entry to Moon House and Perfect Kiva contributes to the idea that every site on the mesa can be entered "if you're careful." Visitation of this nature contradicts the Visit with Respect ideals that the BLM promotes	ALT07-Modification of Existing Alternatives, CUL01-General	See the Proposed Plan under the Cultural Resources in the Management Actions by Alternative table. The Proposed Plan limits entry to cultural resources over Alternative A.
3123-2	Russell Bodnar 5A Road 2976 Aztec, 87410; Tracy Bodnar		Comb Ridge canyons (off Butler Wash) are being overused and cliff dwellings and rock art sites are being harmed. Social trails and cattle trails are causing serious erosion. Management must regulate the amount of people and cattle so that fragile cultural sites are not adversely impacted.	ALT07-Modification of Existing Alternatives, CUL01-General	See the Proposed Plan under the Cultural Resources section restrictions on recreation regarding the protection of rock art cliff dwellings to protect Monument objects. The Proposed Plan also stipulates land health assessments of livestock grazing allotments, including Comb Wash, to inform grazing use practices under Alternatives B, C, and D (the Management Actions by Alternative table in the Livestock Grazing section of the Draft RMP/EIS). Additionally, under all alternatives analyzed in the RMP/EIS, the BLM and USDA Forest Service can apply restrictions Monument uses if ongoing impacts to resources are observed and restrictions are necessary to provide for the proper care and management of Monument objects and values.
35-3	Nathan Ong		I also believe that it would be beneficial for both parties to establish formal channels between scientists and tribal leaders to learn from and incorporate tribal knowledge into western scientific study, as currently it can be difficult to ascertain who a scientist should contact if they want to gain a native perspective on their work and its findings.	ALT07-Modification of Existing Alternatives, CUL01-General	The Inventorying, Monitoring, Science, and Indigenous Knowledge section in Chapter 2 touches on the collaboration and incorporation of traditional indigenous knowledge into implementing management in BENM. Additionally see the Tribal Co-Stewardship section for collaboration between the Agencies and the BEC on research.
8677-11	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pgs 3-292 3-293, section 3.5.2.1, paragraph 3: Change wording to read This section summarizes the pre-contact history of the region, that is, the time before European and Euro-American exploration and settlement. The lifeways of Indigenous people (as informed by archaeological and ethnographic research) in the area are also summarized at the time of Euro-American contact.	ALT07-Modification of Existing Alternatives, CUL01-General	Comment noted. See Appendix N which incorporates text suggestions.
8677-12	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pgs 3-293 3-307, section 3.5.2.1.1: Several recent publications are not cited in this section, indicating an incomplete, if not lax, review, understanding, and use of the available scientific information. For example, Tune (2020) should be cited in the Paleoindian Period section because it reviews the archaeological evidence for Paleoindian projectile points in the Bears Ears region. Aside from Martin (1973), there are more recent and relevant discussions on Pleistocene megafauna published in the scientific literature (e.g., Grayson and Meltzer 2015, Wolfe and Broughton 2020). The discussion of environmental changes and pinyon pine migration on the Colorado Plateau could be bolstered by citing Coats et al. (2008), Cole et al. (2013), and Louderback et al. (2020) and references within. Likewise, for the discussion of human diets in the Early and Middle Archaic, Yoder et al (2019), Louderback and Pavlik (2017), and Louderback (2022) should be cited. In the Late and Terminal Archaic section, another recent publication on the emergence of farming on the Colorado Plateau is Codding et al (2021).	ALT07-Modification of Existing Alternatives, CUL01-General	Suggested sources were reviewed and included where applicable.
12507-2	Daniel Sandweiss 1990 K Street NW, Suite 401 Washington, 20006	Society for American Archaeology	Conducting a comprehensive inventory of cultural resources: the monument needs a complete inventory of cultural resources within the BENM, as per Section 110 of the National Historic Preservation Act. Without such an inventory, the BLM and the American public will not wholly understand the BENM, its past inhabitants, and their relationship to the land and their descendants. According to archaeologists who have worked extensively in the area, approximately 9,000 recorded archaeological sites lie within the restored monument boundaries. Since only about 10% of the land in the BENM has been professionally surveyed and inventoried to date, the total number of sites is likely much greater. Experts estimate that at least 100,000 sites are present within the BENM, closely associated with Native American tribes of the Southwest (Hopi, Navajo, Uintah and Ouray Ute, Ute Mountain Ute, and Zuni, among others) whose ancestors presence in the area dates back at least 12,000 years. Without a comprehensive inventory, the monument wont be able to effectively assess the threat of allowed discretionary use decisions to the monuments protected objects. The agencies must make completing a cultural object inventory using tribal knowledge, predictive models, and archaeological surveys an Assessment, Inventory, and Monitoring (AIM) priority. Funding is always an issue, especially when budgets are shrinking. So, we suggest you seek collaborative projects with external grant funding projects with external grant funding that include holders of Indigenous knowledge, professional archaeologists, and trained tribal and nontribal volunteers. Predictive models, permitted drone mapping, and digital recording can accelerate and reduce the cost of survey and inventory operations. We look forward to reviewing the details of your approach in your science plan.	ALT07-Modification of Existing Alternatives, CUL01-General, DEC107-Compliance with other laws and policies	Ongoing archaeological inventory would occur under the Proposed Plan. Priorities for inventory would be established in the CRMP. The Proposed Plan highlights collaboration with the BEC to inventory and prioritize cultural resource inventory across BENM. The Proposed Plan also incorporates analysis of a predictive model completed for a Class I inventory, which was completed for the BENM region recently.
15439-19	Jason Keith Moab, UT 84532	Access Fund	General Prohibitions Under Alternative E activities inconsistent with the protection of Monument objects and the Bears Ears cultural landscape, as determined in collaboration with the BEC and in accordance with Tribal expertise and Traditional Indigenous Knowledge are prohibited in BENM. Newly prohibited activities include, but are not limited to, paragliding, hang gliding, base jumping,	ALT07-Modification of Existing Alternatives, CUL01-General, REC01-General	Very few visitors to the BENM region participate in most of these activities except for stacking rocks, otherwise known as cairning. Although creating cairns is a common activity on the landscape it can create a safety issue due to visitors getting lost. The agencies have documented impacts to cultural resources from rock stacking across the landscape.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			wing-suit flying, geocaching, and rock stacking. According to the draft RMP, these are inappropriate activities in the Bears Ears cultural landscape according to Tribal expertise and Traditional Indigenous Knowledge. It would be helpful for the Agencies to provide more of an explanation why and how these prohibited activities are inappropriate activities in the Bears Ears cultural landscape, which will result in more compliance and understanding by the public.		
18990-10	Clif Koontz		Input from the BEITC and wilderness-expansion groups seems to have made the DRMP/EIS regard recreation as a nuisance rather than a necessity for humans to thrive and foster a sense of genuine stewardship. The draft refers to "traditional, cultural, and spiritual uses" as if they're separate from recreation, yet activities like camping and travelling through the landscape are often how these concepts like a spiritual pursuit are actually practiced, thus recreation is instrumental. While the DRMP/EIS action alternatives apply the most excessive restrictions to motorized recreation, the Organizations note that some excessive restriction applies to non-motorized recreation, such as the preferred alternative's prohibition on hiking off of designated trails in the Remote RMZ that covers over three-quarters of the planning area. While limiting hiking to designated routes may be appropriate in settings such as an archaeological site, doing so across more than one-million acres is just one way in which the DRMP/EIS (and especially the preferred alternative) would actually work against the values associated with traditional, cultural, and spiritual uses.	ALT07-Modification of Existing Alternatives, CUL01-General, REC01-General	See the Proposed Plan under the Recreation and Visitor Services section in Chapter 2. There is no prohibition on off-trail hiking in the Proposed Plan. Additionally, there is no prohibition on off-trail hiking under any alternative in the Draft Resource Management Plan. The language under Alternative E reads, "the public would be encouraged to stay on trails when hiking in the Monument."
1660-4	Robin Benallie 387 N 300 W Blanding, UT 84511		3. Let us work together with the local community, schools, and groups to take the pressure off the BLM and Forest Service to protect our land together. A) The people (white and native) in this area know and love this land and do not want to have restrictions on land they grew up on taken away. 1) Native people still want to be able to hunt, fish and gather wood, berries and herbs 2) Local access to cattle, land, access areas used by their ancestors to see the Fall colors and the beauty that have always enjoyed	ALT07-Modification of Existing Alternatives, CUL02-Traditional, Religious, or Cultural Use	The agencies will work with local communities as well as the MAC, Tribal Nations, local communities, and local governments to develop an Interpretation Plan. The agencies also work with various partners and include the SHPO to educate visitors and monitor cultural sites to ensure they are not being damaged by visitation. See the Cross Cultural Education and Outreach section within the Proposed Plan for additional management regarding education and outreach. The Proposed Plan allows for continued hunting and collection of traditional plants and resources under applicable law. Grazing will generally continue under the Proposed Plan.
8992-8	Olivia Juarez 1919 14th St, Suite 700 Boulder, CO 80302	GreenLatinos	We support Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management. We support the prohibition of commercial seed gathering and plant collection and provision for the continued collection of seeds and plants where necessary for Tribal Nations traditional, medicinal, and ceremonial purposes. Alternative E should be modified to: prohibit mechanical treatments and commercial timber harvest; ensure compliance with the forthcoming national forest plan amendment to conserve and restore old and mature growth forests; require the use of native seeds and seedlings for revegetation and reclamation; and include the use of Pion Pine or Pion Nut for instances where pinyon pine or pinyon nut occur in educational or interpretive materials about vegetation. This latter suggestion is an opportunity for more relevant and culturally competent language use meaningful to Hispanic/ Latino visitors to the monument. We encourage a vegetation management plan that includes ongoing partnership with universities and community-based organizations that explore and augment traditional foods and medicines sited in the monument area and manage their cultivation in the monument, such as the four-corner potato cultivation program led by Utah Din Bikyah and the University of Utah. We believe that people have always played an active role in promoting the growth and health of traditional foods and medicines, and that where desired, Tribal Nations and partners should be able to continue to actively steward plant foods and medicines for people, and for wildlife through natural or non-invasive methods.	ALT07-Modification of Existing Alternatives, CUL02-Traditional, Religious, or Cultural Use	The use of mechanical treatments and commercial timber harvest would be implemented in accordance with resource management objectives listed in the Proposed Plan, and would be implemented based on other resource management requirements and in collaboration with the BEC and consistent with the protection of Monument objects (Management Actions Common to All Resources and All Alternatives, including but not limited to LWC, VRM class, cultural resources, presence of T&E or designated species, presence of old-growth, or specified woodland/forestry resources. The use of mechanical treatments is an important tool to be able to provide for protection of BENM objects, and to reduce impacts to various resources (cultural, vegetation, aquatics, fire and fuels, woodlands and forestry, non-native vegetation etc.) from various types of disturbance, including but not limited to insect and disease outbreaks, drought related tree mortality, wildland fire, flooding, wind events, habitat loss due to fire exclusion and/or transition in vegetation type. Mechanical vegetation treatments are also typically accompanied by seeding of native plant species and have a higher germination rate when applied prior to treatment and get covered by remaining vegetation (wood chips/mulch from mastication), which also assists in soil stabilization, water retention, noxious weed suppression, and native seed germination. Mechanical treatment can be implemented without significant impacts to other resources, with implementation of design features specific to any/all resources present in the project area. Removing the option for the use of mechanical treatment would limit resource management and ecological restoration activities (Table 2-6. Alternatives for Vegetation), specifically in locations where previous land management has dramatically altered ecological function, species composition, and watershed health, and implementation of hand treatments would not achieve resource management objectives (Fire and Fuels, Forestry and Woodlands, Cultural Resources). Much of BENM does not have merchantable timber and would not be suitable for a traditional timber harvest where a timber harvest unit would be bid on and the federal agency administering the timber sale would receive financial compensation. However, in a non-traditional sense the implementation of timber harvesting could include methodologies, such as thinning from below, hazard tree removal, harvesting of dead/dying trees for fuelwood, and other applications that may benefit resource objectives from an ecological, habitat quality, wildfire risk reduction, and sustainable use of natural resources (fuelwood and biomass utilization). As specified in the BENM Proposed Plan, vegetation management would include use of the best available science and associated opportunities for collaboration with academic institutions, scientists, and collaboration with the BEC.
8976-4	Steven Concho P.O. Box 309 Acoma, NM 87034; Randall Vicente P.O. Box 309 Acoma, NM 87034; Aaron Sims 317 Commercial St. NE, SUITE 102 Albuquerque, NM 87102	Pueblo of Acoma; Pueblo of Acoma; Pueblo of Acoma	In addition, the RMP must emphasize the need for cultural sensitivity training for all personnel, whether employees or volunteers, involved in the management of BENM. Such training is imperative and should be developed in consultation with Tribes and should be a requirement for anyone working on or managing these lands. This training must also emphasize the importance of the BENM as an interconnected cultural landscape important to many Pueblos and Tribes, not just those that have been part of the Bears Ears Intertribal Commission. This will foster greater respect and understanding of the cultural significances embedded in every aspect of BENM. Additionally, management actions should prioritize cultural resource protection over recreational and other uses that could potentially harm the landscape's integrity. This stance was clearly articulated in Acoma's previous protests and comments, where we highlighted the inadequacies in past management plans that insufficiently protected cultural resources against the impacts of recreation and grazing.	ALT07-Modification of Existing Alternatives, CUL03-Tribal Concerns	Under the Proposed Plan, in the Cross-Cultural Education and Outreach section agencies would collaborate with the BEC and Tribal Nations to develop interpretive messages and educational materials that tell the history of BENM from the Tribal Nations perspective and their relationship to these sacred lands. The Proposed Plan, in the same section, also has management actions for working with Tribal Nations (not just the BEC) to develop cultural sensitivity trainings. The Proposed Plan under the Recreation and Visitor Use section and the Cultural Resources section, also includes management actions to protect cultural resources from recreation visitation. These include not allowing climbing equipment to access cultural resources, prohibition of target shooting in BENM, encouraging hiking on designated or existing trails, not allowing visitors into the interior rooms of structural cultural sites etc.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15381-7	Sagebrush Habitat Conservation Fund		3.2. Availability of Data and Incomplete Information You claim the best available information was used in the preparation of this RMP/EIS. If this statement is true, the information is not adequately disclosed in this document. We will address this further under specific sections for the Affected Environment and Impacts.	ALT07-Modification of Existing Alternatives, DATA01-Analysis Methods and Data	The information presented in the RMP/EIS is the best available information in the Planning Area and is sufficient to inform the decisions to be made in the RMP/EIS. Citations regarding data sources occur throughout the RMP/EIS and full literature cited is found in the Literature Cited.
17969-2	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Canyonlands Research Center The CRC has been governed by an MOU between its partners, including the BLM and the USFS (Attachments A and B). As stated in the MOU, the primary purpose of the CRC is to collect sound scientific data on the interactive effects of land use and climate The parties to this MOU intend that the research findings from the CRC may be used to develop land use solutions that meet human needs while maintaining ecological and economic viability in the region. To further the goals of the MOU, substantial study is being done on cattle grazing and operations on the Colorado Plateau. Research ranges from assessing whether Criollo cattle are better suited to arid rangeland regions to how soon cattle can be returned to lands that have been restored. CRC is also researching whether virtual fencing can help facilitate adaptive outcome based grazing management, which also improves upland vegetation, riparian resources, and sensitive wildlife habitat. Because the CRC is part of a cooperative effort that includes the BLM and USFS, we recommend that the Proposed RMP/Final EIS allow for and advance the research that the CRC is conducting. We provide specific recommendations on this in the Livestock Grazing and Visual Resources sections below.	ALT07-Modification of Existing Alternatives, DECI05-Cooperating Agency Relationships, DATA03-Suggest Additional Data Source	Partnerships are important to the agencies and this plan will not preclude the agencies from developing and implementing MOUs with partners. The Proposed Plan in the Inventorying, Monitoring, Science, and Indigenous Knowledge section says that the agencies would collaborate with the BEC on proposals for scientific research and that the agencies would collaborate with the BEC to facilitate increased scientific research and increased understanding of Traditional Indigenous Knowledge to further understanding of BENM objects.
17969-3	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	BLM Cooperative Agreements In September 2023, TNC entered into a cooperative agreement with the BLM Headquarters Aquatics Division to implement low-tech process-based restoration (LTPBR) on riparian areas and wet meadows in up to seven priority BLM landscapes, including Southeast Utah and BENM (Attachment C). This work includes restoration structures like beaver dam analogs, low-tech rock structures, and related riparian and wet meadow restoration approaches. The goal of this agreement is to complete process-based restoration on 100 stream miles, including 20+ miles in Southern Utah, over the next five years. TNC is currently implementing process-based restoration on North Cottonwood and Indian creeks on the deeded lands of TNCs Dugout Ranch. TNC is also coordinating with the Canyon Country District Office and Monticello Field Office to expand this work to BLM and USFS portions of these creeks, and to identify needs and priorities for process-based projects on other lands in BENM in concordance with our cooperative agreement, the BEC, and this RMP. TNC recommends that the proposed RMP/Final EIS accommodate and allow process-based restoration techniques to facilitate and enhance riparian restoration to ensure TNC can fulfill obligations in our BLM cooperative agreement. We provide specific recommendations on this in the Water Resources section below.	ALT07-Modification of Existing Alternatives, DECI05-Cooperating Agency Relationships, WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	See the Proposed Plan in the Water Resources section. This type of work to protect water resources is important for the protection of BENM objects and the agencies have included actions that allow for this continued important work.
889-23	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	It is imperative that the agencies consider the access needs of disabled users in drafting the alternatives for the Bears Ears National Monument Management Plan and ensure that people with disabilities who depend on motorized means do not lose access. Such consideration is also required by the BLMs recently adopted Equity Action Plan that was released by the Department of Interior in April 2022. The Forest Service has a similar Equity Action Plan. The DOI Equity Action Plan recognizes that off-road routes create a form of access to public land for those with disabilities, and specifically identifies limited physical access as a barrier that prevents people with disabilities from recreating on public lands. Limiting the areas motorized vehicles can access limits those users who want to experience public land and contradicts the DOI Equity Action Plan. Therefore, the agencies should analyze how the proposed closures would undermine the objectives of their respective Equity Action Plans.	ALT07-Modification of Existing Alternatives, DECI07-Compliance with other laws and policies, TRAVEL01-General	Under the Proposed Plan, Arch Canyon is not designated as OHV closed. Motorized and non-motorized use in Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon. The agencies manage motorized recreation in accordance with applicable law and the Rehabilitation Act.
889-19	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We are also concerned by the fact that some alternatives (including alternative E) include harsh group size limits on almost all forms of recreation across the monument. Aside from the severe harm this would cause to long established events like Easter Jeep Safari and the Jeepers Jamboree (which currently use routes such as Chicken Corners, Lockhart Basin, Hotel Rock, and Arch Canyon), we believe that severely restricting group sizes unconstitutionally violates Americans right to freedom of assembly under the First Amendment. While the First Amendment permits some reasonable time, place, and manner restrictions on both expressive and non-expressive gatherings, such restrictions must generally satisfy strict scrutiny and be narrowly tailored to meet a compelling government interest. Radically restricting group sizes across the monument would not be narrowly tailored to meet any legitimate government interest, as what interest the government has in protecting the environment and visitor experiences could be met in other ways. There is also a high likelihood that restrictions on group sizes and special use permits could violate the Free Exercise Clause of the First Amendment as well, when applied to religious groups. It is highly likely that any limitations on group sizes would not apply to tribal members, as the BEITC management plan proposes to exempt tribal members from these limits. If the same group size limits or prohibitions on organized events do not equally apply to say, a Mormon group visiting sites of historical significance to them and a native group gathering for a tribal religious ceremony, that would be unconstitutional religious discrimination and would violate the Mormon groups free exercise and freedom of assembly rights under the First Amendment. It would also likely be found to unconstitutionally discriminate based on race/ethnicity in violation of the 14th amendment. We therefore oppose the imposition of any arbitrary group size limits as currently proposed in several alternatives including alternative E. The	ALT07-Modification of Existing Alternatives, DECI07-Compliance with other laws and policies	While private group size thresholds are identified in the Proposed Plan for Management Zones, larger group sizes may be considered under a special use permit. These limits or constraints would apply to all members of the public equally. The Proposed Plan is consistent with applicable laws and regulations.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			BLM and Forest Service must carefully evaluate any group size or special use permit regulations in the draft management plan for constitutional compliance and ensure that all such limits are narrowly tailored to meet a compelling governmental interest. No alternatives should be adopted that would be likely to fail to withstand judicial scrutiny under the First Amendment.		
889-39	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	While draft management plan seemingly does not intend to require the closure of the Peavine Corridor road in any alternative, we are concerned that as long as the Peavine Corridor is fully within a Primitive ROS zone, the plan guidance for that ROS class will be interpreted to mandate its closure to motorized use in the next travel management process. Such closure would not only contradict the clear intent of Congress that this corridor remain open to motorized recreation, but it would also contradict the specific plan direction in both the Bears Ears Management Plan and the Manti La-sal Forest Plan regarding the Peavine Corridor which allows for continued motorized use. ROS zones in the RMP should be largely descriptive of existing conditions and should not pre-determine the outcome of future travel planning. If (despite the clear intent of Congress to the contrary) the Peavine Corridor is to be closed to motorized use, that decision should be made with proper public involvement and after full consideration of all alternatives through the travel management process, without a specific outcome being mandated by the Monument Management Plan. Accordingly, we request that the ROS maps in the final monument management plan be modified to locate the Peavine / Dark Canyon Corridor roads within a cherry-stemmed semi-primitive motorized ROS zone (similar to nearby motorized routes), which would alleviate all of the concerns expressed above.	ALT07-Modification of Existing Alternatives, DECI07-Compliance with other laws and policies	Closing the motorized route in the Peavine corridor is not being proposed in this Plan. The route was "cherry stemmed" within the Dark Canyon Wilderness, but that does not relieve the USDA Forest Service from ensuring that the route does not have impacts on the important riparian resources and BENM objects located within the Peavine Corridor. The scale of the maps makes them difficult to see the area adjacent to the Peavine Corridor but the cherry stem is located within a Semi-Primitive Motorized ROS Class in Alt A.B.C and D and in an Outback Zone in Alt E and the Proposed Plan.
889-40	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	If the Peavine Corridor were closed, it would be a devastating loss to all user groups who rely on it to access this remote portion of the Dark Canyon Wilderness. I drove the full route (except for a portion of NFSR 55378 past a large washout) in May of 2023 and found this road to be a true hidden gem with beautiful scenery and overall light use that is not causing any significant impacts. While portions of the road in a large floodplain need better signage to prevent users from getting lost and causing trail braiding, with proper management there is no reason this road cannot continue to be used by vehicles long into the future. Given the clear Congressional intent that the Peavine Corridor remain open to motorized use, we believe the Bears Ears management plan should also include clear direction to the effect that, The Peavine Corridor shall remain open to motorized use in perpetuity. As Senator Garn said in 1988, When a decision of this nature is made by elected representatives of the people, I believe it is the duty and obligation of the resource managers to comply. The Bears Ears National Monument management plan should therefore not make any provision for the closure of these valuable motorized routes, but should instead require that they remain open to motorized use in perpetuity while managing them to minimize negative impacts. These two things are not mutually exclusive. The management plan must recognize and abide by the clear intent of Congress that motorized use of the Peavine Corridor be allowed to continue, while also managing them to minimize impacts through means other than closure.	ALT07-Modification of Existing Alternatives, DECI07-Compliance with other laws and policies	Closing the motorized route in the Peavine corridor is not being proposed in this Plan. The route was "cherry stemmed" within the Dark Canyon Wilderness, but that does not relieve the USDA Forest Service from ensuring that the route does not have impacts on the important riparian resources and BENM objects located within the Peavine Corridor.
9296-8	John Carter PO Box 464 Bondurant, WY 82922	Yellowstone to Uintas Connection	While I think tribes should have input like other Americans, it is problematic to raise their wishes above those of other citizens. It is also problematic to deflect to Traditional Ecological Knowledge (TEK) for BENM activities without defining the parameters involved. I can understand the use of medicinal plants and food plants, pinyon nuts etc., but I have seen no scientific evidence of the use of cultural burning, livestock grazing or other TEK. You must define each practice to be used, where and how it will be used, access for its use, and validate its use by comparisons to the scientific literature. This is also a problem in regards to NEPA. You cant satisfy the hard look requirement without taking a hard look. This means analyzing each traditional practice, its history of application, its effectiveness, and the scientific evidence that supports it. Otherwise, it fails the NEPA test in many ways. Without defining each of these practices you cannot analyze environmental impacts, or cumulative effects.	ALT07-Modification of Existing Alternatives, DECI07-Compliance with other laws and policies, TIK01-Traditional Ecological or Indigenous Knowledge	Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. Traditional Ecological Knowledge, just as Western Science, is simply a method for generating knowledge. As stated in the Traditional Indigenous Knowledge section is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives. This RMP/EIS informs the decision of how Traditional Indigenous and Ecological Knowledge would be incorporated in management of the Monument; incorporation of Traditional Indigenous and Ecological Knowledge in implementation level projects will be analyzed in site-specific NEPA.
8999-3		International Mountain Bicycling Association	Monument designations under the Antiquities Act have become important to the mountain bike community for their remote offerings and based on the sheer size of many modern landscape scale designations. Diverse recreation, including mountain biking, is a considerable and sustainable economic generator in the United States and investment in outdoor recreation resources and amenities proven to be a recession and pandemic proof investment. New management plans for National Monuments like BENM present an opportunity to craft agency land management that permanently protects the intrinsic values of deserving landscapes and provide for the ways that people recreate to enjoy them.	ALT07-Modification of Existing Alternatives, EJSOC01-General	Discussions on impacts on social conditions and access and quality of nonmarket values, including those associated with recreation, are included in the Draft EIS in the Environmental Justice and Social and Economic Values section.
8999-9		International Mountain Bicycling Association	Trail systems like those provided for by the BLM field offices around UT have a direct correlation with public health and wealth. Trails bring value to public lands and the communities they serve. The economic value this generates can translate directly into conservation value for the Monument. The BENM is a large landscape that currently is devoid of mountain bike trail designations from a practical sense. Roads are not the type of access or experience that mountain bikers are seeking unless they are overnight bikepacking. We fully understand that Monuments are not about recreation as the focus, but it is through recreation that people come to experience and appreciate the natural wonders and historical significance of these places. Mountain biking is not a homogenous sport and it spans the spectrum of family and children bike explorations, to single track adventures and day trips, to bike-packing and purpose built technical skill trails. IMBA does not claim that mountain biking is	ALT07-Modification of Existing Alternatives, EJSOC01-General, TRAVEL01-General	BENM does contain designated mechanized trails, including the relatively newly designated Bluff River Trail. The agencies appreciate this comment and have considered ways recreation use on the landscape is compatible or not with protecting BENM objects. Travel and Transportation Management se for modes of travel and where the agencies will consider different options for future designations for travel. For impacts to recreation use see chapter 3 in the Recreation and Travel and Transportation management sections.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			appropriate everywhere but within the spectrum described here, there should be plenty of ways for the BLM to provide new and improved opportunities on the BENM. For these reasons, we contend that mountain bike access to the National Monument is appropriate and we are pleased to see this addressed positively in the BENM proclamation.		
18657-69	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	We note that, anecdotally, a significant and growing number of racial minorities (especially Latinos) have recently been getting involved in motorized recreation driving side-by-sides and UTVs. From personal observations while off-roading in both Colorado and Utah, a significant proportion of UTV drivers are Hispanic. These vehicles seem to appeal to that demographic in ways that traditional off-road vehicles or other outdoor activities like hiking or mountain biking historically have not. Motorized recreation (specifically OHV use) is therefore playing a major role in diversifying recreation on western public lands, which is one of the primary goals of the DOIs Equity Action Plan. Eliminating a significant amount of motorized recreational opportunities in BENM therefore runs counter to this goal and disproportionately affects racial and ethnic minorities who prefer motorized recreation over other forms of outdoor recreation. For that reason as well, the action alternatives presented in the draft RMP are broadly overreaching towards conservation and should be rejected or scaled back to a more balanced approach that allows for both conservation and outdoor recreation access to be protected for perpetuity.	ALT07-Modification of Existing Alternatives, EJSOC02-EJ Populations	The BLM added additional information to the Environmental Justice and Social and Economic Values section, of the EIS in Appendix N to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment and those who identify as being part of an environmental justice population, who value motorized recreation.
17573-91	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.7.3 Hazardous Fuels (page 2-27) Hazardous fuel treatments should be used to restore ecosystems and wildlife habitats. Treatments should be prioritized in high-value high-risk areas. Alternative B, animals needs to be clarified (e.g., domestic, naturalized, or native). Alternative C, treatment areas should include crucial wildlife habitats as a priority. Alternative D and E, need to include DWR and WRI as collaborators.	ALT07-Modification of Existing Alternatives, FIRE01-General	Critical habitat was considered within the range of alternatives presented in the draft RMP/EIS. Further clarification on traditional use plants or animals would be determined at the implementation level in collaboration with the BEC. As discussed in the Fuels, Wildfire, and Prescribed Fire section of Appendix N, the agencies collaborate on fuel management projects through interdisciplinary partnerships with the Utah Watershed Restoration Initiative (WRI). Additionally, the Wildlife and Fisheries section of Chapter 2 notes that the agencies will manage habitat for species conservation to incorporate Tribal and Utah statewide conservation strategies, in coordination with Utah Division of Wildlife Resources (UDWR). Coordination with UDWR would encompass coordination with the WRI partnership.
18696-7	Julian Soncco		In terms of fire pan usage in the monument, ceremonies require fire to be burned in certain ceremonial spaces. We must allow for the use of ceremonial wood/fire to be unrestricted. Please consider a permitting process created by the Bears Ears Commission.	ALT07-Modification of Existing Alternatives, FIRE01-General, PUBLO2-Bears Ears Commission	Ceremonial use of vegetation and wood products was considered within the range of alternatives presented in the DEIS. Close collaboration with the Bears Ears Commission is also incorporated into management actions for all alternatives. No change to Alternative needed. See the Cultural Resources section including the Management Actions Common to All section. See the Proposed Plan in the Recreation and Visitor Services section, for changes to campfire management actions.
14767-152	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	For woodlands, the BLM promises to: Agencies would collaborate with BEC and Tribal Nations to incorporate Traditional Indigenous Knowledge to establish and implement forest health and forest management standards and guidelines to assess conditions and guide management decisions for wood products. Again, collaborate to plan. What are these standards? Well they have not been created yet so its impossible for the agency to honestly analyze the impacts of them or determine that they protect and restore all objects. This section proposes status quo timber harvest, yet utterly fails to explain how timber sales and the like protect and restore the objects. It lets this status quo degradation continue unless they monitor and find problems. Simply dont monitor and it can move ahead as usual. Loophole after loophole to maintain the status quo for resource extraction.	ALT07-Modification of Existing Alternatives, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Proposed Plan allows for a wide variety of treatments which would be considered through implementation level planning through site specific analysis. Traditional ecological knowledge would be considered through collaboration with the BEC during the implementation phase.
14265-5	Korina Riggin		Permit system for firewood cutting	ALT07-Modification of Existing Alternatives, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	Under the Proposed Plan, authorizations for private use of wood products would continue to be issued to the public in accordance with applicable law. The Wood for Life program would continue under the Proposed Plan.
3125-17	Steve Knox		Page 2-22, Water Resources, Table 2-5, 1st action at top of table Why wouldnt you include this action (closure of riparian zones to woodcutting) in the more protective Alternatives D and E? The action seems to fit with the theme and intent of those alternatives.	ALT07-Modification of Existing Alternatives, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting), WAT01-General	See the Alternatives for Forestry and Woodlands table: Prohibit floodplains, riparian and aquatic areas, and springs from wood product use except where inconsistent with the Religious Freedom Restoration Act and other applicable laws. Private collection of wood products would not be prohibited where such prohibition constitutes a substantial burden on religious practices. Agencies would collaborate with the BEC and Tribal Nations on identification of those uses.
9255-8	Keith Alleman		Regarding the bullet on forest and wood product harvest, I like the idea in Alternative E of using monitoring to guide restrictions that can be changed to suit conditions. However, I think that if this alternative is selected, it should include some sort of guardrails to ensure that administrative discretion is not totally abused. For example, the strategy could be like Alternative E but include a provision that in each calendar year (or management year, whatever that might be) at least 360,000 federal acres will be closed to wood product harvest during that year, to include whatever acres are permanently closed.	ALT07-Modification of Existing Alternatives, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	See the Forestry and Woodlands section of Chapter 2 where the Proposed Plan includes acres closed to wood product harvest as well as provides management action guidance to determine how the acres that are open to wood product harvest would be managed, including monitoring for impacts to soil and vegetation and adaptability to close areas to wood product harvest based on identified impacts in the future. In any given year no fewer than the listed acres under the Proposed Plan would be closed to wood product harvest.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
9296-7	John Carter PO Box 464 Bondurant, WY 82922	Yellowstone to Uintas Connection	The RMP allows wood harvest on up to 68% of the BENM. Wood cant be harvested without traveling to the place of harvest. This implies roads, trails, ohv and pickups going cross country. All these activities disturb the soil, break up soil crusts and accelerate erosion. This must be analyzed and reported with areas designated so it is not a free-for-all.	ALTO7-Modification of Existing Alternatives, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	Under the Proposed Plan, cross-country OHV travel for wood product harvest would not be allowed. See the Forestry and Woodlands section for a discussion of impacts on soils from wood product harvest.
9524-3	379 Ridge View Drive Grand Junction, CO 81507; Sherry Schenk		i also hope that a wood and firewood harvesting permit system that incorporates tribal consultation and leadership as to how this system would best be designed, implemented, and allocated would be incorporated into the plan.	ALTO7-Modification of Existing Alternatives, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Management Actions Common to All Alternatives in the Forestry and Woodlands section states "authorizations for private use of wood products would continue to be issued to the public, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations. This coordination would also, if appropriate, include identifying areas for seasonal or multiyear closures to allow regeneration of woodlands or to provide for traditional or ceremonial uses as appropriate.
1837-2	William Facinelli		First, monument resources should be protected from overgrazing by limiting use to 30% until land managers can analyze whether a higher number is acceptable.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
1116-1	Bill Gardner		Also, if a utilization level of 30% is found to be too high a level to protect the monuments ecosystems and its objects, please don't hesitate to reduce the grazing utilization level. Cattle grazing has proven to be extremely detrimental to ecosystems, watersheds, and local wildlife, consequently it should be closely monitored.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines. Utilization levels would take forage needs of wildlife into consideration and are monitored. Livestock grazing is currently monitored through both short-term (utilization levels, actual use data) and long-term (AIM, range land health, trend) monitoring which monitoring would continue.
11467-1	Greater grazing reductions are needed		Among many other problems, livestock grazing is the major reason for the expansion of cheatgrass and the related devastating fires. The attached report documents this grazing and cheatgrass connection. Like in many other places, BENM objects are threatened by cheatgrass expansion and habitat converting fires. Please revise at least Alternatives D and E to substantially reduce grazing.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	See Proposed Plan in the Goals and Objectives of the Livestock Grazing section, which states that agencies would: "manage grazing to minimize or eliminate intrusion of invasive grass and plant species due to grazing-related activities." The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing
14767-160	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Next to Section 2.4.22.2: Manage livestock grazing, subject to appropriate terms and conditions, in a manner consistent with the protection of BENM objects, including during periods of drought. What are the terms and conditions that would fully protect and restore all objects? The BLM has no idea, the EIS is silent on that fundamental issue. How would these terms and conditions be implemented when permits are renewed under 402c2 with no changes to terms and conditions?	ALTO7-Modification of Existing Alternatives, GRAZO1-General	All BLM permits include the following stipulation: Grazing management practices will comply with Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah (1997). This is very similar to what is included in Appendix G. These BMPs protect objects. Included in the Livestock Grazing section in Chapter 2 is the agencies would prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments, to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals.
14767-51	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The goal of BLMs land management and its impacts to wildlife should be to achieve and maintain natural populations, population dynamics and population distributions. Management actions should be taken to protect and preserve the biodiversity, integrity and population viability of wildlife. BLM actions should preserve the integrity of wildlife corridors, migration routes, and access to key forage. A failure by the BLM in its EIS and DRMP to analyze utilization, stocking rates and precipitation is a failure to meet NEPA requirements for analysis. The failure to provide sustainable utilization rates for upland and riparian area herbaceous vegetation, aspen suckers and riparian shrubs and incorporate those into grazing permits as terms and conditions leaves management uncontrolled and subject to bias, violating FLPMA. We have provided in C_Grazing Capacity Info Proposed Outline, a scientifically and legally defensible methodology for determining capability and suitability of BLM lands for livestock grazing. We request the BLM incorporate this process into the RMP as well as the EIS alternatives.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	Implementation level decisions, such as grazing permit renewals, will be able to guide the management and set terms and conditions within the permit which would cover utilization of key forage plants and utilization within different riparian areas. Any AMPs that have been completed in the past for allotments are the current guidance the permittee. Any utilization values set for upland and riparian areas can be found in the AMPs. Grazing permit renewals developed after the RMP will incorporate utilization levels to be part of the permit terms and conditions. The BLM has developed a scheduled outside of this plan to complete NEPA on allotments in BENM as fully processed permit renewals.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15381-18	Sagebrush Habitat Conservation Fund		In ACECs and other areas with proposed prohibitions on surface disturbing and/or discretionary activities, somehow livestock grazing is allowed to continue. Livestock grazing has been and will continue to be a major change agent affecting the ecological health landscape and cultural objects of the Monument. It is deserving of much more thoughtful consideration than is afforded in this RMP/EIS.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
15980-6	Payton Halls		My familys grazing management practices are consistent with standards that maintain, protect, and restore the rangeland health and well-being, to use words from the BENM Livestock Grazing goals and objectives. Management actions common to all alternatives (2.4.22.2) should ALSO include collaboration with local ranchers who know what they are doing. Their grazing practices are most consistent with Grazing Alternative A and B.	ALT07-Modification of Existing Alternatives, GRAZ01-General	The Livestock Grazing section of Chapter 2 includes management to collaborate with the BEC and grazing permittees when developing grazing permit terms and conditions. Additionally, the NEPA Process includes coordination with stakeholders which includes local ranchers and permit holders.
16236-4	Michael Painter Californians for Western Wilderness, P.O. Box 210474 San Francisco, CA 94121	Californians for Western Wilderness	BLM and USFS should, to the extent possible, encourage (though not coercively) the retirement of livestock grazing allotments, rather than passively waiting for a rancher to decide to do so. There are too many cultural sites with too many cow pies present. Cattle can cause damage to sites, as well. With that in mind, a strict and comprehensive system of monitoring of livestock must also be implemented, in order to adequately protect riparian areas, springs, seeps, and other commonly impacted areas.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Cultural Resources, and Water Resources sections include management actions for the protection of water resources and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
1659-4	Eve Tallman, UT		It is disappointing that all Alternatives allow for grazing in the vast majority of the Monument. It is clear that many areas proposed as Remote or VRM I will also allow grazing, which are contradictory concepts. I am grateful that there are some considerations for retiring leases with an option to end grazing in areas of the Monument in perpetuity. It is deeply concerning that there is a proposal to disallow off trail hiking (by humans) in most of the Monument, while simultaneously allowing (off trail) grazing in more than 70 percent of the Monument across all Alternatives.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan includes additional acres as unavailable to grazing as described in the Management Actions by Alternative table in the Livestock Grazing section. The Proposed Plan encourages the public to use existing and designated trails when hiking, but does not disallow it.
17358-2	Ramona Blaber Oak Park, IL	Sierra Club	I would like there to be a lower cattle grazing number and a retirement from the current number of grazing allotments. There were tribal comments speaking of harmed stream beds, destroyed local native plant materials, and vanishing seasonal water.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section has fewer acres available/suitable for grazing than Alternative A. The Proposed Plan in the Livestock Grazing section and Water Resources section includes management actions for the protection of water resources and vegetation. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
17358-9	Ramona Blaber Oak Park, IL	Sierra Club	Life stock grazing should be restricted a not allowing in national parks since life stock is not a natural species and it using national land to profit a farmers not a people. Life stock contaminate water sorces at park and eat what belongs to other animals who try to survive living in a parks. Natural habitats of this national park should not be destroyed by any human activities to benefit any humans including farmers. Animals in national parks has to be protected and live comfortably natural life?s and be protected by park laws with proper management.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Water Resources, and 2Wildlife and Fisheries sections include management actions for the protection of water resources and wildlife. This RMP/EIS is a planning process for a National Monument and is not managed according to NPS regulations.
17847-1	Margaret Stone		Improper grazing control has caused and will continue to cause significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas and soil. Grazing management should be improved by requiring resource assessment and livestock monitoring. New water development needs to be prohibited and livestock excluded from perennial surface water and riparian areas and streams. Retirement of grazing allotments should be encouraged.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Improper grazing is not included in any alternative, including the Proposed Plan. The Goals and Objectives of the Livestock Grazing section and Appendix G includes managing livestock for the standards for rangeland health for biotic integrity, soil stability, and hydrologic functions. In the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. On BLM-administered lands, a current land health assessment completed within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. The retirement of lands subject to a voluntarily relinquished livestock grazing permit or lease provided for in the plan consistent with by Presidential Proclamation 10285.
18082-40	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Finally, we recommend the BLM consider many of the management actions under Alternative D for the Final EIS chosen alternative (e.g., utilization levels would be 30% until monitoring data are used to identify an appropriate utilization level, prohibitions on new water and range developments, and restrictions for existing water and range developments) since they appear to be more protective of Monument ROVs.	ALT07-Modification of Existing Alternatives, GRAZ01-General	The Proposed Plan incorporates some of Alternative D. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					baselines. Under the Proposed Plan, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. For BLM, a current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. Under the Proposed Plan, existing range improvements for livestock grazing not consistent with the protection of BENM objects would be removed, modified, or abandoned to be consistent with such protection.
18295-5	Kira Ratcliffe		Finally, it is concerning to me that this management plan allows for what may one day be extensive restrictions for climbing and hiking while still allowing for extensive grazing. The same level of resource degradation thresholds or impacts used to restrict climbing and other recreation should be applied to grazing. I understand that ranching, in some ways, is considered a more historic and thus acceptable use of the area. However, this is a new management plan in a new era and ranchers should be held to the same standards as the rest of us. if anything, they should be held to a higher standard because they are profiting off our shared public lands. It seems unreasonable to restrict the off-trail travel of humans when cows are roaming over 80% of the monument.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section includes areas that are available/suitable and unavailable/unsuitable to grazing. Under the Proposed Plan the public would be encouraged to stay on designated or existing trails when hiking
18330-11	Rose Chilcoat 2914 Junction St Durango, CO 81301		The draft RMP makes economic arguments for continued livestock grazing as individual ranchers livelihoods are considered. It completely fails to look at the economic costs to the resources and the taxpayers of continuing this destructive and inappropriate use in this arid landscape. Livestock grazing within the Monument is for the most part not done by tribal members and so reducing active allotments should have minimal impact on tribal interests.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
18330-6	Rose Chilcoat 2914 Junction St Durango, CO 81301		Within a National Monument there should not be utilization of forage in excess of 30% - ever! Leave some for wildlife. Existing utilization is exceeded most years leaving next to nothing on the land. Utilization must actually be measured! Not done via ocular estimation. Cattle should not be in waterways and springs creating conditions that look and smell like stockyards. Fencing them out or simply not authorizing use in those areas is necessary.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative table in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines. The Proposed Plan includes management for the protection of water sources in the Livestock Grazing section and Water Resources section.
18612-12	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	Address livestock damage to monument objects by other means (reducing stocking rate, changing season of use) before installing water sources or range improvements.	ALT07-Modification of Existing Alternatives, GRAZ01-General	In the Management Actions by Alternative table in the Livestock Grazing section the Proposed Plan would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. Also, under the Proposed Plan the agencies would develop and implement allotment management plans (AMPs) for all allotments within BENM as necessary, in collaboration with the BEC. Development and implementation of AMPs would include analysis of the allotment, including evaluating range improvements and stocking rates, as needed, and ensure consistency with protection of BENM objects.
18612-5	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	The National Landscape Conservation System focus on conservation directs BLM to develop a science-based grazing management program that protects natural and cultural resources. Cattle grazing should not adversely affect the objects for which the Monument was designated. Some of the allotments listed for closures in Alt D on page 2-125 contain objects that are not being protected. Others contains values for which Bears Ears was designated and would be good candidates for restoration and protection from grazing. Some of these values are detailed below: BUTLER WASH 1 - negatively affected by current cattle grazing - contains an abundance of cultural resources. - contains ecologically valuable riparian areas - is popular for recreation MOQUI CANYON LOWER 2 - identified by name in Proclamation as a Monument object requiring protection. - contains riparian communities and wildlife habitat - contains archaeological sites - has livestock impacts documented by Grand Canyon Trust (heavy browsing of woody riparian vegetation, trampled and eroding streambanks, cattle feces deposited directly in the water, and a proliferation of disturbance-induced non-native vegetation.) HARTS DRAW PASTURE 3 - Fails to meet some standards; monitoring reports say that changes needed include reduction in AUMs and utilization, better livestock distribution, improved rotation, less use, change in season of use. - Contains old crested wheatgrass seeding, which attract heavy use and damage by cattle and wildlife seeding has lost much of its usefulness for livestock grazing due to decreased forage production - Heavy cheatgrass infestation threatening to expand - Functional vegetation groups departed from expected ROAD CANYON PASTURE 4 - overall trend is down but improving. Already closed to grazing. SLICKHORN PASTURE 5 - Trend on the Slickhorn Pasture is down, although other pastures in allotment have stable trend. Monument objects not being protected. SLICKHORN CANYON PASTURE 6 - According to Grand Canyon Trust, this area includes other important canyons that drain into the San Juan River, including an unnamed canyon between Slickhorn Canyon and Point Lookout with healthy riparian areas and cultural resources (see NGO	ALT07-Modification of Existing Alternatives, GRAZ01-General	Allotments on NFS and BLM lands will continue to be monitored during implementation planning as part of rangeland health assessments. For NFS lands, a large portion of the Dark Canyon Wilderness is currently closed to grazing including Woodenshoe Canyon and Dark Canyon located down canyon from Rig Canyon. If monitoring indicates livestock grazing is impacting the protection of BENM objects, appropriate changes to livestock grazing management would be implemented to mitigate those impacts in a manner that ensures protection of BENM objects. As summarized in the Livestock Grazing section under all alternatives, the BLM and USDA Forest Service would work with permittees and the BEC to develop and implement grazing management plans for all allotments within BENM. This would occur during the scheduled permit renewal process to ensure management does not compromise Monument objects and to also help improve range conditions.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			comments). - not actively grazed. INDIAN CREEK 7 - The overall trend in 2019 is down on all pastures in the Indian Creek allotment. - Shift in functional groups from cool season to warm season grasses. - Severe drought in 2018 but cattle still grazed allotment - Invasive grasses and crested wheatgrass prevalent - current permitted Active AUMS near or above the allotments forage production level on a sustainable basis. - Indian Creek Lower 8 – not currently being grazed. Grand Canyon Trust recommends it be unavailable for grazing POINT LOOKOUT PASTURE - inaccessible to cattle. Good reference area. JOHNS CANYON 9 - contains canyon bottom riparian communities and wildlife, which are identified as monument objects. - monument objects negatively impacted by cattle, including degradation of water quality by cattle feces, a proliferation of disturbance-induced non-native vegetation, and trampled biological soil crust along with large areas of bare ground - already being considered as an ACEC in Alternative E, with relevant and important values ranging from paleontological, cultural, scenic, fish and wildlife, to threatened species (Navajo sedge [Carex specuicola]). DARK CANYON UPSTREAM OF RIG CANYON/PEAVINE CANYON DARK CANYON 10 - identified in Proclamation as a Monument object to be protected - hanging gardens, springs, riparian areas - habitat for wildlife, including Mexican spotted owls. - culturally significant plant species. - riparian areas being degraded by cattle grazing. Erosion is common, vegetation functional groups are not as expected. TUERTO CANYON 11 - identified as a Monument object - riparian communities and wildlife habitat - Ancestral Pueblo sites - ungrazed riparian areas NORTH COTTONWOOD PASTURE AND NORTH COTTONWOOD UPPER PASTURE 12 - identified as a Monument object in the proclamation - riparian communities and the wildlife dependent on them across the Monument. - cultural sites - negatively impacted by cattle, including excessive browsing of woody riparian vegetation, trampled and eroding streambanks, heavily grazed understory vegetation, and excessive bare ground.		
18612-7	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	Recommendations - include a commitment for full NEPA by including language from Alt D on page 2-129. We suggest the following: - Prioritize the full NEPA review and processing of grazing permits and leases, including compliance monitoring and resource assessments, to protect Monument objects. - Include similar language for the Forest Service allotments with the 10 year time limit, full NEPA with public input, and a provision to decrease permitted use if necessary	ALT07-Modification of Existing Alternatives, GRAZ01-General	The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of the ROD. The BLM has developed a scheduled outside of this plan to complete these and the other allotments in BENM as fully processed permit renewals.
24-1	George Wuerthner POB 8359 Bend, 97708		There should be no livestock grazing in the national monument. The landscape is too arid and fragile for livestock operations. Livestock destroys biocrust, riparian areas, wildlife, recreational experiences, pollutes water, and compacts soil.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, Wildlife and Fisheries and Recreation and Visitor Services sections include management actions for the protection of water resources, soils, vegetation, wildlife and addressed conflicts with recreation. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely.
27-1			Although the BLM preferred alternative is generally good, BLM obviously wimped out on livestock grazing. Minor grazing reductions wont adequately protect BENM objects. More significant grazing reductions are necessary.	ALT07-Modification of Existing Alternatives, GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely.
3846-3	Jean Naple		I am very concerned because improper grazing has caused, and continues to cause, significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan should require the agencies to immediately begin compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs.	ALT07-Modification of Existing Alternatives, GRAZ01-General	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the Management Actions by Alternative table in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only unless a current (within the last 10 years) land health assessment has been completed.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
3867-2	Judy Buckinghsm		Improper grazing needs to stop. It causes significant damage especially to water sources. The final plan should include compliance monitoring and exclude livestock from perennial surface water, riparian areas, and springs.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	The Livestock Grazing section and Water Resources section of the Proposed Plan includes management actions for the protection of water resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
687-1	Roger Rosentreter		The livestock trampling only leads to more invasive grass. Please improve the grazing or eliminate it.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The range of alternatives for grazing management in the Draft RMP/EIS includes management that would reduce the amount of grazing allowed on BENM to protect Monument objects, and the Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section has fewer acres available/suitable for grazing than Alternative A.
765-1	Norman Angerhofer South Jordan, UT 84095		Concerning grazing within the Bears Ears Monument: 1. I recognize that ranchers have certain pre-existing grazing rights which may lie within the monument. These must be considered. 2. However, I also have seen, with my own eyes, destruction of both the grazing lands and of archaeological objects, due to grazing: a. From the trailhead for Horseshoe Canyon here in Utah and into the canyon, there are areas which were overgrazed. Now all the topsoil is gone, and only rock remains. b. Southwest of Bluff Utah, between the San Juan River and Comb Ridge, cattle grazing has resulted in massive erosion in the lower Butler Wash. 15-foot chasms cut through ancient camp sites and erosion has destroyed much of the topsoil. 3. Therefore, I request that grazing within the Monument be tapered off and stopped where possible, to preserve the delicate soil and to protect the ancient sites from further erosion and destruction. 4. Also, any grazing which continues within the Monument should be monitored. If there is evidence of erosion or destruction of the native grasses and other plants, then grazing should be stopped immediately.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	Section Livestock Grazing section and Cultural Resources section of Chapter 2 includes management actions to protect cultural resources. The Proposed Plan includes additional acres on BLM made unavailable to grazing or limited to trailing only than is currently grazed. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
8305-11	Tracy Bodnar		Cattle grazing should be excluded in riparian areas and in areas surrounding cliff dwellings in the Comb Ridge and Butler Wash areas.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	The Proposed Plan in Livestock Grazing section and Water Resources section of Chapter 2 include management actions for the protection of water resources. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan continues the these areas are unavailable to grazing: "Nine side canyons of Butler Wash and Comb Wash side canyons (Mule Canyon south of SR-95 and Arch, Fish, Owl, and Road Canyons)" These have been unavailable for decades. The Proposed Plan also adds two more areas in Butler Wash as unavailable for livestock grazing.
9174-1	Ken Gamauf, CO 80306-1777		Livestock grazing is damaging the same cultural sites, native vegetation, wildlife, habitat, soil, and riparian areas that the monument was designated to protect. This needs to change. The final resource-management plan for Bears Ears should require compliance monitoring and resource assessments from federal agencies, prohibit new water developments, and exclude livestock grazing from creeks, springs, riparian areas, and other habitats and cultural sites where its harm is incompatible with the protection of monument objects	ALTO7-Modification of Existing Alternatives, GRAZO1-General	The Proposed Plan in the Livestock Grazing, Water Resources, Water Resources, Vegetation, Wildlife and Fisheries and Visual Resource Management sections include management actions for the protection of water resources, soils, vegetation, wildlife and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the Management Actions by Alternative table in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only unless a current (within the last 10 years) land health assessment has been completed.
9232-2	A Utah citizen conservationist		Grazing is the most widespread use with the greatest potential to harm BENM objects. The Bears Ears Inter-Tribal Coalition Land Use Plan advises that cattle "be cared for properly so they dont destroy the land." Alternative E should include language requiring range riders to move cattle daily to prevent over-concentration in sensitive areas, particularly springs. Fences and livestock watering installations should be removed where possible.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Routine management of livestock includes the use of "cowboys" or "range riders" to distribute livestock, maintain range improvements, and other duties associated with livestock management. Requiring this is outside the scope of this Plan. The Proposed Plan in the Management Actions by Alternative table in the Livestock Grazing section prohibits new range improvements or modifying range improvements unless the primary purpose is project BENM objects and for BLM lands a rangeland health assessment has been completed within the past 10 years.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
9253-3	Stephen Trimble P.O. Box 750090 Torrey, UT 84775		Improper grazing damages cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan should require (and plea for funding) agencies to consstently monitor resource damage, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Visual Resource Management sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative table in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the Management Actions by Alternative table in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless the primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only unless a current (within the last 10 years) land health assessment has been completed.
9255-3	Keith Alleman		page ES-5. paragraph ES.4.1 States "Forage would not be reallocated for livestock grazing purposes unless...." Comment: Clarify what is meant by "forage." The common definition is that forage is food for domestic animals. Is that what you mean, that BLM has some hay or such and will not provide it to grazing operations? If so, I would think you would use the verb "allocated," not "reallocated." If the intent is to say that land would not be reallocated to grazing purposes, then say "land" or something like it. I know y'all are directly lifting language from 10285, but still, you should help the reader out. Adjust the wording if you can. And add "forage," in the sense that you mean it here, to the glossary, including explanation of how forage is a reallocatable BLM resource. [NB: Same comment applies to the same verbiage at page 2-5.]	ALTO7-Modification of Existing Alternatives, GRAZO1-General	Thank you for your comment. Your suggested addition of the definition of forage to the glossary has been done.
9255-6	Keith Alleman		Regarding livestock grazing, I would like to see less of the BENM open to grazing. I would like something much closer to the 410,000 acres designated as unsuitable in Alternatives C and D. Actually I'd like to see more; it is simply intuitive that the majority of BENM is relatively hostile to grazing (hostile relative to the nation's lands in general), and it is so bad for the health of the landscape. I would say that, as a general statement, cattle grazing is generally more degrading to the landscape than responsible on-trail OHV use is.	ALTO7-Modification of Existing Alternatives, GRAZO1-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan makes additional acres unavailable compared to current management. The potential impacts of livestock grazing is disclosed throughout Chapter 3.
15381-17	Sagebrush Habitat Conservation Fund		Appendix G. Best Management Practices Livestock Grazing Item # 1 states: Grazing management practices will be implemented that do the following: This is followed by eight points identified with letters, a though h. All these apart from h are aspirational in nature and not a discretionary management practice that could be implemented. They are the proverbial good intentions for future action, not management practices. Item h is directed by regulation and not a discretionary action by a manager. We suggest developing actual management practices here that prescribe actions. Where monitoring is called for, the monitoring techniques should be specified, and action triggers identified. Item #2 is aspirational and too non-specific to be considered a best management practice. Item # 3 is a matter of regulation and Standard Operating Procedure for BLM and should not be considered a best management practice. Item # 6 Why is intensive grazing the only kind of grazing that will be considered to manipulate rangelands? As the manager, BLM can prescribe the kind of grazing animal, the number of grazing animals, the season and duration of grazing use. All of these should be on the table as solutions, not just intensive grazing. Item #7 is a matter of Standard Operating Procedure and should be analyzed in the NEPA process for a proposed range improvement project. Items 9, 10 &11 are standard procedure and a matter of agency regulation and policy. There is no need to state them as a best management practice. Item 12. Why is one full growing season of rest, the BEST management practice for livestock grazing. Might longer rest periods be better? We suggest the best practice would be to monitor conditions after a burn and not reintroduce grazing until the recovery is complete and stabilized. Item 13. BLM has supposedly been monitoring utilization to determine capacity since the early 1980s. In practice there is nothing to show for 40 years of effort. Please see our previous comments on utilization and monitoring. Determining capacity is important but that cannot be done by utilization alone. Proper capacity estimations require consideration of site productivity and rangeland condition. Utilization can tell you what and how much livestock are eating, it cannot tell you whether that use is sustainable. Item 14 is strangely worded. Why only sites with potential for adverse impacts being considered for mitigation? Should not sites being actually damaged be the higher priority? By the way, the term of art from the NHPA and 106 regulations is adverse effects, not adverse impacts. This item is also a matter of regulation and policy rather than discretionary management.	ALTO7-Modification of Existing Alternatives, GRAZO1-General, DECI04-Mitigation and Monitoring	All monitoring would follow existing protocol and process. The BMPs listed in Appendix G are from the BLM Utah's guidelines for rangeland health and are just reiterated here. The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined the Livestock Grazing section in Chapter 2. Livestock management can be adjusted as necessary to meet these objectives for rangeland health. The RMP/EIS includes BMPs and guidance for monitoring. See grazing management actions in the Livestock Grazing section of the Proposed Plan.
16370-2	Wayne Hoskisson		The way grazing utilization is managed also needs to be changed. On far too many allotment assessments I noted the conclusion was that the allotment was progressing towards desired conditions or the ecological site description. The same conclusion seemed to be made many times without the allotment ever reaching the appropriate ecological site description. Whenever an allotment is assessed as progressing towards desired conditions the assessment should also include	ALTO7-Modification of Existing Alternatives, GRAZO1-General, DECI04-Mitigation and Monitoring	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization

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			when the BLM of FS expects the allotment to reach the desired condition and state specific actions to be taken if an allotment is not meeting those desired conditions. Generally the most effective actions would be rest and/stocking rate reductions. The BLM and FS are now managing a National Monument not a commercial livestock industry.		levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS. Also, under the Proposed Plan the agencies would develop and implement allotment management plans (AMPs) for all allotments within BENM as necessary, in collaboration with the BEC. Development and implementation of AMPs would include analysis of the allotment, including evaluating range improvements and stocking rates, as needed, and ensure consistency with protection of BENM objects. If there is an existing AMP, the agencies will consider whether the AMP needs to be renewed or adjusted in collaboration with the BEC.
14767-150	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Next moving to the goals for vegetation, we see the same thing, goals to plan: In collaboration with the BEC and Tribal Nations, use ESDs/Vegetation Condition Classes (VCC) to identify and manage for desired vegetation community composition and range of conditions for vegetation communities throughout BENM, including what communities are most appropriate for different areas, where traditional harvest can be used as part of the management of the Monument, and where fire can be used to return natural vegetative communities. So more collaboration to plan. So what are these desired vegetation community composition and range of conditions for vegetation communities? Do they fully protect and restore all the objects? That is completely unknown because the EIS is entirely silent on this. This violates NEPAs hard look mandate and violates BLMs planning and NLCS requirements.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	The Proposed Plan in the Livestock Grazing section include management actions that address grazing impacts on vegetation such as further acres made unavailable to grazing or limited to trailing only and working with the BEC to reassess stocking levels, seasons of use, and management approach. In addition, the Goals and Objectives of Livestock Grazing and Appendix G includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic functions.
15381-9	Sagebrush Habitat Conservation Fund		3.4.4.1.1. Terrestrial Vegetation The description of the affected environment is deficient in that it fails to address primary productivity and ecological condition. Both are important to understanding the vegetation and relate to other resources and issues. The Draft adequately describes wide area changes such a more bare ground, loss of cover, loss of bunch grasses and forbs. The document is deficient because it proposes no management actions to address these trends. The NRCS Rangeland Analysis Platform shows reduced production of perennial herbaceous plants and increases in bare ground across most of the BENM for over a decade. The Range Analysis Platform shows productivity below what the ecological site description indicates should be there, even in the most unfavorable years. It is concerning is there are no management actions proposed in response to these trends. Why in the face of reduced productivity, loss of palatable grasses, forbs, and shrubs, do all alternatives propose no change to the stocking rates or season of use for any of the allotments that remain available? Most of the stocking rates were assigned in the 1960s under higher production and a cooler, wetter climate regime. Meanwhile, cattle have been getting larger, two to three times the 700-pound live weight used to establish stocking rate. It is simply arbitrary and capricious to ignore all these changes to vegetation, climate trends, and propose continuance of established grazing. Likewise, the document gives lip service to Standards of Rangeland Health yet there is no disclosure of the current status.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	The BLM uses, in part, AIM data to determine land conditions, trends, plant groups, cover rates, and functions. Current conditions, based on AIM, data are discussed in the Soils and Biological Crusts and the Terrestrial Habitat and Vegetation Resilience and Conservation sections of Chapter 3, and in Appendix A. The definition of unavailable (BLM) and not suitable (USDA Forest Service) has been added to the final EIS. BLM Land Use Plan Handbook H1601 in Appendix C.II.B provides the criteria for identifying lands available or not available for livestock grazing. In the Proposed Plan, within the Management Actions by Alternatives section for Livestock Grazing, livestock would be physically restricted from these areas based upon topography (e.g., cliff lines) and/or fences. Site specific barriers (e.g., fences) would be done as a part of implementation level planning. Many of these areas have barriers or fences that already exclude livestock. This would not require areas being made unavailable in adjacent areas because existing barriers were used to form the boundaries. The Proposed Plan includes acres unavailable to grazing and limited to trailing only that are currently grazed. The unavailable allocation would take effect once the ROD is signed, however, the BLM would need to undertake additional processes to modify permits or to construct fences if needed to prevent access, if necessary. The Livestock Grazing section in Chapter 3 discuss allotment categories and how they relate to rangeland health.
17573-88	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	page 2-26 Alternative E No chaining on BENM- we should be able to use BMP.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	Thank you for your comment. See the Vegetation section of the Proposed Plan for management regarding use of chaining.
17573-92	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.7.3 Native plant species from locally adapted seed sources (page 2-27) The DWR procures seed through multiple avenues, including developed varieties and wildland-collected seed. We recommended that land management agencies support seed collection efforts to facilitate effective treatments. Responsible seed collection is not detrimental to native populations and provides the locally sourced seed required for successful restoration.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	See the Vegetation section of the Proposed Plan regarding seed collection. Private seed and plant collection would be allowed in accordance with applicable law.
17573-93	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	All alternatives should include coordination with the DWR, the WRI partnership, and the Great Basin Research Center (GBRC) as places to consult for expert knowledge regarding vegetation and habitat treatments.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	Text was added to the Vegetation section of the Proposed Plan to include coordination with UDWR and USFWS. Coordination with UDWR would encompass coordination with the WRI partnership and Great Basin Research Center.
17573-94	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	DWR recommends including language allowing the use of non-native seed where noxious or invasive species are present, or when native seed sources are not readily available or cost-prohibitive to use exclusively.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	Under the Proposed Plan, restoration would prioritize the use of native seeds based on availability, adaptation, and probability of success. Where probability of success or adapted seed availability is low, agencies would collaborate with the BEC to identify nonnative, non-GMO seeds that may be used to protect BENM objects.
17831-4	Christine Jauhola Glade Park, CO 81523	Great Old Broads for Wilderness, Grand Junction Broadband	A range of threats to vegetation and special status plant species, including habitat degradation from livestock grazing, trampling, unauthorized or cross-country OHV use, weed spread, droughts, and pinyon-juniper encroachment, may affect individual species in different ways. With little existing information on current trends, habitat conditions, and population size of most special status plant populations throughout the Monument, it is imperative to minimize damage to these populations while additional information is gathered.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	Implementation of management actions that may be authorized or carried out by the agencies to meet proposed management goals or authorize site-specific uses would require action-specific analysis of potential impacts on special status species. Based on these analyses, appropriate consultation with the USFWS on projects that may impact ESA-listed species would be conducted.
18330-1	Rose Chilcoat 2914 Junction St Durango, CO 81301		Vegetation treatments have got to stop! Destructive mechanical treatments replacing native plants with exotic pasture grasses have no place in a National Monument.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.

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3846-2	Jean Naple		To ensure the input from Indigenous tribal groups, I support Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management. To best protect sensitive resources and cultural sites, Alternative E should also be modified to prohibit mechanical treatments and commercial timber harvest and require the use of native seeds for revegetation and reclamation.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
9232-3	A Utah citizen conservationist		I support Alternative E's prohibition on chaining native vegetation. I request that the preferred alternative include a requirement to use only native plant species for restoration and post-fire seeding, as outlined in Alternative D. Pinyon-juniper habitats are valuable and should be retained. Many native species, such as Pinyon Jays, depend upon these habitats.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the terrestrial habitat and cultural resources sections for discussion of impacts to vegetation and cultural resources from vegetation management.
9255-16	Keith Alleman		page ES-13. paragraph ES-5.1.4 I think chaining is really poor vegetation management. I prefer Alternative C's restriction on it, and the general approaches in C, D, and E all seem acceptable subject to that proviso being included.	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	Under the Proposed Plan, chaining would not be allowed within the Monument and light-on-the-land techniques would be used where practicable.
9303-1	Nils Peterson 841 Travois Way Moscow, 83843		There is nothing more horrific than chaining native vegetation. That should not be considered because of its disturbance (intended) to native ecosystems and the resultant potential for ecosystem disturbance	ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	Under the Proposed Plan, chaining would not be allowed within the Monument and light-on-the-land techniques would be used where practicable.
8928-2	Donald Simonis		Grazing permit acreage should be further reduced because it has been our experience that Cattle have multiple adverse impacts on cultural resources, not just surface disturbance, erosion, trampling, and trailing as emphasized in the proposed plan. Cattle intentionally rub themselves against inanimate objects including the natural walls of rock shelters that have 2000 year old pictographs painted on them. Cattle typically weigh over 1000 lbs.	ALT07-Modification of Existing Alternatives, HIST001-General, GRAZ01-General	The Livestock Grazing and Cultural Resource sections in Chapter 2 include management actions to protect cultural resources. The Proposed Plan includes additional acres on BLM made unavailable to grazing or limited to trailing only than is currently grazed. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
17969-5	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Impacts to private lands within, or adjacent to, the BENM were not adequately considered in the Draft RMP/EIS and should be analyzed in greater detail in the Proposed RMP/EIS. Specifically, because TNCs Dugout Ranch is the largest private inholding within BENM, we are concerned that management of surrounding BENM lands will adversely impact our private property in the following ways (a partial list): increased visitation and recreation; development of associated facilities; human safety concerns because of increased visitation; unauthorized access to and across our property by visitors to the BENM; degradation of resources from increased use and recreation associated development of adjacent public land; increased risk of fire; and interferences to existing agricultural and research operations.	ALT07-Modification of Existing Alternatives, LAND01-General	The Proposed Plan considers actions on federal lands managed by the BLM and USDA Forest Service. The agencies would continue to work collaboratively with adjacent property owners to minimize trespassing on private property, maintain public health and safety, and avoid the degradation of natural resources. The impacts on these resources are analyzed in the RMP/EIS regardless of land ownership.
18965-19	Simone Griffin	BlueRibbon Coalition	There are many discrepancies in the lands managed by the USFS, BLM and the proposed Manti-La Sal National Forest LMP and the draft Bears Ears RMP. Roadless areas are proposed surrounding the Dark Canyon Wilderness. USFS should not be creating buffer zones to wilderness. Additionally within these areas exist motorized routes that access mining claims such as Black Bean Mine and Avalanche mine. There are many other mining claims within this area that have been utilized for decades. This does not meet roadless standards as there are drill holes, mine tunnels, muck dumps, etc. Mining claim owners on both BLM and USFS lands have been paying maintenance fees for years and the BLM needs to fulfill its multiple use mandate and not restrict these very critical resources to be mined.	ALT07-Modification of Existing Alternatives, LAND01-General	Designating "Inventoried Roadless Areas (IRA)" is outside the scope of this plan. IRAs are managed per the 2001 Roadless Rule. The IRAs were designated prior to the designation of BENM. Motorized access on NFS lands is consistent with the Motorized Vehicle Use Map, which is not being changed in the Proposed Plan. Travel management planning on NFS lands will be undertaken in a separate planning process. Access routes to legal mining claims by claimants are not affected by the MVUM and motorized access could be granted to those claims through the regular Plan of Operations process. See the Management Actions by Alternative Section of the Geology and Minerals section of the Proposed Plan for management actions regarding valid existing rights. Consistent with Proclamation 10285 the Proposed RMP provides the agencies with flexibility to allow for authorized administrative use of motorized vehicle in relationship to valid existing rights.
16784-29	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP states regarding Lands and Realty, Additionally, grants for ROWs contain stipulations that require grant holders to cease activities and report any paleontological resources that are discovered. Agencies would collaborate with the BEC on lands, realty, and cadastral actions. SVP suggests adding qualified paleontologists to the last sentence.	ALT07-Modification of Existing Alternatives, LAND01-General, PALEOGE003-Paleo	These discoveries would be reported to the agencies who would work with qualified agency paleontologists. The responsibility is on the federal agencies under PRPA.
17617-19	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	We believe grazing in LWC is inconsistent with conservation of wilderness characteristics. If LWC remain open to grazing, BLM should prohibit new range projects, vegetation manipulation, or motorized access for grazing.	ALT07-Modification of Existing Alternatives, LWC01-General	Grazing is allowed under BLM policy for lands with wilderness characteristics managed for those characteristics, including small facilities. Grazing is also allowed within BLM Wilderness and WSAs. See the Livestock Grazing section of the Proposed Plan. The Proposed Plan includes actions that only allow range improvements where those improvements would protect BENM objects.
17617-3	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	Alternative E proposes OHV limited use. We do not agree with Alternative E on this, and strongly support the Alternative C approach that closes LWCs to OHV. The use of OHV routes can impact an LWC areas apparent naturalness from route widening or braiding, vegetation loss, increased erosion, wildlife disturbances, degraded water quality, introduction of noxious weeds, and damage to cultural resources. Outstanding opportunities for solitude and primitive, unconfined recreation can be degraded by the noise and dust of motor vehicles and increased presence of other visitors.	ALT07-Modification of Existing Alternatives, LWC01-General	Thank you for your comment. See changes in the Land with Wilderness Characteristics and the Travel and Transportation Management section of the Proposed Plan.
18657-12	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	We also support limiting lands managed for protection of wilderness characteristics to those currently managed for that purpose and not expanding them. Existing decisions on lands with wilderness characteristics and BLM Natural Areas were made for a reason, and the reasons for those decisions are still applicable today. Most lands that previous management plans determined not to manage for wilderness characteristics are not roadless and are important for motorized and mechanized	ALT07-Modification of Existing Alternatives, LWC01-General	Alternative A makes no change to existing lands managed for protection of wilderness characteristics. This suggestion is within the range of alternatives analyzed in the RMP/EIS.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			recreation, dispersed camping, and other recreational activities incompatible with wilderness status. Increasing the amount of lands managed for wilderness characteristics as BLM Natural Areas will, with certainty, come at the expense of lost recreational opportunities and road closures, and should be avoided at all costs.		
18965-18	Simone Griffin	BlueRibbon Coalition	The proposed lands with wilderness characteristics and recommended wilderness should be disqualified as they all have had roads that accessed drill holes, mine tunnels, muck dumps and even mines themselves. None of the lands being proposed meet the requirements of Wilderness and therefore should not be managed as such.	ALT07-Modification of Existing Alternatives, LWC01-General	The lands with wilderness characteristics were inventoried by BLM interdisciplinary teams between 1999 and 2022. There is no recommended wilderness in the Proposed Plan.
9150-2	Paul King 2451 NW Broadway St Albany, OR 97321		In all of my years flying, I have never heard of anyone complaining about noise. Rather, when we meet other recreators, they are always enthralled and excited to see airplanes in the back country. Noise generated by departing airplanes is transient at worst and does not impact the ecosystem. To my knowledge there has been no studies that say otherwise.	ALT07-Modification of Existing Alternatives, NOISE01-General	Comment noted. While these noise-generating uses may be short-term in nature, they would affect soundscapes within BENM and are analyzed under the Visual Resource Management, Night Skies, and Soundscapes section of the Proposed Plan.
8677-10	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 3-17, paragraph 3: The BLM and USFS are required by federal law (PRPA) and regulations (43 CFR Part 49 and 36 CRF Part 291) to protect and preserve paleontological resources on all federal lands under their management. Because most scientifically significant fossils can only be preserved through permitted collection and curation, it is inconsistent with federal law and regulations to only allow permitted collection in certain areas of BENM with special designation. Permitted collection of fossils by qualified paleontologists should be allowed throughout all BENM unless they are intimately associated with archaeological resources.	ALT07-Modification of Existing Alternatives, PALEOGE001-General	Under the Paleontological Resources section of the Proposed Plan collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
8677-6	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 2-14, Table 2-3, row 4: Alternative A states Collection of paleontological objects would be by permit only, whereas all other alternatives (B-E) state See Section 2.4.2.1. Overarching Management. However, that section makes no mention of fossil collection or paleontological permitting. NHMU suggests all alternatives, including B, C, D, and E, should state Collection of paleontological objects would be by permit only.	ALT07-Modification of Existing Alternatives, PALEOGE001-General	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
8677-7	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 2-14, Table 2-3, row 2: Alternative E states Any work done involving fossils should not be extractive; fossil resources would not be extracted from BENM. This implies that no permitted fossil collection would be allowed in BENM. Such a policy would be inconsistent with the first sentence in this section which states Protect and preserve paleontological resources. As noted above, most scientifically significant fossils need to be collected and curated in an institutional repository to ensure their preservation. Forbidding permitted collection for the purposes of scientific research and preservation conflicts with multiple federal laws and regulations, including PRPA. 43 CFR Part 49 49.30 and 36 CFR Part 291 291.1 obligate the BLM and USFS to preserve, manage, and protect paleontological resources on and from Federal land using scientific principles and expertise, and to coordinate these activities with the scientific community. A core scientific principle in paleontology is the proper collection and curation of significant fossils. Furthermore, 43 CFR Part 49 49.120 and 36 CFR Part 291 291.13 state that permitted collection should be allowed when it furthers "paleontological knowledge, public education, or management of paleontological resources". Both Presidential Proclamations 9558 and 10285 emphasize the importance of paleontological research in BENM, and therefore permitted collection should be allowed because it is "consistent with the purpose and management objectives defined for the Federal land" as per those portions of the Code of Federal Regulations. Therefore, NHMU requests that this cell of the table be modified to state Protect, preserve, and manage paleontological resources. Restoration of paleontological resources should only be done in consultation with the BEC and qualified paleontologists, removing the sentence beginning with Any work done.	ALT07-Modification of Existing Alternatives, PALEOGE001-General	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The Paleontological Resources and Geology section in Chapter 3 discusses the impacts to the paleontological community.
8677-8	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 3-14, paragraph 4: It is important to emphasize that with most existing and future allowed ground disturbance activities (existing/future roads and trails, new ROW corridors, new visitor infrastructure, etc.), the only way to successfully mitigate the effect on scientifically significant paleontological resources is through collection and curation. Otherwise, fossils left in place will still be subject to continued weathering and crushing, breaking, or displacement" by visitor traffic. Thus, alternatives B, C, D, and E should be modified to allow permitted collection and curation of fossils.	ALT07-Modification of Existing Alternatives, PALEOGE001-General	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
17573-68	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State requests that any approved management plan include opportunities for permitted paleontological research and the excavations required for paleontological research, with the resulting fossils and field reports curated into approved repositories. Additionally, opportunities for paleontological educational outreach into all our communities including the various tribal nations within the Four-Corners region should be facilitated. The Analysis of the Management Situation (AMS) document (https://eplanning.blm.gov/eplanning-ui/project/2020347/510) indicates the original plan was to manage paleontological resources for their scientific and educational values, and not to preserve and protect by making them off limits to scientists and visitors alike. The State supports reasonable and necessary protection of these natural landscapes. The State does not support a complete prohibition of learning from the land as is proposed in the RMP/EIS. Paleontology is a gateway science for our youth so we should be taking advantage of this through outreach programs and the interpretation of geological and paleontological sites and exploring what they tell us about	ALT07-Modification of Existing Alternatives, PALEOGE002-Related to research communities, local communities, and visitor experience	Thank you for your comment. The Proposed Plan has been adjusted. See the Paleontological Resources Section of the Proposed Plan. The Proposed Plan allows for collection under certain stipulations. The Proposed Plan also has a paleontological resource implementation level plan which would include education and outreach to local communities and would be completed within 5 years.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			the deep-time history of these marvelous landscapes. Paleontological resources are a significant driver of tourism in southeastern Utah and there must be an avenue for continued scientific research and collection.		
9146-1	Robert Gay 614 N. 10th Pocatello, ID 83201		As an SVP member and an active researcher within the BENM boundaries, I am concerned about the RMPs' stance on fossil collecting, and would prefer to support any option that includes permitted fossil collection for scientific research, museum exhibition and public education and outreach.	ALT07-Modification of Existing Alternatives, PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The Proposed Plan also has a paleontological resource implementation level plan which would include education and outreach to local communities and would be completed within 5 years.
919-2	Cynthia Smith		I request that qualified researchers be allowed to collect fossils by permit and that those fossils be housed in an approved repository. This respects Indigenous needs and also allows for advancement of paleontology.	ALT07-Modification of Existing Alternatives, PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
17303-1	Patrick McShea 550 Repp Road NEW KENSINGTON, PA 15068		Bears Ears National Monument will be a greater public resource if fossil collecting, by a permit system, is allowed to continue. Although I have hiked in Bears Ears before, I have not collected fossils there. As a long-time educator at Carnegie Museum of Natural History (in Pittsburgh, PA), I have assisted paleontologists with fossil collecting in Pennsylvania, West Virginia, Wyoming, and Nevada. In every case the land was treated respectfully during fossil collecting, and the fossils themselves, when interpreted by scientists whose professional careers to devoted to their study, add a facet of deep time and dramatic change to the landscape. I respectfully hope fossil collecting, and fossil study will continue to add this unique interpretive layer of information to Bears Ears National Monument in the future.	ALT07-Modification of Existing Alternatives, PALEOGE003-Paleo	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
8593-1	Anonymous		As an SVP member, I am concerned about the Draft RMPs' stance on fossil collecting, and would prefer to support any option that includes permitted fossil collection for scientific research, museum exhibition, and public education and outreach. Permitted collection and curation by qualified professional paleontologists is the only way to ensure that fossil resources are preserved for scientific research and educational purposes. Surprisingly, despite its contributions to education and understanding past life and climate change, and despite existing federal guidelines for permitted fossil collection by professionals under NEPA & PRPA, only 'Option A' in the current list of proposed RMPs protects permitted paleontological collection.	ALT07-Modification of Existing Alternatives, PALEOGE003-Paleo	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The Proposed Plan also has a paleontological resource implementation level plan which would include education and outreach to local communities and would be completed within 5 years.
8677-21	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 3-14, section 3.4.1.2.2, paragraph 1: This statement suggests that under all proposed alternatives, "scientific work by qualified researchers ... would add further knowledge about the areas paleontological resources, resulting in opportunities for improved future management decisions and protection of these non-renewable resources and that Although specific goals, objectives, and management direction vary slightly between Alternative A and the action alternatives, many of the key elements are the same. These statements are incorrect. In most cases, protection, preservation and scientific research of paleontological resources is only possible through the permitted collection and curation of fossils. Whereas Alternative A allows permitted collection, alternatives B-E would severely restrict or forbid permitted collection of fossils in BENM. Thus, alternatives B-E as currently written would be a roadblock to further scientific work by qualified researchers, prevent further knowledge about the areas paleontological resources, impair future management decisions about these resources, and allow the deterioration and destruction of scientifically significant resources. NHMU suggests that if alternative B, C, D, or E is chosen as the BENM RMP, they must be modified to allow permitted collection of fossils by qualified paleontologists, with curation and preservation of collected fossils in federally approved, publicly accessible repositories.	ALT07-Modification of Existing Alternatives, PALEOGE003-Paleo	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
8732-10	Susan Markley PhD, FL		Paleontologists should, by permit, be able to collect and study paleo resources in order to understand them and protect objects and values in the Proclamation.	ALT07-Modification of Existing Alternatives, PALEOGE003-Paleo	Under the Paleontological Resources section of the Proposed Plan, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16988-4	Andy Blair 1690 East 2000 South Driggs, 83422	The National Outdoor Leadership School (NOLS)	Trail Management: In popular areas NOLS would support the designation of specific trails and camping areas to concentrate use and prevent the proliferation of informal paths and campsites, which can lead to habitat degradation and erosion. In remote areas, NOLS utilizes off-trail practices that reduce the impact caused by foot traffic (e.g., following existing trails, hiking on slickrock, through dry washes, stepping in each others footprints, etc.). We urge the planning team to continue to permit this type of travel.	ALT07-Modification of Existing Alternatives, REC01-General	Under no alternative is off-trail non-motorized travel prohibited.
10928-1	Susette DeCoster-Weisheit 120 Arbor Drive Moab, 84532		The Bears Ears Inter-Tribal Coalition: Collaborative Land Management Plan for the Bears Ears National Monument states, It is recommended that recreation should be restricted to designated areas and signs should be posted to keep people within those designated areas. Therefore, statements like designated routes would be re-evaluated through future implementation-level travel planning, and Dispersed camping may be closed seasonally or as impacts or environmental	ALT07-Modification of Existing Alternatives, REC01-General	In the Proposed Plan, the zones have been re-drawn in order to ensure maintained designated routes are within the Front Country, Passage, and Outback Zones which all allow for motorized use. Though recreation is managed differently under each alternative, all alternatives retain recreational access to the Monument. No alternative being considered in the Draft RMP/EIS restricts all recreation to designated

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			conditions warrant, leads me to believe that the alternative chosen is nothing more than a poorly vailed attempt to eventually block all recreation from remote areas of Bears Ears. As mentioned at the start of these comments, I have been exploring the canyons of Cedar Mesa, the forests of Elk Ridge, and the view-sheds of Canyon Rims, for more than 40 years. Ive spent wonderful weekends hiking and camping in these areas, every year. If the BLM wants the public to believe that areas we have come to know and love will remain available to us, then this plan should include the criteria land managers will use to restrict access. Because the way the plan reads, our ability to visit our public lands in our back yard are subject to the whims of land managers, and their stated desire is to restrict recreation to designated areas. This needs better clarification and involvement by the recreation community.		areas. Any necessary restrictions to recreation for the protection of BENM objects under implementation-level planning will be evaluated on a case-by-case basis through a public process.
13862-2	Matthew Riccardi		1. Permits and Fee: More information is needed regarding potential permits and fees for climbing activities. Clear guidelines will help the climbing community adhere to regulations while ensuring that the management practices are sustainable and beneficial for all stakeholders.	ALT07-Modification of Existing Alternatives, REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
14119-2	Jacques Hadler 125 E Center Moab, UT 84532	Grand County Commission	We recommend that the plan not be overly restrictive to activities that may include hiking, backpacking, photography, climbing, hunting, motorized recreation and biking and thus hope that regulations of such recreational opportunities not be unduly cumbersome while promoting responsible and sustainable practices. The Indian Creek climbing area is a unique, world-class resource that attracts enthusiasts worldwide and is cherished by many throughout the county. It is a strong component of local economies and is located near a major artery (SR 211), which minimizes backcountry impacts. There are well-organized local and national level advocacy groups that have been working for decades to mitigate climber impacts and disseminate information about how to climb, camp and recreate responsibly in this delicate environment. We strongly encourage collaboration with them to ensure continued sustainable use far into the future. We advocate that regulations on the replacement of existing climbing anchors, as well as on new ones, not be overly restrictive within the Indian Creek area.	ALT07-Modification of Existing Alternatives, REC01-General	The Recreation and Visitor Services section of the Proposed Plan include management actions including working with climbing organizations, Tribal Nations, and SRP holders to increase volunteer monitoring and to educate climbers about the cultural landscapes and cultural resources. Additionally, replacement of existing bolts, anchors, and fixed gear would be allowed on existing climbing and canyoneering routes, as needed for safety purposes, without prior authorization.
14265-3	Korina Rigglin		As has been show to be very successful in other areas, a Recreation Management Zone looks like this would work well for this area too. That would also include strong support for the preservation of the night sky.	ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan employs a zoned approach to recreation management.
14335-1	Madeline S		As a climber I support co-management with Tribal authorities of the Bears Ears National Monument, as well as need for an expedited anchor approval process to ensure that we are still able to establish new routes but they are in accordance with tribal and BLM practices.	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
14701-1	Lucas Barth		If the plan is to require a permit system for new fixed anchors for climbing then it should either be programmatic or resources need to be in place to quickly approve or deny these anchors, such as more employees such as climbing rangers that are trained and knowledgeable about these issues.	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input. The Proposed Plan adds a mechanism for anchors to be considered on a case-by-case basis until an implementation-level plan is completed.
15407-2	Danie Munger		I do however have concerns about the prohibition of new bolted climbing routes as I find that overly restrictive. Bolts are essential for developing safe and accessible climbing routes and preventing that will lead to unsafe practices. If small changes to this clause can be made I believe it would be an improvement	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
15439-16	Jason Keith Moab, UT 84532	Access Fund	Pets The Climbing Organizations support rules to prohibit pets in or at any alcoves, rock writing sites, or archaeological sites and that pets must not harass or harm wildlife, stock animals, visitors, or other visitors pets. We also support measures to prohibit pets from swimming in springs and potholes, and that pet waste disposal requirements should be identical to human waste disposal requirements. Under the draft RMPs Alternative E, pets must be leashed at all times (although elsewhere in the RMP the BLM says pets must be kept under control at all times). While the Climbing Organizations support stronger management rules for pets, keeping pets leashed at all times will be a significant change, difficult to enforce in both camping areas and at climbing cliffs, and perhaps unnecessary for the entire 1.36 million acres of BENM. Perhaps an under voice control standard could be a better initial policy for locations out of campgrounds or other high use areas, and incrementally plan for a stronger on leash at all times rule.	ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan defines areas that are not appropriate for off leash pets developed in consideration of potential impacts that could result from pet use, related to Visit with Respect practices, and where appropriate, manageability considerations.
15439-4	Jason Keith Moab, UT 84532	Access Fund	This RMP proposes several actions common to all alternatives, and the Climbing Organizations welcome guidance and recommendations from Tribal Nations for these common actions as well as in the development of subsequent implementation level plans tiered off this BENM RMP. However, each alternative in the draft plan lacks sufficient clarity regarding timelines and scope for the many needed implementation level plans for the many management initiatives contemplated for BENM such as for camping, climbing, permitting, access restrictions, and so forth.	ALT07-Modification of Existing Alternatives, REC01-General	The agencies have included timelines to prioritize the creation of implementation-level plans. Timing for remaining plans will be established during the implementation phase of those plans. For details on implementation, See Appendix T.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15439-7	Jason Keith Moab, UT 84532	Access Fund	Alternative E states that any new climbing routes that require the placement of bolts, anchors or fixed gear requires approval from the agencies, who would work collaboratively with the BEC to determine whether the route is appropriate to protect Monument objects, including cultural resources and wildlife, as informed by Traditional Indigenous Knowledge. The Climbing Organizations encourage the BLM to specify exactly how this process would workwhether through a recreation area management plan or other future implementation level plan that governs a new anchor authorization process, when the BLM will initiate/complete such a plan, and an indication of what timeline is envisioned for new anchor authorizations. The Climbing Organizations support programmatic anchor authorizations whenever possible and case-by-case authorizations for sensitive locations. Programmatic authorizations greatly reduce the administrative burden in the Agencies while maintaining appropriate recreational opportunities. Many new anchor placements require in-the-moment decisions because a climber (or canyoneer) wont know if they need an anchor until the reach a specific location where removable anchors are not available, which could be hundreds of feet up a cliff of miles down a canyon in the case of a rappelling anchor for canyoneers. On the other hand, if a climber anticipates needing new anchors in locations with identified cultural, natural, or social sensitivities then a specific authorization for that route proposal may be warranted. As BENM planners develop implementation level planning regarding new climbing anchor authorizations, we can provide detailed maps of BENM locations where we believe programmatic authorizations are appropriate. During this implementation level plan the Climbing Organizations can also provide several examples of effective and efficient permit processes that we have participated in over the last decades. We are concerned that if the BLM is contemplating an extensive and lengthy process for new anchor permits, then such a process will prove ineffective and become a de facto moratorium for new climbing routes until the process is complete and functioning, which could take several years (a typical planning timeline for federal climbing areas). Indeed, in the draft RMP the BLM anticipates that the extended collaborative process under Alternative E may limit the climbing potential of BENM for some users because of the additional review required for developing new climbing routes. Accordingly, we urge the BLM to develop an interim policy (prior to any implementation level plan governing new anchor permits) for new route proposals that benefit from BEC input and allow for appropriate climbing access and exploration at Indian Creek and throughout the BENM at locations that do not negatively impact monument objects or other sensitive resources. We recommend an interim process whereby the Monument Manager in collaboration with the BEC may authorize new climbing routes with fixed anchors consistent with the protection of monument objects, and ask the BLM to include in the final RMP a specific method by which climbers may submit a proposal for new fixed anchor placements. The Climbing Organizations stand ready to assist the BLM in developing such a process that may benefit from the many lessons learned on similar fixed anchor permit initiatives across the country, including on BLM lands.	ALTO7-Modification of Existing Alternatives, REC01-General	Suggestion for interim authorization has been incorporated into the Recreation and Visitor Services section of the Proposed Plan. Before the route approval process is established, routes will be reviewed on a case-by-case basis. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
15439-9	Jason Keith Moab, UT 84532	Access Fund	Under Alternative B, within 3 years, the BLM would develop, in collaboration with the BEC, an Indian Creek recreation area management plan (RAMP) to provide management direction for the area, including group size limits, facilities development, and designation of campsites. Until the RAMP is developed, existing group size camping limitations remain in place. Alternative E seems to provide for a RAMP (p. 2-155) that could address camping at Indian Creek, as well as the rest of the monument. Again, we encourage the BLM to consider a comprehensive RAMP for Indian Creek to plan for a range of management issues such as camping, group sizes, camping areas designations, trails, toilets, other infrastructure, and climbing management. Unless the Alternative E zone management plans would address camping and other management issues at Indian Creek, the Climbing Organizations would support this specific RAMP proposal from Alternative B. Under any alternative the Climbing Organizations support the development of the Shay Vista Campground, as authorized by the 2005 Indian Creek Corridor Plan and acknowledged in the 2018 Business Plan for BLM Monticello Field Office Campgrounds. This campground could provide much needed camping near Indian Creek climbing areas. The Climbing Organizations support the direction under Alternative E whereby the Agencies would inventory and monitor dispersed camping, prohibit dispersed camping within 0.25 mile of surface water (unless in an existing or designated campsite or area), and no dispersed camping within 0.25 mile of a developed campground. We also support the Agencies, working collaboratively with the BEC, designating campsites and areas to help guide and focus visitors to appropriate places, and to identify areas that are available to dispersed camping and areas that the BLM should close to dispersed camping, removing and reclaiming existing campsites and areas, as necessary, to protect monument objects. The Climbing Organizations request additional information regarding whether camping fees would be charged at areas not currently charging fees such as established campgrounds and how the Agencies would consider fees necessary to provide facilities and services. The Climbing Organizations look forward to working collaboratively with the BEC, BLM and other stakeholders to develop an implementation level camping plan, preferably as part of a larger RAMP for the Indian Creek area.	ALTO7-Modification of Existing Alternatives, REC01-General	The Proposed Plan would prioritize creation of a RAMP specific to the Indian Creek Management Area within 3 years of the signing of the final plan (See Appendix E). The climbing organizations would be able to participate in the process as part of public participation. The Front Country and Passage zones have been redrawn to more closely align to Highway corridors and byway corridors, and would allow for development of the Shay Visita and other campgrounds. Fees and permits would be addressed in implementation level plans such as RAMPs or Business Plans, which both involve public participation.

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15724-4	Rob Dillon, 84532		New fixed anchors should be allowed, without bureaucratic permission, in places that have not been specifically declared off-limits as cultural/archeological sites- and by this I do not mean "the entire landscape reserved by the Proclamation". BENM appropriately serves as a museum- a living one- of ancient habitations and artwork. It should not consist of a museum of existing rock climbs. The spirit of communion with nature celebrated by the past and present Tribes is not their exclusive property, and its benefits should not be denied to those few willing to embark upon uncertain journeys on the cliffs of Indian Creek. The monument is a world-class resource in more ways than one, and the occasional exploration upward acknowledges this fact. If a permit must be issued, a timely response is mandatory.	ALT07-Modification of Existing Alternatives, REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input. While called out as an important use, Proclamation 10285 specifies that recreation is not an object to be protected.
15724-5	Rob Dillon, 84532		Continue managing Indian Creek as an SRMA. We can continue to "meet resource protection and visitor safety objectives" without ignoring the significance of a place that has become famous the world over for qualities perhaps not unknown to the climbers of old.	ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities commensurate with the protection of BENM objects (see Appendix E for more details).
1689-4	Ralph Ferrara, UT		On page 3-429, Alternative E stipulates permits and fees plus user number limits across the entire monument and would control uses that damage monument objects. I disagree that a permit system for all private day and overnight use across the monument (I believe that in all canyons is an editing error) is a viable solution. If there are specific, highly sensitive archaeological or cultural sites that require limits on the number of visitors, this type of system for reservations and permits is a well-established practice across the federal public lands system and would be easily managed. A monument-wide permit system would be cumbersome, expensive, and needless. Alternative E also states areas would be closed to prevent recreation-caused damage (3-129) to vegetation, including from dispersed camping and off-trail hiking. This preventative approach is not only ill-defined, but it is also potentially arbitrary and controversial.	ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E.
16989-1	derek craig		Bolting permits requirements will amount to a bolting ban effectively. There isn't adequate staffing to manage permitting for bolting. There will be a back log of requests for permitting if this policy gets put in place. Much like the raptor closures are affective climbing bans for most of the year, a bolting permitting policy will effectively shut down all new bolting. The raptor closures have been a disaster for climbing in bears ears. many cliffs were shut down without evidence of raptors being on thos cliffs. there simply wasn't enough surveying of those cliffs. New bolting in bears ears isn't happening often and isn't a problem for conservation.	ALT07-Modification of Existing Alternatives, REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input. While called out as an important use, Proclamation 10285 specifies that recreation is not an object to be protected.
17358-7	Ramona Blaber Oak Park, IL	Sierra Club	As a relative local we have enjoyed bicycling in the area. Converting some of the two track to single track would certainly please us. E-bikes have become essentially electric motorcycles, not all, but my opinion is that anything past a class 1 e-bike is for motorized designated trails. Overall, I am of the thought that as long as there is any grazing, very damaging to these fragile soils, a token amount of bicycling is minor. This is big desert. Bicycles on designated paths are a great way to experience it while limiting ecosystem disruption. And of course, would love to see more indigenous folk on bikes exploring their backyard and benefiting physically and mentally.	ALT07-Modification of Existing Alternatives, REC01-General	Travel management planning and designations of trails will be done under implementation level planning. E-bikes will be considered in these plans.
17573-32	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	An additional lesson that the State has learned from other National Monuments, but the Agencies apparently have not, is the need to incorporate flexibility into the plan to manage the physical impacts of increased visitation on infrastructure. The State encourages the Agencies to review the decades of problems within GSENM when the need arises to repair or improve roads, install or replace culverts, etc. This became a major problem that caused serious public safety issues while the BLM navigated a restrictive Monument Management Plan. The State encourages the agencies to build that flexibility into this plan with all infrastructure, but most importantly roads and the areas around trailheads. For example, managing Lands with Wilderness Character (LWC) around a trail or trailhead will undoubtedly handicap the ability to increase parking or bathroom facilities at that trailhead. This is one example in hopes that the Agencies will consider this as they move forward with this plan.	ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan incorporates flexibility related to visitation, including but not limited to, the repair and improvement of roads. See the Travel and Transportation Management Section in Chapter 2, for the Proposed Plan changes for Recreation which incorporate management specifically for trailheads that are near the Remote Zones.
17617-14	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	Management zones have proven to be an effective tool for the BLM in managing Grand Staircase-Escalante National Monument by allowing for tailored conservation and usage strategies that balance preservation with public access. These zones enable the agencies to designate specific areas for different types of activities, such as scientific research, recreational use, and habitat protection. By clearly delineating areas with varying levels of protection and permitted activities, the agencies can more effectively mitigate human impact on sensitive ecosystems while still providing opportunities for education, recreation, and tourism. This zoning approach has facilitated better resource allocation, enhanced monitoring and enforcement capabilities, and improved stakeholder engagement, ensuring	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, the agencies use a zoned approach to define recreation management direction and inform management actions.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			that the monument's diverse landscapes and cultural resources are managed sustainably for future generations. We recommend replicating this success at Bears Ears.		
18113-1	Jerry DiMarco Bozeman, MT		When I read a statement like, premier rock climbing experiences, it suggests that the rules will be bent to accommodate that use. I suggest you drop that term from the RMP and focus on resource damage. Bolts, anchors, and other fixed gear should not be allowed, period. Not only do they damage the rock, they also damage the climbing experience, including the ability to learn good judgement and route finding skills. Any route that cannot be protected with removable gear should be top roped only. If a route cannot be climbed cleanly, it should not be allowed. Painting gear just introduces another non-natural substance into the environment.	ALT07-Modification of Existing Alternatives, REC01-General	The range of alternatives will continue to allow climbing activity and for safety reasons will allow the replacement of any fixed gear, bolts, or anchors on existing routes without prior approval.
18275-11	Jamie Ervin	Outdoor Alliance	Outdoor Alliance generally supports the framework for managing camping proposed under Alternative E, although we encourage the agencies and the BEC to ensure that the Final RMP allows for enough campsites to meet expected demand. we recommend that the agencies and the BEC also consider site-specific Recreation Area Management Plans to comprehensively plan for camping, group sizes, toilets, permits, and other recreation management issues.	ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities commensurate with the protection of BENM objects (see Appendix E for more details). Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Campsite demand will be considered in any analysis related to developing, closing, or rehabilitating campsites.
18275-3	Jamie Ervin	Outdoor Alliance	We seek additional clarity about how and when some of the potential closures described in the DEIS would be implemented. Examples include closures of areas to cross-country hiking, ¹¹ closures of dispersed campsites, ¹² closures to protect biological soil crusts, ¹³ and closures to protect big game habitat. ¹⁴ In each of these cases (and others), recreationists may support targeted closures to address clearly articulated resource concerns. However, the Final EIS should provide more information about the specific environmental or cultural impacts that might justify a closure, identify whether the closure might be established through specific implementation-level planning with opportunities for public input, and require that closure decisions adhere to the proposed sideboards for all closures listed above. One category of potential closure that merits particular explanation is the concept of resource rest, which is mentioned throughout the Draft RMP in the context of recreation and other uses of BENM, and is most extensive in Alternative E. Notable examples include seasonal closures of recreational facilities, ¹⁵ closures of recreation areas, ¹⁶ and closures of climbing routes. ¹⁷ The DEIS provides little detail about the timing, extent, and duration of these resource rest periods, which could be consequential for recreation access in BENM. Without more information, it is difficult for our community to understand how these rest periods might affect recreation and tourism throughout the Monument. We request that the Final RMP provide a clear process for determining resource rest periods that adheres to the proposed requirements for all closures noted above, including opportunities for public input to inform resource rest decisions. Finally, as a general matter, we request that the Final RMP make clear that agencies and BEC will consider whether natural resource and cultural impacts can be addressed through other management actions, such as restoration and rehabilitation projects and increased education of visitors, prior to instituting a closure. The outdoor recreation community, including Outdoor Alliance member organizations, would gladly contribute resources towards collaborating with the agencies and Tribal Nations to address environmental and cultural concerns related to recreation management.	ALT07-Modification of Existing Alternatives, REC01-General	Resource rest would be implemented in coordination with the BEC. Various options for resource rest and closures would be analyzed as a part of implementation level planning. Under the Proposed Plan, the need for seasonal closures would be determined in collaboration with the BEC, and these closures may relate to the protection of any BENM objects. The Recreation Use and Visitor Services section under Management Actions Common to All Alternatives of the Proposed Plan provides some additional information these closures. Closures are discussed in the analysis in Appendix N.
18295-1	Kira Ratcliffe		However, I have some concerns about the potential impacts on recreation, specifically climbing. In reviewing the draft management plan this past spring, it struck me as incredibly vague. It seems, that it could allow for extreme restrictions on climbing and other forms of recreation in the future. I would like to see protections for recreation, specifically climbing as a protected, appropriate form of recreation in the monument. Additionally, I think this plan should outline clear criteria that will be used to determine when and if closures and restrictions are needed. For example, I understand and support routes being closed near culturally significant resources. However, what does this mean? If there is a petroglyph panel, will only the routes that climb directly through it be closed? A 20ft buffer zone? The whole crag? I think there should also be clear criteria for the implementation of day use permits. I would like to see the management plan outline the expectations for and limitations on this. Answering questions like: will they always be free? Will there be quotas imposed? Will it be online or in person? (I would recommend free and available in person.) While I am excited to see provisions allowing for rebolting existing anchors and continued route development, I would like to see the process for route development more clearly laid out. There should be clear criteria established for what constitutes an appropriate new route. I think there should also be expectations laid out for a maximum timeline one would have to wait for approval.	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, the need for seasonal closures would be determined in collaboration with the BEC, and these closures may relate to the protection of any BENM objects. The Recreation Use and Visitor Services under Management Actions Common to All Alternatives of the Proposed Plan provides some additional information these closures. Closures are discussed in the analysis in Appendix N. Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.

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18295-3	Kira Ratcliffe		I would also like to see protections for climbers trails, specifically in the Indian Creek zone. While the climbing continues to be allowed under the preferred alternative, my understanding is that these trails could be closed since they are not officially designated. I think this plan should outline criteria to protect the continued use of professionally built, highly utilized approach trails to popular climbing areas.	ALT07-Modification of Existing Alternatives, REC01-General	Existing access points, trails, and climbing routes that are consistent with the protection of BENM objects would remain available for use. If site-specific impacts exist, climbing routes can be closed and access trails and staging areas may be closed or rerouted. Any closures would be identified in collaboration with the BEC and Tribal Nations. Climbing closures would be identified in accordance with applicable law. See Management Actions Common to All Alternatives in the Recreation and Visitor Services section in Chapter 2 of the Draft RMP/EIS.
18708-3	Heidi Blankenship Blanding, UT 84511		I strongly support the elimination of pets from all canyons on Cedar Mesa where they are currently restricted and in all those where they are currently allowed (Road, Lime, North and South Mule), especially in Fish and Owl Canyons where the perennial water sources are vital to wildlife.	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, pets would be leashed at all times, would be prohibited from swimming in springs, potholes, or other natural water sources, and would not be allowed in the Cedar Mesa Canyons Sub-Area, Doll House, and additional sites designated by the agencies, in collaboration with the BEC (Recreation and Visitor Services section, Chapter 2).
18852-2	Lucia Christensen 2828 Silverplume Dr, #U4 Fort Collins, CO 80526		"Any new climbing routes that require the placement of bolts, anchors or fixed gear requires approval from the agencies, who would work collaboratively with the BEC..." While climbers appreciate that climbing is recognized as a valid use of land, the onerous anchor approval process could shut down new route development entirely in the Indian Creek area. Most climbers will seldom stray away from already developed routes. However, there is still vast potential for more routes throughout the Indian Creek area. Unfortunately, Alternative Es process will effectively prohibit new routes. Cultural resources must be protected, but it is imperative to identify these resources and mark them off for prohibited access. This would help protect resources that have already been impacted by bad bolting, in addition to protecting from future damage. A bolting ban would not necessarily protect resources from damage, and would hinder recreation in the area. If this comes to fruition, it is crucial that the permitting process have a timeline attached to it (I would suggest 30 days).	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
18852-4	Lucia Christensen 2828 Silverplume Dr, #U4 Fort Collins, CO 80526		Page 2-102 states that: "Permits would be required for private overnight and day use in all canyons. My questions: is the Indian Creek zone considered a canyon? Given the large land size and variety of uses of the Indian Creek zone, I would not support the need for day use permits. However, if it is to be done, I would suggest self-issued, paper permits at trailheads (given the remote nature of the trailheads, lack of cell phone service and potential burden of electronic kiosks). Permitting should NOT be done via recreation.gov because there is no Internet or cell service in the are and the fees are burdensome to the average user. There is so much variety for climbing, hiking and seeing in this zone that requiring people to advance-issue permits would kill the spirit of recreation within the canyon.	ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E.
5740-6	Roger Jenkins 588 Evening Star Ln, Bozeman, MT 59715 BOZEMAN, 59715		In several places in the Volume 2 document, it appears that Point Lookout canyon is not considered a management zone along with Slickhorn Canyon (Eg. Figure 2-31 Alt-D)). I was surprised to see this, because the Slickhorn/Point Lookout loop backpack is a great week long loop backpack. It is hard to find loop trips in canyon country. See: Slickhorn Pt Lookout Backpack 2010 - Roger Jenkins/Susie McDonald (smugmug.com) I would strongly recommend that this canyon be included in the Slickhorn Canyon complex It was not clear from some of the maps that dealt with Mancos Mesa actually included the watershed for Moqui Canyon. Again, the Moqui Canyon/North Gulch loop is a great week long backpacking trip. See: Moqui Canyon 2002 (twohikers.org)	ALT07-Modification of Existing Alternatives, REC01-General	Point Lookout Canyon is not included in a Sub-Area in the Proposed Plan. Please see the interactive map available on planning, which allows for comparison of data at a fine scale. If this change is needed in the future, agencies could analyze further and consider adding to the Cedar Mesa permit system.
59-1	Heidi Wainer		If the BLM wants the public to believe that areas we have come to know and love will remain available to us, then this plan should include the criteria land managers will use to restrict access.	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, the need for seasonal closures would be determined in collaboration with the BEC, and these closures may relate to the protection of any BENM objects. The Recreation Use and Visitor Services section under Management Actions Common to All Alternatives of the Proposed Plan provides some additional information these closures. Closures are discussed in the analysis in Appendix N.
8305-12	Tracy Bodnar		Install Cultural Resource etiquette signs at trail heads so inexperienced hikers understand the fragile nature of cultural sites and natural features like soil crusts and avoid harming them.	ALT07-Modification of Existing Alternatives, REC01-General	The agencies have installed numerous signs and informational kiosks at trailheads with information on "Leave No Trace" ethics and how to "Visit with Respect". The Plan allows and directs this type of education to continue
8426-1	Sam R.		The definition of wilderness as stated in the Wilderness act includes the following quote: "[...], generally appears to have been affected primarily by forces of nature, with the imprint of man's work substantially unnoticeable". This quote indicates that the presence of established campsites goes directly against the idea of wilderness. To combat this I suggest making established campsites for backpackers to use along routes, as well as prohibiting the creation of new campsites in other places along the route. This will make it so that the imprints of man are concentrated to specific areas, preserving the overall state of the wilderness area. In combination with this I would suggest By doing those two things the human impact on the area will be concentrated and minimalized to the point that the environment affected will be able to recover. To implant these two things I suggest a clause to be added containing the two changes to management to either management plan D or E. For plan D it could be added easily due to the preservationist nature of the plan, allowing for use of the area to be more limited and for there to be more focus on sustainably recreating within the Dark Canyon Wilderness and allowing for the environment to be affected by humans as little as possible. For Plan E it could be added well because traditional ecological knowledge can be incorporated when trying to maintain as little human effect on the area as possible and while these would be closures due to indigenous ceremonies that could help to reduce the use on heavily treaded areas. The idea behind implementing the suggested clause into either management plan would be to limit or at least	ALT07-Modification of Existing Alternatives, REC01-General	The only area in BENM currently managed under the Wilderness Act is the designated Dark Canyon Wilderness. The Proposed Plan allows for the campsites to be designated in the Dark Canyon Wilderness if impacts to wilderness character are occurring. How the designation of the campsites could be done either via maps, GPS, or physically on the ground with a marker, is not addressed in this RMP and would be undertaken if impacts are determined and an action to designate campsites is needed. That action would be undertaken in consultation with the BEC to integrate Traditional Indigenous Knowledge into the decision.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			regulate the recreational use on the wilderness area while maintaining specific ways that the area can be used specifically by backpackers.		
8648-1	Jon Burgess		My comment concerns the potential discontinuation of geocaching within the BENM. Under Alternative E, the preferred alternative, geocaching would be considered an inappropriate activity based on Tribal expertise and Traditional Indigenous Knowledge along with various activities that generally involve a parachute. These activities are wildly different and I was unable to find any additional reasoning, within any of the publicly released documents, on how Tribal leaders reached their conclusion on geocaching. I wish to provide information, possibly new, and propose a reasonable alternative to the current draft statement. Geocaching, a GPS enabled activity, can be broadly categorized into two groups. One group incorporates a physical component, typically some sort of container containing a log to sign, left by one geocacher for others to locate. With the second group though, no physical container is left behind. Geocachers are still brought to a specific location, but once on site, requires some type of observation and the sending of these observations to the cache creator on-line. I concede that caches with a physical component come with some concerns, leading them to be less desired by Tribal leaders. Physical containers can potentially place stress on the land or wildlife as well as damage sensitive cultural sites. The second group though can be developed in various ways to mitigate these concerns as well as to educate the public in a variety of ways. Of course, these concerns are not unique to the BENM area. Within Utah, every National Park allows geocaching, but prohibits caches with a physical container. My research further indicates that, within the overall National Park system, placing non-physical geocaches is generally permitted in coordination with and only upon local manager approval. Placing physical caches though is extraordinarily rare. My recommendation is to slightly modify Alternative E (page 2-115) to read, Prohibited activities include, but are not limited to, paragliding, hang gliding, base jumping, wing suit flying, placing or finding geocaches with a physical container, and rock stacking. This would seem to be a reasonable alternative allowing for visitors to recreate in a variety of ways, but in a manner that supports the environment and is more in line with Tribal values and knowledge. Placing non-physical geocaches via this course of action could be easily implemented and managed through a cache permit application process through BLM or another centralized entity. Caches could be restricted to those on existing road and trails to minimize the environmental and cultural impact. This would be consistent with the Recreation and Tourism portion of Part D: Threats and Impacts to the Landscape of the Bears Ears Inter-Tribal Coalition plan for the BENM, recreation should be restricted to designated areas If desired, caches could also be developed that highlight areas of cultural interest that Tribes wish to educate others on. In short, the goals and values of geocaching are not necessarily in direct violation of Tribal goals and values. The right type of cache can support Tribal goals to protect the Monument and the BLM/USDA Forest Service mission while simultaneously allowing geocachers to recreate.	ALT07-Modification of Existing Alternatives, REC01-General	Geocaching is a prohibited activity under Alternative E and the Proposed Plan as described in the Recreation and Visitor Services section of Chapter 2.
889-6	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We urge the agencies to continue allowing the recreational use of drones throughout the monument. Drone photography is an important form of First Amendment protected expression, and is an increasingly popular way of capturing the beauty of southern Utah. At the very least, drones must continue to be allowed anywhere there are roads open to motorized vehicles, as anything else would be nonsensical and inconsistent management that the public is unlikely to comply with. Any restrictions on drones should have a rational basis and should be consistent with general BLM and Forest Service Policy.	ALT07-Modification of Existing Alternatives, REC01-General	Drone use in airspace is managed by the Federal Aviation Administration Civil Operations Part 107. However, the agencies have the authority to manage the casual use landing or taking off of drones on BLM-administered and NFS lands. Additionally, the agencies have the discretion to dictate all aspects of drone use if that drone is being used as part of a permitted activity. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion. Restrictions of drone use in the Proposed Plan for the purpose of protecting BENM objects is consistent with applicable law.
889-69	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We are also concerned by provisions in alternative E requiring permits for essentially all day and overnight use in the monument. While such permits could be only a minimal burden on monument visitors if they are unlimited and easy to obtain online, we strongly oppose establishing any kind of cap on the number of permits to limit visitation, lottery systems, or excessive fees for permits beyond a nominal fee to cover administrative costs.	ALT07-Modification of Existing Alternatives, REC01-General	Under the Proposed Plan, there is no language requiring permits for use of the entire Monument, or of all canyons. Please see Appendix E for details regarding permits in future implementation level plans for specific Management Areas and Sub-Areas
889-79	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Any impact from drone noise on other monument visitors ultimately amounts to nothing more than a minor annoyance. We are generally opposed to one activity being excluded from public lands based on subjective preferences and ideologies under the guise of user conflict (see the preceding section of these comments). The Bears Ears monument belongs to all Americans, and that land should be shared by all users rather than favoring specific activities over others. The agencies should not be in the business of banning certain activities on public lands simply because others may find them annoying. Those who find the prospect of a drone disturbing their visit to the monument intolerable are welcome to hike in one of the many designated Wilderness areas in the region, where drones are and always will be categorically forbidden. In other areas, the agencies should consider not only impacts on the recreational experience of those who dislike drones, but should also consider how the experience of drone enthusiasts will be diminished if they are not allowed to fly and capture footage of many of the most scenic areas in the monument.	ALT07-Modification of Existing Alternatives, REC01-General	See the Natural Soundscapes affected environment section in Appendix N of the RMP/EIS for an analysis of the impacts of drone use on natural soundscapes and rationale for limitations on drone use.
889-87	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	It is clear that the Bears Ears National Monument does not need to incorporate express language regarding drones in its Management Plan in order to regulate them by administrative orders or location specific management plans. However, if the agencies believe such language is needed, a general grant of such authority should be sufficient, without the need for the detailed restrictions	ALT07-Modification of Existing Alternatives, REC01-General	Administrative uses are still allowed in the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			contained in the current proposed standard. In that case, we recommend something along the lines of the following language: When deemed necessary for purposes of wildlife or resource protection, or to resolve unacceptable conflicts of use, the Moment Supervisor may restrict or prohibit the recreational operation of UAS in specific locations.		
889-91	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Such visitors will not see any reason why they should not be allowed to fly a drone from the same roads on which they can drive a motor vehicle, and will be unlikely to abide by any restrictions on drone flying assuming they are even aware of them. People tend to obey rules that make sense and are consistently applied, while they tend to ignore rules that seem arbitrary and irrational. This rule is a prime example of the latter. Most consumer quadcopters are largely inaudible once they are a couple hundred feet up and a few hundred feet away laterally. ATVs and dirt bikes, in contrast, can often be heard for miles. To ban drones from being operated from motorized roads and trails because of noise concerns is the height of inconsistency, as it arbitrarily singles out one kind of motorized device for unequal prohibition--and the least noisy one at that. Anyone on or near a motorized route should expect to encounter noise from motorized devices, so noise from drones is not a valid reason to prohibit them from being operated where other motor vehicles are allowed. Where motorized travel is allowed, drones should also be allowed.	ALT07-Modification of Existing Alternatives, REC01-General	See the Natural Soundscapes affected environment section in Appendix N of the RMP/EIS for an analysis of the impacts of drone use on natural soundscapes and rationale for limitations on drone use.
889-92	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Overall, we simply do not believe additional restrictions on launching and landing drones are necessary beyond those already established in the 2020 management plans, and perhaps the prohibition on flying within 300 feet of developed recreation sites in alternative B. Beyond that, additional restrictions on drones simply arent warranted. The total prohibition on drone flying across the entire monument in alternatives C, D, and E is completely unjustified by any actual environmental effect that could be documented scientifically, and appears to be largely motivated by native American religious beliefs in violation of the First Amendment. 72 We urge the agencies to adopt an alternative which maintains the status quo and continues to allow drone flying in all areas of the monument except those specific areas where launching and landing drones is prohibited in the 2020 management plans. At the very least, the final management plan should allow drones to be flown anywhere that motorized vehicles are allowed.	ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan is consistent with applicable laws and regulations. Drone use in airspace is managed by the Federal Aviation Administration. However, the agencies have the authority to manage the casual use landing or taking off of drones on BLM- and USDA Forest Service-administered lands. Additionally, the agencies have the discretion to dictate all aspects of drone use if that drone is being used as part of a permitted activity. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion. The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft, including drones, are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3
8928-4	Donald Simonis		Under all alternatives, ropes and climbing aids will not be allowed for use to access archaeological sites and cultural resource except for Tribal, scientific, administrative, or emergency use. This has been the case for decades. Clarification is needed in this restriction. Even using terms like direct access doesnt give direction to the public about how far away from a site or resource do you have to be before you can use ropes and climbing aids.	ALT07-Modification of Existing Alternatives, REC01-General	The statement that ropes and climbing aids may not be used for the purpose of accessing cultural sites found in the Management Actions by Alternative section in the Recreation and Visitor Services section of Chapter 2 states that any use of these devices to access cultural sites is not permitted, regardless of proximity, to prevent access to sites that have been protected by their inaccessibility. A corresponding statement in in the same section allows BLM to close existing climbing routes if they impact cultural resources, and also requires that all new climbing routes go through an approval process.
9097-3	Robin Benallie		I'm against 100s of 4wheeling vehicles all over. How about letting them in by permit or 5-10 at a time, or how about tours! Let a local or a Native give tours. That is what they do at Havasupai. The Natives guide the people in a few at a time so its not a mess. That is what they do at Arches now too! Then the guide can give people information and watch for any destruction.	ALT07-Modification of Existing Alternatives, REC01-General	The Draft RMP/EIS considers various means to manage and mitigate the impacts of dispersed camping See Alternative E, Recreation. Under no alternatives would there be OHV-open areas on BENM, meaning there can be no off-trail travel. Such management would limit OHV use impacts to natural and cultural resources. The geography and access of BENM, including the access provided to the 1.3 million acres of public lands by multiple US and State of Utah paved highways within the Monument, makes a limitation of the type suggested by the commenter impractical and outside of the legal discretion of the agencies.
18990-11	Clif Koontz		Just monument objects aren't protected by excessive restrictions to recreation, excessive restrictions to management are also detrimental. Management often requires negative impacts upfront to reduce negative impacts in the long term, such as mechanical treatments as a key tool for forest health, and the same is true of recreation. Much of the DRMP/EIS (especially the preferred alternative) would only make it harder for the Lead Agencies to effectively manage visitation. By the same token, it's important to place certain guardrails on management in terms of the range of actions and the process of future planning. While the DRMP/EIS (especially the preferred alternative) isn't sufficiently flexible for things like travel management, it's too vague when it comes to concepts like a cultural landscape or processes like leaving many decisions to the co-stewardship of the Lead Agencies and BEC without clear opportunities for public review and participation.	ALT07-Modification of Existing Alternatives, REC01-General, CUL01-General	See the Proposed Plan changes under the Recreation and Visitor Services section and the Travel and Transportation Management sections in the Chapter 2. The sections have clarified the objectives for Zones.
8999-17		International Mountain Bicycling Association	Developing more of these recreation opportunities could support a tourism industry in the communities surrounding BENM and also could aid in support of Utahs thriving outdoor recreation economy, which produced \$8.1 billion in economic output and supported more than 71,000 jobs in 2022.	ALT07-Modification of Existing Alternatives, REC01-General, EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities commensurate with the protection of BENM objects (see Appendix E for more details). The agencies have identified Alternative E as the preferred alternative because it would emphasize Traditional Indigenous Knowledge and a holistic approach to stewardship of this sacred landscape that addresses tangible and intangible aspects of the Monument. Alternative E also incorporates both the

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					Western science perspective and the cyclical nature of management including Indigenous circular ways of knowing and seasonality, as well as recognizes spiritual, cultural, and ancestral connections to the landscape and protects Indigenous traditional uses of the Monument. Recreation, although recognized as an important use of the landscape, is specifically excluded from consideration as a BENM object by Proclamation 10285. Management actions under each of the zones take into account the recreational resources contained within those zones. Impacts on economic conditions from changes in recreation, including travel and transportation management, are discussed in the environmental consequences section in the Recreation Use and Visitor Services section in Chapter 3, as well as the sections for impacts under each alternative.
8999-20		International Mountain Bicycling Association	We fully agree that recreation is a primary use of the lands and the Proclamations recognition that recreation and mountain biking specifically are important parts of the economy and quality of life for local residents and visitors to the area. This demonstrates the need for the use to be better integrated into the BENM. Yet in the DRMP, it is not. IMBA supports the current and future policy of limiting bicycles to designated routes but without designated routes available this is an issue. But there needs to be a system of designated routes for this to be an effective and worthy policy.	ALT07-Modification of Existing Alternatives, REC01-General, TRAVEL01-General	Proclamation 10285 specifically excludes recreation as a Monument object to be protected, while still naming the world class outdoor recreation opportunities, including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. It also notes the importance of these recreational activities on the regional economy. As such, the agencies sought to develop alternatives that would provide for appropriate recreational opportunities commensurate with protecting BENM objects. The BLM and USDA Forest Service will develop implementation-level travel management plans that will be guided by the landscape-scale management direction provided in the RMP/EIS. The implementation-level travel management plan will assess existing motorized/mechanized trails and routes, as well as future needs and opportunities.
981-1	John Mawhinney 3210 Chicago St San Diego, CA 92117		Preserving wilderness areas is not in conflict with backcountry airstrip use. As a whole, general aviation backcountry pilots are the most wilderness respecting people Ive ever experienced. Pack it in/pack it out, leave no trace, and a very light environmental impact from general aviation aircraft. Arbitrarily closing airstrips without evaluating the merits for each is government overreach, will have a huge negative impact to recreational opportunities for many people, and is antithetical to the stated purpose of National Monument designation. Please reconsider your proposal to close the backcountry airports in Bears Ears National Monument.	ALT07-Modification of Existing Alternatives, REC01-General, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
18556-5	Stan		The number of visitors to Moon House is currently limited by permit, and therefore the impact is also limited. The BLM should reduce the number of permits (e.g. by half) before considering a total closure of inner Moon House. This site is a national treasure that I want my grandchildren to have the opportunity to visit. Cultural sites on public land belong to all members of the public, not just tribes, and inner Moon House should remain open to the public. The BLM needs to be more transparent in the management plan about what issues they are trying to solve by restricting access to inner Moon House, and they should consider other alternatives first before closure.	ALT07-Modification of Existing Alternatives, REC02-Visitation and Visitor Experience	Although inadvertent, impacts from visitation do occur every time a visitor enters the interior corridors of Moon House, the Cultural Resources section in Chapter 3 has been updated for impacts to Moon House and cultural resources generally. Additionally, Moon House, while an important recreation destination for visitors, is not the most visited or most popular archaeological site in BENM. Visitation to Moon house will still occur under the Proposed Plan under an allocated permit system, like current management, but access to the interior corridor will be prohibited. This was analyzed in the management plan, along with other alternatives that continued access to the interior corridor. This action will help preserve the site for future generations
15265-1	Sally Whitehead		Keeping the Kane station open benefits the area as more and more people visit. Education is key and information cant all be decimated in Bluff	ALT07-Modification of Existing Alternatives, REC02-Visitation and Visitor Experience	The Kane Gulch Ranger Station is considered for development or improvement under the Proposed Plan.
15724-2	Rob Dillon, 84532		Permits should be free and self-issued at trailheads and camping areas. They will educate and provide user data, but they must not represent a significant obstacle- financial, temporal, or otherwise. The growing exclusion of citizens from public lands by financial means is antidemocratic and antithetical to 'the use and enjoyment of present and future generations', which phrase I hope rings a bell.	ALT07-Modification of Existing Alternatives, REC02-Visitation and Visitor Experience	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
1660-2	Robin Benallie 387 N 300 W Blanding, UT 84511		I do have some solutions (ideas) that you could and should consider... 1. Since we don't want our area run over with tourists, why don't we make a plan to keep them at bay and not have the crowded influx (like Moab) by restricting access to 100's of 4 wheelers, jeeps and bikers coming into our area. I know they want to see and enjoy our area (especially since it has become a Monument) but let us have restrictions on them! A) Have tourists get permits to come into the Bears Ears area B) Let the locals/Natives be trained guides to teach the people who come in to respect the sacredness of our land. (Havasupi does this) 1) Let only a certain number of tourists come in and with a Guide. 2) Letting huge groups of people come in, tear up the area and cannot be controlled 2) Let tourist only come in at certain times of the year (so many people come in the winter and get stuck!)	ALT07-Modification of Existing Alternatives, REC02-Visitation and Visitor Experience	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under all action alternatives, the agencies would "collaborate with the BEC for the development of a cultural ranger program that emphasizes a Traditional Indigenous Knowledge approach to the cultural landscape. This program would be open to Tribal members and would support site monitoring and training of site stewards" (Management Actions Common to All Action Alternatives in the Cross-Cultural Education and Outreach section in Chapter 2).Additionally, under all action alternatives, agencies would "collaborate with the BEC on lands and realty actions, including seasonality and resource rest." (Management Actions Common to All Action Alternatives in the Lands and Realty section in Chapter 2).
16988-2	Andy Blair 1690 East 2000 South Driggs, 83422	The National Outdoor Leadership School (NOLS)	Sustainable Access: Maintain the current permit system to manage the number of visitors and reduce the impact on sensitive areas such as the current Cedar Mesa Special Recreation Management Area (SRMA). Maintain the current permit system with respect to visitation in the White Canyon SRMA, Cheesebox Canyon Wilderness Study Area (WSA), Mancos Mesa WSA, the Dark Canyon WSA, Dark Canyon Wilderness Area, and along the San Juan River corridor	ALT07-Modification of Existing Alternatives, REC02-Visitation and Visitor Experience	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					While private group size thresholds are identified in the Proposed Plan for Management Zones, larger group sizes may be considered under an SRP.
18330-12	Rose Chilcoat 2914 Junction St Durango, CO 81301		Recreation is an important part of how people enjoy Bears Ears but it must be managed and not a free for all. A zoned approach to management similar to that done in Grand-Staircase Escalante NM would work well. It would help concentrate visitors and recreation infrastructure in areas that can sustain those uses and ensure protection of monument resources.	ALT07-Modification of Existing Alternatives, REC02-Visitation and Visitor Experience	The Proposed Plan employs a zoned approach to recreation management.
18708-5	Heidi Blankenship Blanding, UT 84511		Managing the number of people allowed in an area by zone with respect to the total population of people in that zone, and with the water resources of wildlife in mind, is preferable to sustaining the current level of visitation by trailhead.	ALT07-Modification of Existing Alternatives, REC02-Visitation and Visitor Experience	The Proposed Plan has group size thresholds for each Zone. Specific use allocations, including deciding how to subdivide the area, would be developed in Implementation Level Plans.
8999-8		International Mountain Bicycling Association	Defined Routes: Trails establish clearly marked paths that guide people through ecologically sensitive areas, ensuring that visitors stay on designated routes. Trails can discourage people from wandering off and potentially damaging fragile ecosystems or disturbing wildlife habitats.	ALT07-Modification of Existing Alternatives, REC02-Visitation and Visitor Experience, WILDFISH01-General	See the Travel and Transportation Management section of the Proposed Plan. The public would be encouraged to stay on designated or existing trails when hiking in BENM. The development and designation of hiking paths and trails would be allowed if consistent with the protection of BENM objects.
11236-2	Lloyd Nielson 140 N 100 W Blanding, UT 84511		In 2010, there was a BLM study to support lawsuits to close Arch Canyon. This study was also used in 2017; it stated that vehicles going up Arch Canyon were not doing any significant damage to the waterway or the Arch sites. I would like to see a study done on the effects of camping that will surely be increased in this canyon: litter, human waste, dog waste, etc., since we cant expect people to hike 15 miles in and back out of Arch Canyon. This will cause an increase in camping up in the canyon.	ALT07-Modification of Existing Alternatives, REC03-Dispersed Recreation (where there are no formal recreational facilities)	In the Proposed Plan, the Arch Canyon Sub-Area is OHV limited. If necessary, the Proposed Plan allows the BLM to add pedestrian and equestrian use in Arch Canyon to the Cedar Mesa permit system to address the impacts that the commenter refers to.
1659-1	Eve Tallman, UT		Dispersed camping in Indian Creek and Valley of the Gods is not addressed adequately in the proposed alternatives. I believe that baseline and follow-up studies (Rachel Nelson et al) already completed regarding impacts of dispersed camping in Indian Creek should be used or adapted to determine designated dispersed sites in the future. Similar studies are overdue in Valley of the Gods. Vault toilets and designated dispersed sites are urgently needed and any Alternatives that do not consider mitigation of dispersed camping impacts in the short term should be revised. In addition, I believe the Alternative E Zone Map should reconfigure the Front Country area in Indian Creek to expand opportunities for future developed campgrounds to alleviate the burden of visitors and dispersed campers. Specifically, the area previously designated for the future Shay Mountain Vista Campground (Alternative A, page 2-84) should be redefined as Front Country to allow for the eventual construction of this much-needed campground. It is in an old gravel pit area adjacent to the highway and does not have wilderness characteristics that define the Remote area as proposed. The future Shay Mountain Vista Campground is also mentioned in Alternatives A & B, on pages 2-108 and 2-109. I believe this proposed campground should be included in all Alternatives.	ALT07-Modification of Existing Alternatives, REC03-Dispersed Recreation (where there are no formal recreational facilities)	Comment has been incorporated into the Proposed Plan, in that the potential location of the Shay Mountain Vista campground is within the Front Country Zone. Existing dispersed and backcountry campsite inventories, including those done by partner organizations and agency staff at Indian Creek, Butler Wash, Valley of the Gods, Grand Gulch, Dark Canyon, and other locations will be considered considering alternatives for dispersed camping within implementation level RAMPs.
17263-1	Chris Schulte		Keep off trail foot travel open, the ability to walk carefully and to explore is core to the appreciation of the area.	ALT07-Modification of Existing Alternatives, REC03-Dispersed Recreation (where there are no formal recreational facilities)	The Proposed Plan does not prohibit off trail hiking anywhere in the entire Monument. See the Travel and Transportation Management section of the Proposed Plan. Visitors are encouraged to stay on existing routes to protect unseen Monument objects and limit the creation of social trails which may lead people unfamiliar with the area to become lost.
18687-1	Britt Zale 2093 Nighthawk Lane Moab, UT 84532		4 - I know camping has been a problem, especially along Beef Basin road. Why not more clearly label where camping is not allowed instead of the plans to either shut down dispersed campsites or requiring only metal fire rings? Will more metal fire rings be installed to maintain the current number of campsites?	ALT07-Modification of Existing Alternatives, REC03-Dispersed Recreation (where there are no formal recreational facilities)	Decisions regarding specific areas closed or open to dispersed camping, including specific dispersed campsites, will be analyzed in a site-specific plan such as an RAMP.
17573-105	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.18.3 Health and Safety-(page 2-71) Table 2-17, under all alternatives identifying unauthorized shooting areas, we recommend adding language stating official shooting ranges will be identified in coordination with the DWR within the BENM.	ALT07-Modification of Existing Alternatives, REC06-Shooting Sports/Hunting/Fishing	Thank you for your comment. The agencies will continue to coordinate with the State on implementation level planning considering recreation in BENM.
9221-2	Eirene Hamilton		It is quite evident that target shooting is enjoyed by Americans as a sport. There is rock hard evidence that target shooting, as a sport, is prone to violation. If allowed, who would monitor and reinforce stipulations? I have been disappointed by my visits to many petroglyph sites violated by gunshot. Target shooting has no place in the monument.	ALT07-Modification of Existing Alternatives, SHOOT02-in favor of shooting closures	In the Recreation and Visitor Services section of the Proposed Plan, recreational shooting would be prohibited in BENM.
9255-5	Keith Alleman		Regarding recreational shooting, I would support prohibiting it in the vast majority of BENM. Prohibiting it everywhere is fine, and limiting it to some small number of designated areas, on the front range zone, would be fine, too with closures if people were found to be violating the location restriction or otherwise couldn't behave responsibly.	ALT07-Modification of Existing Alternatives, SHOOT02-in favor of shooting closures	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15381-8	Sagebrush Habitat Conservation Fund		3.4.2.1.4. Biological Soil Crusts This section is lacking in terms of quantification of the existing environment and anticipated impacts. There is no indication of how many acres should have biological soil crusts, and how many acres having BSC are degraded.	ALTO7-Modification of Existing Alternatives, SOILS01-General	Under the Proposed Plan, agencies, in collaboration with the BEC, would identify areas with BSCs and classify those crusts to best protect them. The Availability of Data and Incomplete Information section in Chapter 3 states agencies used, as appropriate, however qualitative discussion may be used where quantitative information is not available.
14767-141	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Moving into the main sections of the DRMP, we see a problem that runs throughout the DRPM. Nice aspirational goals with no requirements or limitations to achieve those goals as required under Appendix C and elsewhere in the BLMs planning directives. I understand you find the BLMs planning directives inconvenient but that does not excuse your failure to implement them as is the duty of BLM employees. Take for example Section 2.4.5.1: Promote sustainable soil functions and interactions with all other resources on the Monument and maintain or improve soils to a suitable level of functionality, with soil properties appropriate to site-specific climate and landform and to the total functional composition of soils on the Monument. What limitations and requirements have been put in place to promote sustainable soil functions? What is sustainable soil functions? What is a suitable level of functionality in the context of the protect and restore mandate? Unknown. The EIS does not define these.	ALTO7-Modification of Existing Alternatives, SOILS01-General	An explanation of soil functions has been added to the environmental consequences section of the Soils and Biological Crusts section in Chapter 3. Soils in BENM would be managed to be consistent with the proper care and management of Monument objects and values, so specific land use plan goals and objectives are not needed. The agencies and the BEC would evaluate and determine site-specific soil management actions through implementation-level management planning and action.
14767-142	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Only 2 actions are proposed: If new discretionary actions cannot be avoided on slopes between 21 percent and 30 percent, as applicable, an erosion control plan would be required. The plan must be approved by the agencies prior to construction and maintenance. No discretionary actions would be allowed on slopes greater than 30 percent unless necessary to protect BENM objects. Protect snow courses from site modification. Firstly, this only applies to new discretionary actions, eliminating virtually all degrading actions from its purview. Secondly, the primary source of soil degradation, livestock grazing, the BLM has simply defined as not discretionary. Thirdly, only a plan would be required for the rare action not exempted. What the plan would do or how effective it would be is completely unknown. Then we see again that the BLM has mis-defined livestock grazing as mandatory instead of discretionary. Agencies would collaborate with the BEC in identifying areas with BSCs and classifying those crusts to best protect them. These protections could include seasonal closures of areas to visitation during drought periods and ceremonially and traditionally important times of the year. Then the second merely requires the BLM to collaborate a meaningless bureau-speak. Then the BLM will classify and identify. It does not mandate protection, it only mandates collaboration to identify and classify. Further, virtually all areas within BENM are BSC-dependent systems yet the BLM, in its ignorance of this fact, relegates BSC to an outlier, not as the foundation of the ecosystem. Then based on the wording above, it ignores the largest impact to BSC, by far, livestock grazing.	ALTO7-Modification of Existing Alternatives, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	The Proposed Plan has been updated to include surface disturbing discretionary actions. The Livestock Grazing section of the Proposed Plan and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator. Under the Proposed Plan, the BLM closes 817 fewer acres to grazing when compared to Alternative B, C, and E. The agencies clarified the issues statement in the Terrestrial Habitat and Vegetation Resilience and Conservation section in Chapter 3 to clarify discretionary uses. Grazing management in the Proposed Plan is designed to protect resources, including objects of BENM. Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." Grazing is a discretionary action and agencies can under existing laws and regulations suspend or cancel permits and to close areas to grazing either temporarily or long-term.
3867-3	Judy Buckinghsm		I support Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes. Alternative E should also be modified to prohibit mechanical treatments and commercial timber harvest.	ALTO7-Modification of Existing Alternatives, Traditional Indigenous Knowledge01-Traditional Ecological or Indigenous Knowledge	Consistent with Proclamation 10285, the Proposed Plan directs the agencies to collaborate with the BEC on implementation of the management plan and management of the entire Monument. The Proclamations also direct the agencies to include Traditional Indigenous Knowledge and expertise in the management of BENM. See the Proposed Plan in the Vegetation section and the Forestry and Woodlands section. In the Vegetation Section, the Proposed Plan says that vegetation management would include all available tools, including mechanical methods, consistent with the protection of BENM objects. No chaining would be allowed and light-on-the-land techniques would be used where practicable. In the Forestry and Woodlands section, the Proposed Plan says that agencies would collaborate with the BEC to identify criteria and/or areas for commercial timber harvest if activities protect BENM objects.
6569-1	Alan Wells		I strongly am against the Alternative E draft resource management plan of Bears Ears National Monument because it relinquishes the responsible and informed land management of the monument and its magnificent recreational sites to an unelected group that answers only to their own ideas. Alternative E blindly assumes that Traditional Knowledge of the Indigenous peoples should steward these lands and resources under conditions and situations not experienced before and not by their ancestors.	ALTO7-Modification of Existing Alternatives, Traditional Indigenous Knowledge01-Traditional Ecological or Indigenous Knowledge	Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. Traditional Ecological Knowledge, just as Western Science, is simply a method for generating knowledge. As stated in the Traditional Indigenous Knowledge and the Bears Ears Landscape Section in Chapter 3, Traditional Indigenous Knowledge is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives. The agencies follow the applicable laws and policy in resource management planning including NEPA, FLMPA and others which provide a framework for the public and other entities to participate in and inform land use planning.
889-57	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We strongly oppose the provision in alternative B, D, and E which would prohibit public access to the interior corridor of the Moon House ruin. Moon House is the most famous ruin in Bears Ears National Monument and visitation is already well managed to protect this cultural site. Visitation already requires a permit and is limited to only 20 people per day. In order to be issued a permit, one must reserve a permit online and then pick it up in person at a range station, where each visitor is advised of the rules and told the importance of visiting the site respectfully and carefully so as not to damage it. Only four people are allowed inside the interior corridor at a time, and going inside any of the chambers connecting to the corridor is already prohibited and clearly signed as such on-site. When I visited Moon House in May of 2023 I found the site to be pristine and it was clear that visitors have been doing a good job of following the rules. There was no damage to the structure and both my party and other visitors we saw were extremely careful and respectful when accessing the interior of the site. Unless the BLM has clear evidence that the current rules have been insufficient to protect the	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Although inadvertent, impacts from visitation do occur every time a visitor enters the interior corridors of Moon House, the Cultural Resources section in Chapter 3 has been updated for impacts to Moon House and cultural resources generally. Additionally, Moon House, while an important recreation destination for visitors, is not the most visited or most popular archaeological site in BENM. Visitation to Moon house will still occur under the Proposed Plan under an allocated permit system, like current management, but access to the interior corridor will be prohibited. This was analyzed in the management plan and this action will help preserve the site for future generations.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			structure and that people accessing the interior corridor have been damaging it in some way, the new proposed rule to ban people from going inside is simply unnecessary and unjustified.		
13871-1	Chris Mccallum 363 Granite Falls Way Grand Junction, CO 81507	Utah Back Country Pilots Association	I do not want these back country airstrips closed it is the only was for many people to access this aera, aircraft do not leave a footprint and the only time you even know they are there is during takeoff and landing, my tires do not even kill the weeds, these strips have been there since the 50s if all the roads are closed it will be the only way to access for emergency's fire or wounded people.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
775-1	Jason Blake St George, UT 84790		The amount of noise generated by aircraft accessing backcountry strips is minimal and limited primarily to arrival and departure. The draft RMP as currently written states that aircraft meet the definition of Off Highway Vehicles (OHV). As aircraft generally only land on designated landing strips, they don't really meet the definition of an OHV. Aircraft are not going to be "going off-road" and creating any new landing strips. The environmental impact is completely different. Aircraft make very little noise (relative to OHV's) and have very little impact on the airstrips. In addition, aircraft would have minimal impact on other recreational users and actually can alleviate pressure on the dispersed camping that is accessed by roads. In addition, these backcountry strips provide not only the recreational aspect as noted above, they provide access to our public lands for fire fighting, search and rescue and evacuation if needed. These airstrips also provide pilots transiting this remote part of Utah a safe place to land in an emergency. The draft RMP as written would only allow aircraft to land at the Bluff Airport and Fry Canyon airstrip, denying access to the other 16 airstrips within the BENM. The draft RMP, however, also states that OHV's are allowed to travel on any OHV designated route that is designated as open. Limiting aircraft to just Bluff airport and Fry Canyon airstrip denies aircraft the same recreational use of the BENM as OHV's. Access for camping and OHV use within BENM requires hundreds of miles of road maintenance, whereas backcountry strips require only the lands that have already been identified as landing sites on Department of the Interior topography maps since the mid 1900's. I for one am a "leave no trace" recreational user of public lands, and in my experience, most if not all backcountry pilots I know are stewards of the environment, and often will pack out excess trash they may find at these strips (within the capability of their aircraft). As a member of the Utah Backcountry Pilots Association (UBPA), I am proud of our collaborative and cooperative working relationship with the various BLM offices within Utah over the years to maintain and clean up the backcountry strips within the State. Many of these strips have been in existence and use for over 70 years, and the fact that many other land users don't even know of their existence speaks for the minimal impact they have for other land users. I sincerely hope these airstrips will not only be recognized, but included in the final BENM Resource Management Plan for recreational aircraft use.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. OHVs are defined in 43 CFR 8340, and include motorized aircraft when not in one of the excepted categories (i.e., emergency use, authorized use).
8838-1	Greg Williams		Ive been planning to come on a trip out to fly these back country airstrips. What a shame it would be to lose them. Aircraft are so infrequent, I dont understand why theyd need to close them and loose this beautiful USA freedom. Anyone who uses small airfields will know how they only contribute to the environment where they sit. With less traffic they will surely fall into disrepair and close, a loss for all, including those who manage the landscapes the sit in. I ask what is the reason for banning these aircraft? Lets solve that reason, not ban an entire industry that essentially supports the general aims this ban is supposed to address. Never alienate the people who can support and advocate what youre trying to achieve. If its about environmental impact, dont be daft, these flights have such a minor impact and future innovations are coming fast to eliminate them. A dose of common sense is in order, dont loose this access and dont loose the tourism it can bring.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8850-1	Steve Williams		By classifying aircraft as OHVs but allowing access to only Bluff and Fry Canyon, pilots are being denied the same recreational opportunities as other OHVs. Please be fair. Airstrips also provide emergency access for all users such as firefighters and rescue units. Additionally, these airstrips provide emergency and precautionary landing opportunities for aircraft flying over Utah.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. OHVs are defined in 43 CFR 8340 and include motorized aircraft when not in one of the excepted categories (i.e., emergency use, authorized use).

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
8850-2	Steve Williams		I hope that all backcountry airstrips in the Bears Ears National Monument boundaries will be recognized as historic aviation access treasures and included in the final Resource and Travel Management Plans, and that access will be maintained, both now and in the future. Please preserve Utahs rich backcountry aviation history and protect access to these airstrips.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8857-1	Jim Hook P.O. Box 309 Bluff, 84512	Bluff Airport 66V	Ive been associated with the Bluff Airport as the volunteer manager for 30 years, both when it was a San Juan County facility through a BLM lease and now as it is a Town of Bluff facility through a BLM lease. There are a series of unimproved landing strips throughout SE Utah that are and have been used as training seminar locations for back country pilots. These strips were created to allow access for geologists and workers to mine operations. Mineral exploration is a part of the history of BENM and signs of that history should not be completely erased. Touch and go landings do not affect any of the attributes that the BENM was created for. Bluff Airport has largely supported pilots who have come to further their skills. The Bluff hanger has been largely funded by rentals to pilots who come solely for that purpose. Lodging and food establishments in Bluff have benefited from money spent. Removing all access to those dirt strips will adversely affect both the Bluff Airport and businesses in the Town of Bluff. Mineral exploration is a part of the history of BENM and signs of that history should not be completely erased and access to backcountry strips should be included in any of the final management plans.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8859-1	Jeremy Roberts		I am writing to support continued access to all 18 airstrips in the Bears Ears area. These are an enjoyable and vital access point to the landscape - require little to no ongoing maintenance and have minimal impact on the surrounding area. Aircraft have relatively low noise impact and also provide egress and ingress access to people wanting to enjoy the area away from the roads and busier access points. Please keep them open.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
898-1	James White 685 e 3065 s Salt Lake City, 84106; Bianca Bischoff 232 e 1500 s Lehi, UT 84043		Backcountry aviation allows us to access remote areas in a way that is both environmentally friendly and minimally impactful. By using established airstrips, we can enjoy the vast wilderness without the impacts of more traditional OHVs. Moreover, by allowing access to these airstrips, the overall level of safety will be raised for all who are enjoying our public lands, as it will allow faster access to individuals who may be in need of assistance, but far from an accessible road. These airstrips also provide essential access for fire fighting, rescue, and ambulatory services, as well as safe emergency landing sites for pilots. I hope that BLM officials will recognize the value that these historic backcountry airstrips provide to both the aviators who utilize them, and to the general public. I strongly urge the BLM to preserve access to our public lands via these historic airstrips within the Bears Ears National Monument, and ensure their inclusion in future Resource Management Plans and Travel Management Plans.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
889-107	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	In banning motorized users from Arch Canyon, the BLM would be favoring a nebulous and unquantified (but likely extremely small) number of non-motorized users over a much larger number of motorized users. While it is unknown how many multi-day backpackers would hike through Arch Canyon who currently refrain from doing so because of the presence of motorized users, the demand for motorized access to Arch Canyon is well-known to be extremely high. This is evidenced by the fact that Arch Canyon has regularly been featured in off-road guidebooks, websites, and jamborees for decades, and is indisputably one of if not the most popular motorized routes in the Bears Ears region. The Arch Canyon Jeep Jamboree has been taking place there for 33 years, and there are also numerous informal Jeep and UTV club rides there each year. Multiple commercial outfitters offer UTV tours in Arch Canyon under permits from the BLM, making significant contributions to the local economy.28 All of these contributions would be lost if Arch Canyon is closed to motorized use, and some local guides could very well lose their livelihood. Why then, should the demand for use of Arch Canyon by only a few hikers outweigh the much greater demand of a large number of motorized users? If the relative size of demand by the two competing user groups matters at all, then the agencies choice is clear. Motorized access to Arch Canyon must be maintained.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon would be allowed with a permit.
889-116	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Moreover, these airstrips are crucial for safety and emergency responses, including Search and Rescue operations, firefighting, and providing essential landing options for aircraft encountering in-flight emergencies. The strategic importance of these airstrips cannot be overstated, especially given the challenging terrain of southern Utah.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no

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					designated airstrips on the NFS managed portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
9290-1	Jeff Swartwood		Recommend against including aircraft in this proposal. Aircraft have a very low impact on the environment.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
899-1	John Findarle 140 N Center St. Midway, UT 84049		I have a friend who is a paraplegic. He cannot hike in to these back you try areas. However with the use of these back country airstrips. He is able to be flown in and enjoy these wonderful areas. Do not take away this experience for these disabled persons.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws.
1008-1	Tim Lapage		All 18 of the airstrips have existed and been in use for the past 40-70 years and we request that none of them be closed or banned arbitrarily without first evaluating the merits of each. Small non commercial aircraft Cause no environmental stress and there use of the airstrips are short term and damage nothing and harm nobody. To close them would be a violation of rights, And would not achieve anything.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1014-1	Sterling Brandt		Please reconsider the closing of the backcountry airstrips in Bears Ears National Monument. Aircraft that use these airstrips do not negatively impact the environment and provide a way for lovers of these remote areas to access public lands. I am a member of the public, I pay taxes, I am a private pilot, and it is my desire to keep these airstrips open, as they have been for decades. Closing these airstrips is not in the best interest of the public.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1017-1	Brian Rodgers		I disagree with the reported plan to close almost all of the Bear's Ears National Monument backcountry airstrips. Those features do not detract from the wilderness experienc, provide a means for rescue of injured hikers, and allow greater access to what is the people's land.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1022-1	Ernie Meruelo		Please do not restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode, and these strips have been open for many decades without incident. Access to the backcountry out west is being restricted on a daily basis. Backcountry airports have provided critical access to these remote areas necessary for first responders reacting to medical emergencies and wildland fires.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.

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1024-1	Chris Thayer		I am OPPOSED to BLM closing the 16 targeted Bears Ears National Monument remote air strips. I am a CFI, CFII, Single & Multi Land airplane. These strips offer aviation opportunities unlike flying into "suburban" air fields: navigation challenge, remoteness consideration; planning; and specific aeronautical skills. These fields were paid for with Aviation-based taxes for general aviation use. They are part of the General Aviation network to be used by the appropriate craft. Aviation opens rapid access in critical times to many relatively remote parts of the country outside of suburbia. These remote strips can become essential for emergency access and "jump points" for emergency crews responding to human victims recreating in the area or for firefighting and other disaster events ~ it allows crews to arrive in the area much faster than terrain vehicles could deliver them. It MINIMIZES the impact on these wilderness areas allowing minimalist hikers & campers to arrive without using wheeled transportation that has a harsh impact on the land, vegetation, and animals. Providing this level of remote access via land transportation would involve miles of destructive and invasive road construction severely impacting the area both physically and aesthetically. Roads and the associated vehicles accessing this interior are both unsightly, conspicuous, and have lasting negative impact; airfields are almost invisible and the aircraft noise is of short duration and has little effect on animals' habits.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
1027-1	Carl Holder		MAINTAIN ACCESS TO PRIVATE AIRCRAFT Backcountry airports represent one of the greatest opportunities for the public to experience the great backcountry. This has been my personal experience. This access has little, if any, impact on the public lands. At the same time, the airports avail access to lower mobility citizens who could not experience the beauty of these lands. Now over 70 years old, I cannot visit these beautiful lands due to physical limitations; however, I can and will visit the backcountry from Moab UT where I travel frequently. Importantly, these airport strips are maintained by volunteers, and provide valuable, potentially life saving access for emergency and fire personel. Please consider the high importance to maintain access to these incredible public sites.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
1028-3	Robert Isherwood		I urge the BLM to maintain the airstrips in Bears Ears National Monument. While I personally have not visited BENM, my family has utilized airstrips on the area. Aviation and outdoor recreation are integral to our lifestyle, and access to public lands is crucial for everyones enjoyment and connection to nature. I acknowledge there might be concerns about funding or logistical issues associated with these airstrips. Nevertheless, I strongly advocate for keeping them operational and suggest the BLM consider collaborating with the community. There are many enthusiasts, including myself, who would be willing to volunteer or provide resources to help sustain this valuable access.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
10626-9	Debra Van Putten		As to Alternatives B-E, the EIS is deficient. A review of the maps layers in the appendices reveal a great deal of confusion and imprecision, making it impossible to understand what will be closed and what wont. For example, for all of these alternatives, Snow Flat Road is shown to be in an area closed to OHV, (Exhibit L) yet the road is still shown to be not closed in the inventory of roads surviving for option B, C, D and E. Who knows what the disposition is for this 150 year old historic by-way. Combs Ridge, at the heart of the monument, is shown partially or fully within the area closed to OHV motorized vehicles, but may or may not be closed based on the provided road map layers. Lest one think that perhaps the cross hatched OHV closure areas doesnt affect the road not marked as closed, a review of the roads in the Manti- Sal area, such as Elk Road, appear to show gerrymandering to avoid some roads, implying that a road in the closed area is closed unless specifically excluded. Depending on how one interprets the maps, significant portions of Muley Point, the Valley of the Gods, Comb Wash, Johns Canyon, Snow Flat Road, access to River House ruins, access into the Manti-Sal, and Lavender/Davis Canyons in addition to Arch Canyon. All are treasured routes, all are routes I would like to drive or redrive, many are world famous, and none should not be closed. All of them provide education as to the diversity landscaped settled by Native cultures and the Mormons. I note that, without any explanation why, Muley Point is to be closed only to hikers. It is not a high use area, it is without a doubt and without exaggeration one of the most spectacular views in the country. The outlook is almost entirely stone and I cant imagine why a closure would be called for, and it seems to me that there would have to be a substantial reason the justify its loss.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The roads referenced by the commenter are in OHV limited areas in the Proposed Plan, as show in the Proposed Plan, routes within off-highway vehicle area designation map in Appendix A. Please see BLM and USDA Forest Service alternative layers in the interactive map, rather than base layers, which may be provided by an external source. Also, for the NFS lands see Manti-La Sal National Forest Motor Vehicle Use Map (MVUM)., https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1180260.pdf . The existing authorized travel network is described under the affected environment and analyzed under the No Action Alternative. Specific road designations (including open, limited, or closed) are implementation-level decisions that are not addressed at the planning level in the RMP/EIS. Implementation-level planning will be consistent with the management direction in the approved RMP and Presidential Proclamations 9558 and 10285.
10648-1	Gregory Babush Norwood, CO 81423		I am aware that there are numerous airstrips in Bears Ears that the flying public will loose access to. I am writing to request that these 18 airstrips all remain open to pilots, not just the proposed 2 with 16 closing. Access to public lands via aviation is essential to allow public access to our public lands, and backcountry aviation is minimal impact use. Maintaining access to these airstrips increases safety for all, allowing for emergency access, or emergency landing, if needed. I ask that all 18 airstrips in Bears Ears remain open.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

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					aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
11236-4	Lloyd Nielson 140 N 100 W Blanding, UT 84511		if we close this canyon to motorized vehicles, we are locking out a very large percentage of American people and also international tourists. One of the most important groups is the Wounded Warrior veterans, whom would be virtually locked out because of their disabilities. Though they are gone, this would also have locked out the Navajo Codetalkers. You are talking about locking out all the disabled citizens, and especially these heroes who fought for our freedom and land.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The existing authorized travel network is described under the affected environment and analyzed under the No Action Alternative. Specific road designations (including open, limited, or closed) are implementation-level decisions that are not addressed at the planning level in the RMP/EIS. Implementation-level planning will be consistent with the management direction in the approved RMP and Presidential Proclamations 9558 and 10285.
1194-1	John Donald		It is not necessary to use orv's to enjoy the monument. Indeed their use detracts from the enjoyment by others.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. Proclamation 9558 (incorporated by reference into Proclamation 10285) limits designation of new routes within BENM to those needed public safety or protection of BENM objects. The Proposed Plan does not have any areas designated as OHV open. See The Water Resources, Vegetation, Soil Resources, and Cultural Resources sections for a discussion of impacts on the resources provided in the comment from OHV use.
1229-1	Darcy Kendall		The effects of ORVs on the Western landscape are well-established, particularly on soil erosion, noise pollution, and habitat degradation—ORVs don't belong here.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The Proposed Plan designates areas as OHV-closed or OHV-limited, using the best available data for the Planning Area. See the Vegetation, Soil Resources, and Wildlife and Fisheries sections in Chapter 3 for a discussion of impacts from OHV use to the resources presented in the comment.
1273-6	Robin Poppen		Arch Canyon should have been closed to off-road vehicles long ago so please take this opportunity to do it now.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
12926-1	William Lawson 1917 County Road I Somerset, WI 54025		I think keeping these airstrips open is a freedom that we as a US citizen should have. our ability to utilize the beautiful country we have keep getting restricted for the use of a few people Thes back country airstrips are useful not only for recreation and easy access to the back country for people that cannot do the arduous trek to get to back country, they are very useful for search and rescue and supplying good access for land management purposes like fire fighting, they have very minimal impact on the environment and they have a very minimal impact on the areas they are in. I oppose eliminating them or restricting their use as that will continue to take freedoms we have to utilize the country we have.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
12994-1	Brad Peck		Closing backcountry airstrips in the "Bears Ears" will inevitably, eventually, cost the lives of pilots and passengers in need of emergency landing locations, and individuals recreating on the ground in need of rescue and evacuation.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
13084-1	Jeff Russell		Please continue to recognize all 18 of the existing airstrips in your resource management plan. Many of these airstrips have existed for over 70 years and they provide access to fantastic recreational opportunities. These areas are very remote and travel to them is much more expedient by the means of an airplane. Airplanes also provide access to these areas with persons with physical disabilities that otherwise may not be able to access these places. I have made several trips to these airstrips and practice and promote a leave-no-trace philosophy when visiting them. These airstrips help to relieve pressure from other dispersed camping by providing pilots the ability to camp on or near the strips. Please change the draft plan and officially recognize all 18 airstrips.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
13093-1	Paul Leadabrand	Stick & Rudder Aviation	In our opinion as a flight school, using the airstrips as our tools for safety, and environmentally conscious educational training... Access to public lands (only managed by the government) should CONTINUE to be granted (not restricted) to all user groups - this is to include aviation. Eliminating access (airstrips) does not disperse the user groups - it either consolidates the use to the remaining few access points (environmentally harmful), or prejudicially restricts one of the user groups (in this case - "Aviation").	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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1333-1	Charles Roell		Those airstrips are useful for training new pilots as well as enjoying the great outdoors. General aviation is one of the reasons the US pilot population and accessible airfields are the envy of the world. Back country strips also allow for convenient movement of fire fighting crews and wildlife management teams. I strongly urge your organization to reconsider the notion of closing these airfields.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1386-1	Kelly rosser		I am opposed to the closing of 18 back country airports in the Bears ears national monument.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
13955-1			During these flights, I often land at the airstrips that will be affected within the Bears Ears area and definitely plan my flights over these airstrips for safety purposes. Without the safety factor afforded by these strips I would not attempt many of my conservation and gift-giving missions. All of my flying explicitly includes a Leave no Trace mindset and all attempts are made to keep my transient noise impact at a minimum. The bottom line is that the maintenance of these strips (primarily by the UBCP) allows me to use my airplane to address important environmental issues within the Bears Ears region.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1408-1	Bruce Moore		As a pilot and a lover of the outdoors, I want to strongly recommend that the backcountry air strips be kept open. They are vital to our enjoyment of this part of the country. General aviation pays considerable taxes, especially through fuel taxes, and other fees that roll into the federal and state coffers.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
14126-1	Barry Porter		I am writing to ask you to maintain access to the air strips in question. Ive been enjoying the Utah backcountry for the past 10 years flying my Cub. The strips provide access to areas that otherwise require long periods of ground travel incurring significant soil erosion, air pollution, and noise pollution. Accessing these areas by Aircraft, using the existing strips, alleviates most of these issues. Travel times by aircraft are short and the only ground operations occur on the air strips. Air travel to these areas is by far the preferred method for access. Air access is a traditional part of operations on public lands.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1416-2	Douglas Lumgair PO Box 311 Windsor, CA 95492		Would it be a possibility to not name the other back-country landing strips as approved but instead to state that general aviation, law enforcement, and rescue aircraft will not be prevented from using any historic landing sites in the area. It seems maybe this would relieve some of the liability or maintenance concerns that might exist.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
1481-1	Michael Perkins		Please carefully consider not closing the 18 airstrips in the Bears Ears National Monument. These airstrips offer low impact access to important recreational assets for both commercial and non commercial operators. Without these airstrips, users will use other motorized means of access which is far more damaging to the environment. Volunteers such as The RAF and The Utah Backcountry Pilots have been and are willing to maintain these assets on the behalf of the American people.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no

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			Some of these airstrips have been in use for nearly 70 years and should be considered national treasures as are the Monuments.		designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1484-4	Lisa Potter		Please implement a zoned approach to recreation management to help concentrate use and development for recreation where it is most appropriate to protect the the area and keep existing trails open. Please do not close Arch Canyon to off-road vehicles. If closed you will be restricting public land to only the elite athletes that can walk/hike to areas and will discriminate against veterans and others that are disabled and unable to walk/hike to Arch Canyon. There are thousands of acres already inaccessible to disabled citizens, why take away even more from them?	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The Proposed Plan employs a zoned approach to recreation management. Arch Canyon is designated within an OHV limited area in the Proposed Plan.
1495-1	Dr L		This is a huge area of wide open country with very few traditional landing strips for emergencies. I know many backcountry pilots who use them for remote camping and also belong to pilot groups who perform much of the maintenance and up keep. To close them would remove access to a very devoted group of outdoor users.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1499-1	Kyle Jones		Please do not arbitrarily close landing strips in Bears Ears National Monument. So many roads have already been closed and essentially closing the park to aviation further restrict the types of recreation available. The airstrips have very little impact and I don't see any benefit in their closing. There are abundant benefits they provide outside of recreation including research, fire prevention/control and search and rescue.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15060-1	Greg Haerr 5469 Walker Estates Cir Holladay, UT 84117		In particular, from a pilot's perspective, the 16 or so dirt airstrips in the Bears Ears Monument area (and of course others nearby in Southern Utah_ are mostly quite remote, and inaccessible by other means. Some of these airstrips are the only means by which the the fabulous country can be accessed, and air traffic does not bring with it the issues associated with vehicular access, including trash, roads, or any erosion at all outside the actual tiny airstrip runway itself. Additionally, the airstrips provide very important fast access to get close for emergency access where if closed, there would be no other fast access available. I myself have provided help and brought in essential supplies to those in need over the years, and it is not always possible to have a helicopter available for emergency access, given the vastness of the Bears Ears area. I understand that the current proposal is to only allow access via the paved runway at Bluff, and the dirt runway at Frye's Canyon. I also understand that the reason for this BLM study may be in response to vehicular issues, which I must note are entirely separate from remote air traffic at the very small airstrips being considered for closure. I cannot see any good reason to mix up the complaints of vehicular issues with those of aircraft at extremely remote airstrips, where there are no roads present! I might note that aircraft access to Utah BLM land has an extremely small impact on the area, when compared to cars, and even hikers. Hikers almost always arrive via car and have the same issues associated with vehicles. Air-in, air-out only is entirely different, with indistinguishable impact on public lands. Closing any airstrips that have been open for 50-90 years with the statements that "they may be reconsidered for opening later" is not a good idea, as everyone knows that once shut down, like rights taken away, they are rarely reinstated without massive regulatory or congressional action, which is rare indeed for the people these days. In general, I believe the BLM has managed the area quite well. Rather than making major modifications to access to public lands which will have very little actual impact or effect regardless, I propose keeping most all, if possible, airstrips as-is and unclosed for the Bears Ears area. Especially, the following airstrips should be considered as included in the "don't change" list with Bluff and Frye's, and remain open: - Brown's Rim - Valley of the Gods - Red House Spring - Dark Canyon (N and S) - Hammond - Mule Canyon - Dry Fork Canyon - Deer Flat - Polly Mesa - Clay Hills Crossing - Long Canyon - Lockhart Basin and Lockhart Road In summary, keeping the airstrips open in Bears Ears Monument area affords pilots of the public unprecedented, non-intrusive access to our public lands using established, historic airstrips. These are also at times necessary for emergency use including fire fighting and rescue use. I share the view of "leave no trace" and keeping our Utah public lands as they are today.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
15065-2	William Murrow 2060 State Highway 595 Lindrith, NM 87029		Please note that the light aircraft used in backcountry flying provide many benefits for the public and the public land management agencies. Airstrips support more widely distributed recreational use activities, lowering the impacts on the environment and other users when such uses are concentrated. This fulfills an important objective of the BLM. Thus those areas become accessible for many purposes without requiring the building and maintenance of countless miles of graded roads or trails, often in environmentally sensitive areas. Such roads are expensive to build and maintain.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no

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			Airstrips provide access both for representatives of BLM and other agencies to manage and conduct studies in remote areas that would be otherwise difficult or much more expensive to reach. They also provide a means of finding and retrieving lost hikers and others from such areas. And in the event of an aviation emergency they provide opportunities for landing disabled aircraft in locations where off-airstrip landings would be hazardous or impossible.		designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
15180-2			With little impact to the surrounding areas, the net total reclaimed land from such resources, on the scale of a facility such as Bears Ears, is minimal: They are NOT a barrier to wildlife transit, nor habitat-changing outside their limited extent (no leaching, noise, runoff, etc). In fact these limited clearings can create space for grazing animals. Upkeep is minimal, and while I suspect of the cost of such upkeep was a decisive aspect regarding their continued use, there are volunteer groups in the flying community that would pitch in to keep such rare assets if called upon. Meanwhile these airstrips are vital assets to back-country fire management, as well as obvious back-country recreation resources. Once gone, recovering or creating such remote assets will be unattainable: Back-country access is an institutional responsibility and a national an equity issue: they offer recreational access to the disabled and those with limited mobility and without the need for strenuous physical activity to enjoy our public lands. Access should be provided for all 18 airstrips by private, non-commercial, fixed-wing aircraft for recreational use, the same use that has been ongoing for the past 40-70 years. Aviation has a very small environmental footprint, the lightest footprint form of access to these lands: Access by air requires NO road, nor infrastructure like bridges or corrals. Access by air eliminates miles of dusty road traffic. Noise from aircraft is transient and of short duration. Peer-reviewed research substantiates that small aircraft noise has no detrimental impact on wildlife. Airstrips are situated on natural flat land features, such as level, open meadows with little occurrence of soil disturbance, erosion or runoff. Airstrips are trailheads for non-motorized activities, participating in hiking, camping and other Leave No Trace activities. Back-country Airstrips provide vital emergency access for Search and Rescue, Emergency response Firefighting, and Airstrips offer possible life-saving landing options for small aircraft while flying over the relatively unforgiving terrain in southern Utah.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
15283-1	Cory Wolf		As a professional and recreational aviator, I wanted to express my support for maintaining, opening, and improving airstrips within the Bears Ears. These airstrips not only provide an environmentally friendly way to access public lands, but are an invaluable resource for fire fighting, search and rescue operations, and as emergency landing sites in otherwise inhospitable terrain. These airstrips serve as environmentally friendly access points to our public lands to hunt, fish, hike, rock climb, and camp. These airstrips not only need to be kept open, but need to be protected as trailheads. Access via aircraft needs to be recognized in the planning process as a legitimate means of accessing our public lands and included specifically in travel plans. The UBCP works with the BLM to maintain these strips, develop protocols for using them, and educates the flying public on their use. Please retain all airstrips within this travel plan and work with the UBCP to improve them. Also please support our efforts to reclaim airstrips that have been neglected.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
15323-1	Bill McGlynn 1711 W College St Bozeman, MT 59715	Recreational Aviation Foundation	In our review of the Draft Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS) for the Bears Ears National Monument, we are concerned that the DEIS has the appearance of being predecisional regarding the authorization of recreational use of remote airstrips. We generally welcome the opportunity to participate in agency planning processes to gain authorization for recreational use of backcountry airstrips, however, we have concerns about the offer in the DEIS for the implementation-level planning process. On its face, this implementation-level planning appears to be a legitimate process offered to provide an avenue to authorize recreational use of additional airstrips. However, we see elsewhere in the DEIS that new limitations imposed by Proclamation 10285 would likely preclude any such authorization. For example, the third paragraph in section ES-5.1.1.13 on page ES-19 states, Two airstrips would continue to be open for landing or takeoff of aircraft under Alternative A, but no new backcountry airstrips can be designated under this alternative without implementation-level planning. Under Alternatives B, C, D, and E, additional landings and takeoffs at backcountry airstrips, beyond the two identified under Alternative A, could be allowed through a formal authorization process, only if the use is beneficial to BENM objects, potentially resulting in increased impacts to soundscapes adjacent to these existing but undesignated airstrips. Although we welcome any opportunity to open backcountry airstrips and we see that opportunity provided in Alternatives A, B, C, D, and E, the phrase only if the use is beneficial to BENM objects suggests that the use of any additional airstrips would not be available for public use, including recreational use. Because of these statements limiting additional airstrips to public safety or protection of such objects, we are concerned that the offer to authorize additional backcountry airstrips in the future would not include use of those airstrips for recreational purposes.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15323-5	Bill McGlynn 1711 W College St Bozeman, MT 59715	Recreational Aviation Foundation	If it is the BLMs intention to authorize recreational use of additional airstrips through the implementation-level planning process, then the pathway for success should be made clear and unambiguous in the Draft RMP/EIS. We do hope it is BLMs intention to make additional airstrips available for recreational use by the public as that has been the expectation of the stakeholders throughout this planning process.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no

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					designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15364-1	JT Clark 664 Skyview Circle North Salt Lake, 84054		I am greatly concerned by the proposed closure of established airstrips to backcountry aircraft throughout Bears Ears National Monument. For me, the fly-in experience enables me to escape from the crowds and get to the backcountry, using transportation that has nearly no impact. My flights inbound are short, the plane itself (bushwheels, light aircraft) have almost no measurable impact on the environment, especially when kept on existing strips. But those airstrips provide access points that enable me and my passenger to effectively backpack from the plane, experience the wilderness, and depart in a manner compatible with LNT ethics. Comparison to other OHVs (jeeps, side by side, ATV, etc) is a bit ridiculous, given the extreme difference in environmental impact.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15437-2	Brian Huffaker		I do however find the restrictions on motorized aircraft to only use Fry Canyon and Bluff Airport to be too strict. While I would oppose creation of new airstrips in the monument area, allowing continued use is in keeping with the values the monument was created to preserve. At a minimum manned, powered aircraft should be allowed to use existing airstrips in any area where OHV travel is allowed. Aircraft are noisier than OHVs, but for a shorter time. Also they do not cause nearly the amount of erosion and dust that OHV usage causes.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15474-3	Therese Bohusch; Jeff Franklin		Aviators bypass roads. Flying to Browns Rim airstrip, for example, from our home airport in northern Utah is a 3.5-hour roundtrip. Driving to Browns Rim is a 12-hour roundtrip. Because we fly, we do not impact road condition or contribute to vehicle congestion; and we can stay for shorter periods, minimally impacting the environment and access for other users. We also access the Utah back country by car-camping and mountain biking. But, we do this less and less often every year due to the OHV noise pollution, volume of vehicle traffic, overcrowded and limited dispersed campsites due to large OHV groups and the sprinter van generation, and degraded road conditions caused by increased and irresponsible use. Restricting aircraft access to the majority of Bears Ears airstrips, while allowing unrestricted OHV access to Bears Ears OHV routes denies aviators equal recreational opportunity. OHV users often trailer their vehicles, using hundreds of miles of roads that require extensive maintenance by federal and local agencies. According to state information online, Utah has over 230,000 in-state registered OHVs. According to the FAA registry, 8,254 aircraft are registered in Utah. The BLM should prioritize and encourage back country aviation access and airplane camping to decongest recreation areas for land-based users. Please, preserve access to all back country airstrips in Bears Ears NM.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1562-1	William Boggess		None of these airstrips should be closed or banned until the merits of each have been evaluated. These airstrips provide access to recreation for the flying community with minimal environmental impact, as well as access for first responders, not to mention a safe place to safely land an airplane in the event of an emergency. I strongly urge the BLM to keep all airstrips within BENM open and available for use.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
15643-1	Alex Hughston		As a Utah native, desert wilderness conservationist I strongly believe these airstrips need to remain open. I am a student pilot learning from my father-in-law, and aspire to one day be flying in and out of these amazing places. Its so low impact on the environment compared to other popular activities in the area. Pilots flying in these areas have a great reputation of taking care of the land leaving nothing but a few hundred feet of tire tracks.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1584-1	Jeffrey Lo 4159 Briarglen Dr San Jose, CA 95118		I urge you to continue to allow private, non-commercial access to the existing airstrips in the Bears Ears National Monument (BENM). BENM is vast and aircraft can provide access to those seeking to explore and enjoy this wilderness with little to no additional infrastructure. There are no roads or trails required, simply the already existing airstrips which allow aircraft to land bringing enthusiasts of both aviation and nature to these remote locations that would be difficult to access any other way. These airstrips are also a resource in times of need, acting as emergency landing strips for aircraft in distress or to enable expeditious access for search & rescue, emergency response and firefighting.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

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			These airstrips have been in use for decades enabling pilots to explore the wilderness and "Leave No Trace" so the wilderness remains for others to enjoy as well.		aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
16236-5	Michael Painter Californians for Western Wilderness, P.O. Box 210474 San Francisco, CA 94121	Californians for Western Wilderness	There should be an expansion of off-road vehicles route closures to keep ORVs away from sensitive cultural sites, which would serve several purposes: preventing direct damage to sites from ORVs; likely reducing visitation to sites by not allowing vehicle access and requiring visitors to travel on foot; and preventing damage to the landscape as a whole.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Cultural Resources section in Chapter 3 for a discussion of impacts of OHV designations on cultural resources.
16418-1	Shane Tully		Aviation infrastructure for recreational purposes provides the least intrusive form of access to given areas when compared to miles of roads. Minimally intrusive access methods such as this provide individuals otherwise physically unable to reach these areas access to our public lands. Moreover, we are continually and permanently losing access to airstrips like these. This reduces the utility of an entire category of transportation and the manufacturing jobs it supports. These airstrips should be kept open for both economic and recreational purposes.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1644-1			Hello, these back country landing sites are very important to the community when search and rescue teams are needed in these areas. Also these sites increase safety for pilots traveling cross country. Closing the landing sites would be devastating to the aviation community.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
1669-2	Kurt Thams 375 Tola Ranch Road Soquel, 95073		Unlike other forms of camping that require extensive road maintenance, these airstrips require minimal infrastructure and have an indistinguishable impact on the environment. By using these established airstrips, I am able to camp and enjoy the wilderness without contributing to the overuse of dispersed camping sites, which are becoming increasingly scarce.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1669-6	Kurt Thams 375 Tola Ranch Road Soquel, 95073		The draft RMP categorizes aircraft as Off Highway Vehicles (OHVs), which are permitted to travel on designated open routes. However, restricting aircraft to only two airstrips unfairly denies aviators the same recreational opportunities afforded to other OHV users. This inequity must be addressed to ensure that aviation enthusiasts can continue to enjoy and respect these lands as they have for generations.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1679-2	Chris C		The small stretch of dirt required for aircraft access is insignificant compared to the miles of dirt roads required for vehicle access, and the impact to the environment is correspondingly low. They allow for remote, primitive camping, and the backcountry aviation community has a strong leave-no-trace culture. In all my years camping at various Utah airstrips, never have I seen as much as a soda can left by fellow pilots. These airstrips are the ultimate low-impact trailhead. Aircraft do not chew up the soil like many other forms of access. Furthermore, aircraft campers do not use motorized vehicles once on the ground - pilots and their guests are almost exclusively hikers. Additionally, these airstrips provide an important resource for search and rescue operations. This should not be overlooked. Most of these airstrips have been in use for decades and pre-date the 1964 wilderness act. I am a member of both the Utah Backcountry Pilots Association as well as the Recreational Aviation Foundation, and both of these organizations work hand-in-hand with the BLM to provide volunteer maintenance and support of these airstrips, allowing the BLM to allocate those resources elsewhere as needed. It is for the many reasons above that I strongly support continued aviation access to these airstrips.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed

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1682-1	Nicholas Maass		I urge you to keep the airstrips in Bears Ears National Monument open. All 18 of the airstrips have existed and have been in use for the past 40-70 years. This legacy would be terrible to lose! No where in the world has the freedom of flight like what we have in the United States. These air strips allow visitors to enjoy Bears Ears NM in a way that can seldom be done. Keep these airstrips for the beauty of Bears Ears! Keep these airstrips for the freedom of the United States of America!	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
16980-1	Lori Dunn 31 W Cimarron Way Erda, UT 84074		I am opposed to the closure of motorized access in Arch Canyon. While I understand that there are resources in the canyon that need to be protected, I do not believe closure is the right answer. The canyon was busy on the day I visited as many people fear a closure and are trying to make one last visit before the canyon is closed. Albeit busy, people were still respectful of staying on the trail and I did not see any litter on my trip. BLM Monticello Field Manager, Juan Palma, was quoted in the San Juan Record (a local newspaper) as saying Its long been a desirable location for multi-day backpacking trips, which hasnt been ideal for backpackers to get in there while theres motorized vehicles in the canyon. This conflict could be managed by a calendar system where motorized vehicles are not allowed on certain days of the month. For example, the canyon could be closed to motorized use from the 1st to the 7th day of each month. This would allow all types of users to continue to access the canyon, instead of only those who have the physical capability of hiking long distances.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon.
17259-1			Close Arch Canyon to vehicles to protect its soil, creek, and wildlife. Amend the BENM RMP to show your plans to repair the road damage and restore the creek and soils.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
17326-5	Ben Muhlestein		I realize that Arch Canyon is not closed in all of the options, but I do not support the closure of that route in any option. OHV access to that route is important to many in our region and more particular to our aged residents and visitors. Hiking and biking of that route are extremely difficult, by closing it to OHV access you cut out one of the only canyons available to OHV access. There exists in the region many other routes that provide sole access to hiking and backpacking. That route isn't just important to the OHV locals, but also provides an important draw to OHV tourism that brings in critical traffic to our towns.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon.
17358-1	Ramona Blaber Oak Park, IL	Sierra Club	Fragile desert ecosystems are simply not compatible of ORV use and livestock grazing. At a bare minimum, all riparian areas must be off limits to these activities. To truly protect and restore this area, the entire monument should be protected from livestock and ORVs.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. Proclamation 9558 (incorporated by reference into Proclamation 10285) limits designation of new routes within BENM to those needed public safety or protection of BENM objects. The Proposed Plan does not have any areas designated as OHV open. See The Water Resources, Vegetation, Soil Resources, and Cultural Resources sections for a discussion of impacts on the resources provided in the comment from OHV use.
17573-116	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	On page 2-122 the plan states: "Public use would be limited to the following designated airstrips: Bluff Airport and Fry Canyon Airstrip. With the exception of these designated strips, aircraft takeoffs or landings would generally be prohibited within BENM. However, permitted landings/takeoffs may be allowed through formal authorizations, where the use is consistent with protecting BENM objects. Public use of BENM for UAS takeoffs and landings would generally be prohibited. However, permitted UAS landings/takeoffs may be allowed through formal authorizations, where UAS use is beneficial to protecting BENM objects. Agencies would consider seasonality of use for formal authorizations in collaboration with the BEC." FFSL questions whether or not there would be a seasonal application for landings on site if it is deemed necessary to protect human health and safety from wildland fires. FFSL recommends that BLM designate a site within Bears Ear National Monument as a Helibase in the event of a fire.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. OHVs are defined in 43 CFR 8340.0 and include motorized aircraft and drones when on or immediately above public lands and waters, and when not being used in an authorized or emergency capacity. San Juan County maintains a helipad near the Kane Gulch Ranger Station. Helicopter take off and landing in an official administrative capacity, such as fire management, is not covered by OHV definitions under 43 CFR 8340.0-5.
17573-40	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	A final point of concern with regard to travel management is backcountry airstrips. These airstrips certainly qualify for consideration under Section 106 and should be treated accordingly. Furthermore, these airstrips are critical for public safety and search and rescue within BENM. Certainly, the Agencies could keep the strips open administratively but with most of these strips that is not sufficient. These airstrips are generally maintained through use or by non-profit organizations that utilize them. Without public access, these airstrips will quickly be reclaimed and become unusable. The RMP/EIS provides no analysis or rationale that closure is necessary to protect the monument objects and therefore shouldnt be arbitrarily closed. Furthermore, absent proper analysis, like that available in a TMP process, the Agencies cannot provide a legally sustainable reason for these closures.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17577-2	Wayne Y Hoskisson		The other urgent need in management is controlling off road vehicle use. Except under tightly controlled conditions ORV use is destructive of monument values. Arch Canyon should be closed to motorized and mechanized uses.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
1768-1	William Hawley 3150 Far Country Dr Moab, 84532		This proposal would close 16+ strips currently in use. These airstrips have been used by many of us, our families and our friends for 70+ years. Generations of aviators have responsibly used and treasured them. The areas involved and therefore the impact of the airstrips is very small compared to the many roads in Bears Ears. They are historically important because they allow pilots to use and access areas that would otherwise be difficult get into. Many of us pilots are getting on in years and may not be able physically to get to the sites any other way. We have been working as a group in coordination with many agencies to maintain these strips for all to use. It is difficult to understand why is needs to be changed after some many years of success. The strips also serve as a valuable resource for search and rescue. Some of the strips can be accessed by vehicles and OHVs. The draft RMP states that aircraft meet the definition of Off Highway Vehicles (OHV). OHVs are allowed to travel on any OHV on designated routes that sometimes go across and down the airstrips. However, by limiting aircraft takeoffs and landings to only Bluff and Fry Canyon, aircraft are being unfairly denied the same recreational opportunities as other OHVs. This makes no sense. There are many more OHVs than small backcountry aircraft. The impact from the noise of the OHVs is much more significant than that of aircraft. Aircraft of all types fly over Bears Ears all the time. The proposal provides no way to change that. The landing of aircraft involves only small amount of noise that lasts only the 5 minutes during the take off and landings. The reality is that small aircraft have much less of an impact to others "soundscape" experience in the Bears Ears than OHVs and other vehicles. I have never heard anyone complain about the noise that originated from backcountry aviators recreating responsibly. I hope that you will consider my comments and change the proposed regulations to allow for the fair and equal treatment for the use these valuable strips.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1770-1	Sam Patrick		While I would agree with you if you said these airstrips do not see a large volume of traffic, I believe maintaining their status as open is important for many reasons. Southern Utah and the surrounding area have an incredibly rich history, some of which would not have been possible without light aircraft operating in the region, while forward progress is important, preserving history is paramount. Much of the beauty of the area, and what makes it so special is how difficult it can be to reach. Every pilot that I know, myself included, utilize these airstrips for access to the area; not for a neat entry into our log books. Along that note, safety is an often talked about factor in aviation. Having these airstrips open and published may offer safe haven for an aviator in trouble in otherwise quite hostile terrain. Keeping one aircraft and its occupants safe is worth it. I understand that aircraft fall under the definition of an OHV. While side-by-sides, four wheelers, jeeps and other wheeled vehicles will maintain access to the area, why would we exclude an aircraft when they make the smallest impact on the very land we are trying to preserve? Build a mile of road, you may drive a mile. Build a mile of airstrip, you may go anywhere. My personal use of this area, and the airstrips in question is incredibly special; my now wife and I have made lifetime memories admiring the beauty of the land and sky here. We even spent a night camped next to the airplane here on our honeymoon, enjoying the solace and nothing more than each others company. Something that would have been impossible if these airstrips were not accessible.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1776-1	Anant Asthana 7186 Nutree Drive Cottonwood Heights, 84121		Aircraft provide valuable observation, monitoring, search and rescue and surveying tools into remote area. They help these remote areas remain well observed with minimal impact. Airplanes have lower impact than land based vehicles since they only need a short patch of runway rather than a long continuous road. The airplane noise isn't significant in comparison to other trucks, cars, semis etc.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17847-2	Margaret Stone		Off road vehicle closures need to be expanded to protect sensitive wildlands, lands with wilderness characteristics and archeological sites. Some areas such as Arch Canyon need to be totally closed to motorized vehicles. It has a high density of Monument Objects ranging from archeological to ecological to threatened species. The damage done by one motorized vehicle can be many times that of a dozen of people.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
1796-1	Ron Adams		Heard someone there has had the incredibly inane idea to close a number of your airports. This citizen says "Don't do that", and respectfully requests your rationale for doing so.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17974-1	Brad Schuster 601 Pennsylvania Ave NW, 250 Washington, 20004	Aircraft Owners and Pilots Association (AOPA)	Backcountry aviation enthusiasts are thoughtful stewards of airstrips on Federal lands wherever they are. For instance (and according to the Utah Backcountry Pilots (UBCP) organization), in the past 70 years, there has not been a single noise complaint due to aircraft operations in the Bears Ears Monument area. Any noise from aircraft is transient and of short duration, in fact peer-reviewed research substantiates the fact that small aircraft noise has no detrimental impact on wildlife.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1799-1	Kevin Deutscher 2222 West Frye Road, Apartment #3018 Chandler, AZ 85224		The airstrips are unobtrusive but provide critical infrastructure that can provide a myriad of services for users in the area. That is why they came into existence in the first place. Land management, emergency evacuation, staging areas for relief and support of native residence. Remote camping locations not requiring creation or maintenance of roads and trails.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
18046-1	Jason Taylor		I would ask to please select a plan that keeps as much of the area open as possible, including not closing roads and trails. When the monument was first announced years ago we were told that there wouldn't be trail/road closures and that we'd still be able to access this area.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSA's, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis.
18189-1			Please do not restrict access for aircraft into Bears Ears! Light aircraft which are the only type able to operate at these remote strips are much less invasive than other vehicles which could impact this pristine bit of wilderness	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1827-1	Madeline Smith		I'm writing to express my strong support for maintaining backcountry aviation access within Bears Ears National Monument. The proposed limitations on airstrips would unfairly restrict recreational opportunities and overlook the minimal impact of aircraft on the environment. Backcountry airstrips play a crucial role in providing access to our public lands for recreational activities, emergency services, and fire fighting. They also promote responsible use practices and alleviate pressure on dispersed camping sites. I urge the BLM to reconsider these limitations and collaborate with organizations like the Utah Backcountry Pilots to ensure continued access for all users.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
1841-1	Bruce Latvala 2438 N Parkwood Lane Wichita, KS 67220	Recreational Aviation Foundation	I am writing to express my support for allowing access by private, non-commercial, fixed-wing aircraft to the airstrips within the National Monument in addition to Bluff Airport and Fry Canyon. As an active general aviation pilot and outdoor enthusiast, I believe this access is crucial. Access by general aviation aircraft for private, non-commercial use helps protect the objects and values of the National Monument. The ongoing use of these airstrips over the past 40 to 70 years demonstrates their importance as recreational assets by supporting dispersed primitive camping. These airstrips offer a unique way to experience the natural beauty of the backcountry with minimal environmental impact. Aviation has one of the smallest environmental footprints compared to other forms of access. It requires no road infrastructure and eliminates miles of dusty road traffic, which reduces soil disturbance and erosion. The noise generated by aircraft is transient and of short duration, causing minimal disruption to the natural soundscape. Airstrips serve as trail heads. Aviators are non-motorized recreational users. Once landed, they participate in hiking, camping, and other low impact activities while practicing leave no trace ethics. Most Utah backcountry airstrips predate the 1964 Wilderness Act. Their historical significance and continued use should be preserved. These airstrips also play a vital role in providing access for search and rescue operations, emergency response, and firefighting, which are essential for the safety and preservation of the area. Allowing access to the other 16 airstrips by private, non-commercial, fixed-wing aircraft will ensure that the tradition of	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			responsible and sustainable aviation use continues. It will also provide pilots and outdoor enthusiasts with the opportunity to enjoy and protect these magnificent landscapes. Thank you for your consideration. I hope you will support continued access for general aviation aircraft to these valuable recreational resources.		
18417-1	Sol Lothe Taos, NM		Having read through the draft RMP, it appears that only the Bluff Airport and Fry Canyon Airstrip are specifically mentioned, although based on further research of the airstrips within the bounds of the Monument, there are 16 other airstrips that have been in place, documented and labeled on Department of the Interior maps, and in use since the 1950s, that would essentially be closed down under all Alternatives except Alternative A. Given that these airstrips are already in place as part of the infrastructure within the Monument, it seems counter to the desired outcome of inviting use and enjoyment of the Monument to close down access to them and that there is likely very little to no impact on the Monument from airplanes landing and taking off at these locations. I would think that these existing airstrips would be part of the world-class outdoor recreation opportunities referenced within the Presidential Proclamation, and given their existence and use for the last 70 years, perhaps even a component of the historical use of this land. Back country aviation is just as much of a unique experience of this beautiful Monument as Rock Climbing, Rafting and other activities that are more generally accepted as ways to experience such landscapes. The ability to access these areas by airplane, the macro-scale birds-eye view, and the fact that there are already existing historic airstrips in place, provides a unique and low-impact opportunity to experience backcountry areas without the physical impact that roads and trails would have on the monument.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
18417-3	Sol Lothe Taos, NM		I would also ask you to consider the airstrips as assets to the Monument in that they allow potential access to areas otherwise potentially inaccessible or hard to get, and could be used in the event of firefighting, search and rescue activity, etc. By keeping these airstrips open and regularly accessible to public aviation, it would keep these airstrips in regular use and observation by the backcountry flying community and help keep them from dilapidating into an un-useable or unsafe state and preserve the ability for future use. My brief interaction with the backcountry aviation community leads me to believe that they are an asset rather than a detriment: there seems to be a deeply instilled culture of leave-no trace, respect and care for the airstrips and environments in which they fly, and a willingness to put their aircraft and piloting skills to use in assisting others when called upon. I would ask you to consider that keeping these 18 existing airstrips open and accessible to public aviation use would be a benefit to the Monument, and not a detriment to the objects for which it was designated.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1858-1	Justin Hodges		I am writing to express my deep concern regarding the draft Resource Management Plan (RMP) for Bears Ears National Monument, specifically the limitations it proposes on backcountry aviation access. As an avid enthusiast of backcountry aviation and a passionate advocate for responsible recreational use of our public lands, I believe it is crucial to address the points raised in the RMP that unfairly restrict aviation access. Firstly, it is imperative to acknowledge the historical significance and longstanding presence of the airstrips within Bears Ears National Monument. Many of these airstrips, dating back to the 1950s, have provided essential access to our public lands for decades. Limiting access to only Bluff Airport and Fry Canyon Airstrip would unjustly deny recreational aviators the same opportunities afforded to other outdoor enthusiasts, such as those utilizing Off Highway Vehicles (OHVs). Furthermore, the assertion that aircraft are equivalent to OHVs fails to recognize the distinct characteristics of aviation, particularly the minimal noise signature and indistinguishable impact on the surrounding environment. Backcountry aviators adhere to strict guidelines of responsible use, including the principles of "Leave no Trace," and contribute to the preservation of our natural landscapes. Airstrips not only facilitate recreational activities but also serve as vital access points for emergency services, fire fighting, and rescue operations. Their importance cannot be overstated, especially in remote areas where alternative means of transportation are limited or non-existent. Additionally, airstrips alleviate pressure on dispersed camping sites, promoting sustainable land management practices. I urge the BLM to reconsider the proposed limitations on backcountry aviation access and to recognize the collaborative efforts of organizations like the Utah Backcountry Pilots (UBCP) in preserving and maintaining these historic airstrips. By working together, we can ensure that aviation access remains open and accessible to all users of Bears Ears National Monument, while preserving the integrity of our public lands for future generations.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. OHVs are defined in 43 CFR 8340, and include motorized aircraft when not in one of the excepted categories (i.e., emergency use, authorized use).
18708-1	Heidi Blankenship Blanding, UT 84511		Although I support the closure of Arch Canyon to motorized vehicles, I wonder if it would be possible to meet motorized users half-way by establishing a use zone with a single designated campsite in the canyon for motorized vehicles in the same way that there are backcountry vehicle campsites in certain areas of Canyonlands National Park. Visitors would have a restriction on the number of vehicles per party (say, 5 vehicles per day) and a combination gate could be applied for access. Portable, washable toilets and a fire pans could be required and the cost of the campsite could offset the cost of maintenance. Or, if not camping, perhaps motorized use could be limited to 5 vehicles per day, only to the lower end of the canyon (closed a mile before the USFS boundary, for example). If motorized use is not eliminated, it should be strongly limited and monitored to protect resources, and no commercial use or events should be allowed.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. Solutions such as those proposed by the commenter could be considered during implementation level travel planning.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18965-11	Simone Griffin	BlueRibbon Coalition	Arch Canyon road is probably the most sought after road in all of Bears Ears and southeastern Utah. It has provided access to observe nature and culturally significant sights for generations. The BLM has already analyzed Arch Canyon road many times in recent years showing the purpose and need for access, motorized and outdoor recreation. Time after time the BLM has found the purpose and need of the road is greater than any insignificant negative impact on the environment. The BLM should adopt the 2020 management plan in the future management of Arch Canyon road. Closing this route will have many cultural and economic negative impacts.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon.
18999-1	Alan Peterson		Unfortunately my wife and daughter don't share my physical abilities to hike long distances, nor the they share a desire to sleep on the ground, filter water and eat freeze dried meals for multiple days Which brings me to the point of this letter to you. I ask, no...I BEG you to allow motorized travel through Arch Canyon to the Forest Service Boundary-End of Road near Cathedral Arch. My wife and daughter are like so many others....they simply can't walk long distances.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon.
2993-1	Mike Nemeth		Keep all of the Bears Ears National Monument airfields open to visiting pilots. Im a second generation pilot who enjoys visiting and hiking this and other areas.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3124-1	Timothy Lien 5600 regent Ave n Crystal, MN 55429		Preservation of our freedoms as they pertain to aviation in this country is crucial. Aviation originated here, in a time when airplanes once had nowhere to operate EXCEPT from off-airport; there were none. Our aviation culture is steeped in this heritage of freedom and discovery. Limiting these freedoms would fly in the face of the history of powered human flight and the history of innovation in this country.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3136-1	Chris Laris		Please take into consideration the importance that general aviation provides in order to access OUR public lands. It would at some point be detrimental to operations such as fire fighting, search and rescue and possible in flight emergencies if these airstrips were closed. Having these airstrips open for use is not impactful on the land and are virtually unnoticeable.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3141-1	Bailey Kemp; Susan Keep; Travis Kemp; Sydney Kemp		Regarding the Bears Ears National Monument Airstrips. I strongly oppose the closing or restriction of these airstrips. As an avid back country pilot, I regularly use these and other airstrips on BLM and State land. It is my chosen way to recreate in these area. I am always respectful of other users and do not hop from airstrip to airstrip. These airstrips also serve a vital function for firefighting, emergency situations, and provide access to our public lands for those that do not have the physical ability to reach these remote places.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
3148-3	Christina Bauer 1016 Boylan Road Bozeman, MT 59771		Closing Arch Canyon to motorized vehicles is perfect, but only a start. Again, please eliminate or greatly reduce OHV use as it destroys the ecosystem, as well as the experience for hikers and campers.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSA's, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources and Geology section in Chapter 3 for a discussion of impacts of OHV designations on paleontological resources.
3417-1	Julie Boatman Yeates		With the minimal noise and environmental impact and maximum effect that light aircraft can achieve in backcountry access, I implore those making the decisions about conserving these resources to consider carefully how we might retain the access we have, and improve it if possible to achieve joint conservation and recreational goals.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

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					aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3421-1	Pierre Redmond		Keep Utah's backcountry airstrips open! Light backcountry aircraft provide highly efficient and low-noise access to remote areas of Utah. America's public lands belong to the American public and should be kept open to us.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3429-1			Please keep Utah Airstrips open. General Aviation pilots use these strips and are an intricate part of the tapestry and history of the area.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3461-1	Jake Akin		I would like to express an opinion regarding the provision of the Draft Resource Management Plan and Environmental Impact Statement that relates to the closure of 16 airstrips in the Bears Ears National Monument. As both a user of public lands and a pilot who flies the backcountry, I think the closure of these strips is quite literally ground lost that is unlikely to ever be regained. This may seem insignificant, but it is detrimental to a population of people whose use of these lands is predominantly through aircraft. Not only do these strips provide access for rescue services, etc that can serve all in the park, but they are a critical access point for many who want to enjoy park access via aircraft.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3622-1	Rob Calkins		I am writing this comment to encourage you to keep the Bears Ears air strips open. I have used them many times over the years and they are valuable means to explore a beautiful area. Most have been in use for many years with no conflicts. If you shut them down you will remove a valuable asset to the area. Again, please keep them open.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3846-4	Jean Naple		Please understand that I support Alternative Es closure of Arch Canyon to motorized use and Alternative E should expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
3861-1	Jennifer C		Please keep public airstrips open. Keeping these spaces ensures our nation's INCREDIBLE general aviation system available not just for current flyers but our newest generations of fliers that are only just beginning to include miorities! Being able to fly into hard to reach places makes safe and quick emergency relief possible. Having open airports for safe landings ensures we have places to land in emergencies where we do not endanger lives including our own. Airstrips are a treasure that simply cannot be quantified in dollars. Every year airstrips are erased in large quantities never to be replaced. Don't take more, let general aviation continue to thrive.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
5443-2	Chris Wheeler 4275 E White Way Salt Lake City, 84124		Also, the more remote an area is, the more important it is to have functioning airstrips to gain emergency access. Emergencies are guaranteed to happen, hikers slip, OHVs flip, snake bites or heart attack the list goes on. How nice to have an airstrip when your life depends on it.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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					Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
551-3	Matt Webb 134 Puma Pl Clifton, 85533	University of Arizona	The EIS states that there would be regulations against riding vehicles near riparian areas (BENM EIS Draft Vol. 2, pg 521) however, there should be more limitations than that. Off-road vehicles can cause immense soil compaction, vegetation destruction, and can even introduce seeds from invasive species (Von der Lippe and Kowarik, 2007). The addition of designated off-roading trails should be designated to BENM. This would reduce the damage done by off-road vehicles and ensure longevity to the park.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	43 CFR 8342.1 instructs BLM to designate all lands as OHV Open, Limited, or Closed. These designations generally apply to motorized vehicles not in official or emergency use (see 43 CFR 8340 for exceptions). Under the Limited designation, the standard limitation is limited to designated routes, with the potential for adding additional limitations including but not limited to season of use or type of vehicle. Under the OHV Closed designation, no OHV use is allowed. Under the Proposed Plan, there are no OHV Open Areas on BLM lands.
614-2	Larry Ellertson		The concern I have is the ability to maintain motorized access. Part of the challenge that I see is that I see my interpretation of BLM's mandate is to manage the public lands for the enjoyment and benefit of the public. Some of the public will never be able to access it if they can't use motorized access, and it seems to me that's an important concept that needs to be kept in mind on any of these land use plans.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
6265-2	John Grunsfeld		I also strongly support maintaining public access to the monument, as it is a resource for all Americans. This includes keeping access to the many backcountry airstrips currently in the Monument. If there is a need to close or limit access to any one or more of the backcountry airstrips, they should be evaluated with a deliberative and public process on a case by case basis. These airstrips provide for search and emergency response in addition to the public access, and often it is volunteer pilots that help out in an emergency.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
6297-1	Bryan Painter		Please do not restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode, and these strips have been open for many decades without incident. Access to the backcountry out west is being restricted on a daily basis. What good is creating all of this wilderness if no one can enjoy it? Public land should be available to the public! I've been to several of these airstrips and have used them to access trails and activities in the area. We need to keep these airstrips open!	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
648-1	Bruce Hilyer		Please keep the historical back country airstrips at Bears Ears and do not close them. The adverse impacts are minimal and people need practical ways to access the wilderness. More access means more support for maintaining the entire BE Wilderness.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
659-1	Jane Mooney 4648 Willow Pass Oregon, WI 53575		My husband and I are general aviation pilots. We would like to see BENM delay ANY airport closures pending review of each one for use, benefit to the local community and need for search and rescue operations.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
668-1	Robert Dyke		Please do not close any of the airstrips in Bears Ears National Monument. These air strips have been in use for many decades, and have brought countless hours of joy to Backcountry pilots and their friends and families.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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669-3	Mark Banks		There should be no closure of any of the Bears Ears airstrips until the correct and proper process has been followed for each and every airstrip. Closing these airstrips essentially stops access to public lands. Arbitrary closures are not in the best interest of anybody and puts the BLM in conflict with long standing land use without due process. 40-70 years of pre-existing use should not be set aside in such an egregious manner.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
674-1	John McKenna 110 Churn Creek Drive Bozeman, MT 59715		My wife and I would hope that we can continue to enjoy these special places for years to come and further hope that aviators of the future have the same opportunity we did.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
675-1	Glen Cowick		Please keep access to backcountry airstrips open to the public. General aviation aircraft have a very small footprint.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
677-2	Jerome Cain 1679 Lone Point Drive, PO Box 1057 Lincoln, MT 59639-1057		I would not be able to continue enjoying these wonderful and beautiful natural resources. I totally agree with all of the following points for the preservation of all backcountry airstrips. Please do not close any of the 18 airstrips involved.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
679-1	Robert Boerner 437 Hillsmont PI El Cajon, CA 92020		I would to voice my opposition to the closure of remote airstrips in the Bear Ears National Monument. My wife and I enjoy to travel and camp with our small, privately owned fixed wing aircraft. As my wife has Multiple Sclerosis, our ability to access remote locations by car and hiking is non-existent. By utilizing our little airplane, we are are to continue to enjoy the beauty of the National Parks, especially those in Bears Ears NM. As these strips have been in existence for so many years, we would be heartbroken to see our access to the backcountry eliminated. Please keep our wishes in mind when considering to limit aircraft to only Bluff and Fry Canyon airstrips.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
681-1	Pat Fagan Paulden, AZ 86334		I am a member of both the Utah Back Country Pilots Association and the Recreational Aviation Foundation. Both organizations are very active providing maintenance for these airstrips further benefiting the land without requiring resources to be provided but the BLM. Allowing continued use of these airstrips, which have been in use for decades, costs the government nothing, while the volunteer labor provided by the using parties is a free resource that benefits everyone. Please don't limit our access.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
706-1	Deborah Moseley 516 Rangeview Ave Homer, AL 99603		Access by airplane to all existing airports in Big Ears should continue to be allowed. Please do not close any of them. Historically closed airports are never reopened. The value of aviation to our economy is important even in the form of fuel, food, entertainment, tie downs, maintenance. Access to remote locations by airplane is one significant reason our free, vast and beautiful country is so special. Please let us continue to have access so that this generation as well as future generations can experience this treasure by airplane.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

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					aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
713-1	Scott Oakley 221 Saint Marys Rd ESSEX, MD 21221		I write to request that you do NOT restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode, and these airstrips have been open to the public for many decades without discernible impact.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
714-1	Chad Jensen 629 Crescent Dr Hollister, 65672		I am writing to express my strong support for keeping the 18 airstrips open and in use within the [National Monument Name]. As an avid pilot and outdoor enthusiast, I believe that maintaining access for private, non-commercial general aviation aircraft is crucial for protecting the objects and values of the monument. 1. Historical and Recreational Use The airstrips in question, including Bluff Airport and Fry Canyon, as well as the other 16, have been used for private, non-commercial, fixed-wing aircraft for recreational purposes for the past 40 to 70 years. These airstrips have become essential recreational assets, providing dispersed primitive camping opportunities, particularly as backcountry use by "boondocking" road vehicles increases. 2. Minimal Environmental Impact General aviation has a minimal environmental footprint, offering the lightest impact form of access to these lands. Access by air requires no roads or infrastructure such as bridges or corrals, and it eliminates miles of dusty road traffic. Additionally, noise from aircraft is transient and of short duration. 3. Historical Significance Many of these airstrips predate the 1964 Wilderness Act, and their historical access and use should be retained. The airstrips are situated on natural flat land features like open meadows, with minimal soil disturbance or erosion. 4. Emergency Access These airstrips provide vital access for Search and Rescue, emergency response, and firefighting. They also offer potential life-saving options for small aircraft experiencing mechanical issues or deteriorating weather conditions while flying over southern Utah's unforgiving terrain. 5. Impact on Wildlife Peer-reviewed research has shown that small aircraft noise does not have a detrimental impact on wildlife. 6. Access for All Backcountry airstrips offer recreational access to the disabled and those with limited mobility, allowing them to enjoy our public lands without strenuous physical activity. 7. Low-Impact Recreation These airstrips serve as trailheads for non-motorized recreation, including hiking and camping. Aviators practicing "Leave No Trace" ethics engage in these low-impact activities. 8. Cooperative Maintenance The Recreational Aviation Foundation and the Utah Backcountry Pilots work in collaboration with the BLM and USFS, providing cooperative maintenance of these airstrips, thereby saving administrative resources for other uses. Given these compelling reasons, I urge the BLM to keep these 18 airstrips open and accessible for private, non-commercial aviation use. The continued use of these airstrips will help preserve the unique qualities of the National Monument while providing essential recreational, historical, and emergency benefits to the public.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
716-1	Michael Wardle Cottonwood Heights, UT 84121		I am writing in support of maintaining currently open airstrips within the Bears Ears National Monument. These airstrips create minimal impact on the resource, but provide tremendous opportunity for the backcountry pilot community, including providing resources in the event of emergencies. Specifically, the Clay Hills Airstrip provides access for the San Juan River takeout, which is a remote area. As both a pilot and rafter, this is a critical-use airstrip.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
720-1	Riichard Leduc		Consider keeping all existing backcountry airstrips within the Bears Ears National Monument open and accessible. These airstrips have little environmental impact in comparison to other modes of transportation yet offer an array of benefits for accessing, maintaining and protecting this beautiful area. Wilderness strips have a proven record of providing benefits while having little to no detrimental effects in remote areas. Backcountry airstrips are portals for rapid intervention in case of medical emergencies or for natural disasters such fire or floods.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
723-2	Jay Malsby		Please do not close any of the airstrips in the BENM! These airstrips have been in use for almost 50 years. I use my small airplane to access trailheads and isolated areas to then go hiking.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

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					aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
725-1	Cenk Ozer		Please preserve our runways and airports. We love flying and contribute millions dollars in local economies by doing it. These runways are also emergency landing spots for us.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
7255-1	Brad Blackham		Aviation access should remain open to every current airstrip in the Bears Ears. This is public land and should remain open for all of general aviation to explore and enjoy.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
727-1	Rex Maurer		Do not close the airstrips. They provide unique and wonderful aviation experiences and enhance more flights and more GA revenue.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
730-1	ERIC TAYLOR		It is my understanding that the proposed plan will in essence close a number of back country airstrips within the BENM. I am opposed to this for many reasons: As a pilot, these airstrips are most likely the way I would choose to visit BENM. Access via airplane is one of the lowest impact "leave no trace" ways to utilize the area' avoiding wear & tear on roads, bridges, and other expensive & hard-to-maintain infrastructure. Additionally, access via these airstrips tend to spread out users instead of concentrating them at road-accessible campsites. Most of these airstrips have been in existence for many years, and pre-date the 1964 Wilderness Act. These back country airstrips can provide recreational access for those with disabilities and limited mobility. I understand that the Recreational Aviation Foundation & Utah Backcountry Pilots organizations are willing & eager to partner with BLM in maintaining these airstrips, freeing up precious public funds for other important work. In conclusion, please do NOT close these BENM airstrips.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
732-1	Kent Holsinger		I was surprised and disappointed to learn to many airstrips could be closed as a result of the Bears Ears National Monument expansion. Namely, I may never get to experience: Browns Rim, Fry Canyon South, Sipapu Bridge, Deer Flat, Dry Fork Canyon, Hammond / Kigalia Point, Mule Canyon, Red House Spring, Dark Canyon North, Dark Canyon South Fry Canyon, Long Canyon, Clay Hills Crossing, Lockhart Basin, Lockhart Road, Polly Mesa, and Valley of the Gods. Backcountry aviation is a significant part of the history of this important area. It is a multiple use which should not be denied. Many aviators enjoy these airstrips and help maintain them. I hope to visit them and to volunteer my time to make sure they remain open. Please recognize and protect these important airstrips in any upcoming decision. Preserving and protecting public access to public lands and dispersed opportunities to recreate such as this should be paramount.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
734-1	Virgil Davis		As the BLM reviews its draft of the Resource Management Plan for Bears Ears I want to encourage you to modify this draft to continue to allow our access to the 18 backcountry strips in Bears Ears. The current draft that restricts our access to Bluff and Fry canyon airstrips would have the practical effect of prohibiting use of 16 other historic airstrips, some dating back to the 1950's. Rather than restricting historic access the BLM should encourage the continued public use of public lands. Airplane use of these airstrips has negligible impact on our public lands. There is no impact to and from the airstrip on the ground unlike any other traffic (foot, bike, horse, OHV all create more impact than our airplanes). The noise signature of general aviation aircraft is minimal and only even able to be heard briefly and in close vicinity to the airstrips during take off and landing.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
741-1	Judd		The foot print left by backcountry aircraft is very small and it is the only way I can enjoy these areas as I can no longer hike in. In addition if someone has an emergency these airstrips are often the fastest way to get aid, at these times the airstrips are invaluable.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43

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					CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
745-1	Lynn ALLEY 3779 S 400 E BOUNTIFUL, 84010		I am a pilot that frequents back country airstrips across Utah, and uses them for recreational purposes. Without these airstrips, I would not have the same access to outdoor activities on public lands that I and my family enjoy now. As you consider the Bears Ears Draft Resource Management Plan, I respectfully request that aviation continues to be explicitly identified as a valid mode of access for use of these lands. I believe that existing back country airstrips provide one of the least impactful ways for people to access the Bears Ears area. Noise signatures for small airplanes are relatively low and transient – generally of much smaller duration than for surface vehicles. Since surface operations are limited to the existing strips, there is no additional erosion, maintenance costs, or wildlife trail disruption that is associated with roads and vehicle trails. In addition to recreational purposes, these airstrips also serve as trailheads for those who provide emergency life-saving, firefighting, and rescue operations. The Utah Back Country Pilots Association (UBCP) has over 25 years of working history with the BLM and other government agencies. UBCP has established protocols (such as Leave-no-Trace) for the use of the airstrips, while organizing efforts to maintain them without any use of public resources through volunteer efforts and privately raised funds. Please continue to work with UBCP to ensure that Utah's back country airstrips remain open and continue to serve as low-impact recreational and emergency access points to BLM lands in Utah.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
7474-1	Whitton Feer		I am writing regarding the potential closure of 16 airstrips within Bear's Ears National Monument. This monument is an incredible public resource, and the airstrips do not threaten that. The small planes that land in the monument have little impact on the area and do not pose a threat to the ecosystem. The airstrips have been there for decades, long before the designation, and are not at odds with the goals of the monument. Closing these airstrips would negatively impact many, for the benefit of nobody.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
760-1	Raymond Lee		backcountry strips can be essential to conducting scientific work and providing medical assistance. These are remote areas with little surface transportation infrastructure. During periods of inclement weather, it is often not possible for residents of remote villages to access food or medical care. I encourage you to more carefully consider the impacts of these closures and choose another alternative.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
764-1	Stacy DeWitt		No one takes care of the land better than pilots. Please keep the airstrips open!	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
790-1	Buster Delmonte Morgan, UT 84050		At 57 I'm a Utah resident and the proud owner of a Cessna 180. I enjoy taking my 5 grandkids flying and there's nothing like a trip to the backcountry. I'm an active member of the Utah Backcountry Pilots Association and testify that my fellow pilot members are true professionals that actively protect these airstrips through voluntary rehab and cleanups. We practice leave no trace behind and common courtesy of fellow users. Much like the grandfathered airstrips of the Frank Church Wilderness Act in the 1960's, I pray that future generations can also access all established strips; specifically those in the Bears Ears NM.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
791-1	Kynan W		Keep the airstrips open and propose a truly balanced solution that will not ruin the beautiful access to appreciate these unique spaces.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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					aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
792-1	Kaycee Sargent		Allowing other OHV access and not airplanes unfairly discriminates those of us as pilots. Pilots are 'leave no trace' communities wanting to enjoy all that the outdoors provides. As someone facing losing this access, what is this based off of? Are there specific studies, findings etc that single us put versus othe users (OHVs, kikerd, horses/horse riding, etc?).	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
803-1			As a member of the Civil Air Patrol shutting down these airstrips will be devastating to many Search and Rescue efforts. There are many situations that these can be used for the better and shutting them down aids in none of this	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
813-1	Scott Beeson		Access to this great land via aircraft continues to be a top choice as my family and friends continue to develop our love for this area. I'm appreciative of the small footprint aircraft leave on the land - an airstrip and parking area typically requires just over an acre of land. Compare this to an OHV trail that may serpentine the area for hundreds of road miles. For example, an ATV/OHV trail of only 1.5 miles in length consumes approximately the same surface area of the typical aircraft landing strip. I also appreciate that the overall noise and pollution signature of aircraft is minimized to only those few locations designated for landing. Furthermore, continued emergency access to these remote landing strips is important to all of us who may be overlying the area enroute to other destinations if an emergency or malfunction arises. Due to its negligible impact and criticality to safety, I strongly assert that aviation access continue to be part of the overall plan of the Bears Ears Monument.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8136-2	Nancy Bagley; Charles Bagley 1235 8th Ave West Seattle, 98119		Besides the views and joy of exploration, we were glad for the silence most of the time. But private plane and copter pilots have no regard for hikers and backpackers in these canyons! Whereas commercial planes are always very high, private fliers fly low. The noise is deafening! We even came across a class for fliers, taught by some Montana people, about how to fly safely below the canyon rims! And we have seen and HEARD them doing that. Read the RMP Notice of Intent (8/30/22) 4. Protect and/or restore scenic qualities including night skies; natural soundscapes; diverse, visible geology; and unique areas and features. How are small plane/copter flights compatible with the above Notice? So Alternative E deals with that beautifully – Private plane landings only at Bluff and Fry Canyon! Remember: These strips were almost all created during the uranium exploration era. But the uranium rush is over! The Utah Backcountry Pilots Assoc. claims that, Noise from aircraft is insignificant and transient and short duration as a recreational aircraft flies overhead (Aug 2022). HAH!! Thats not most observers experience. The noise continues for many minutes to a half hour as the plane approaches over our beautiful, but not sound-absorbing lands, circles a few, or many times, and lands. Then it all gets repeated later as the plane takes off! The UPBA site shows a map of airstrips: https://utahbackcountrypilots.org/airstrips/map Comparison of their map with current BENM boundaries reveals that there are 22 strips in or probably in the BENM. Of course the Association is lobbying for increased plane use. And UBPA makes the surprising statement, ... aviators are non-motorized recreationists ...! PLEASE CONSIDER that the vast, vast majority of BENM visitors are in cars at overlooks, hikers and campers in the backcountry, or on horseback. Most have travelled long distances to see our wonderful, American, federal land in Utah; many of them on once-in-a-lifetime trips. Why should a tiny fraction of the public, aviators, have the privilege of damaging these other Americans experience with plane noise??	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
817-1	Alex Ruehle		It's worth noting that organizations like the Recreational Aviation Foundation and the Utah Backcountry Pilots collaborate with the BLM and USFS to maintain these airstrips, alleviating administrative burdens and allowing resources to be redirected to other critical areas. Given these factors, I urge the Bureau of Land Management to continue supporting access to backcountry airstrips for private, non-commercial, recreational use, preserving these invaluable assets for future generations to enjoy.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

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					aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
835-1	Wes Parkinson		I believe youre cutting off a funding source, and a cohort of backcountry enthusiasts by eliminating access to these strips	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
838-3	Wendy Lessig	Recreational Aviation Foundation	Private, non-commercial, fixed-wing aircraft pilots which use the 18 airstrips in the BENM for recreational purposes are dispersed primitive campers that do not require additional infrastructure or support from the BLM, other than use of the airstrip. The BENM draft RMP Executive Summary states that Alternatives D and E would be more restrictive with respect to dispersed camping. As visitation to the BENM increases, more pressure will be put on motorized routes and dispersed camping boondocking availability will become more limited. The BENM draft RMP has not acknowledged that the 18 airstrips in the BENM are assets and that they provide benefit to the BENM and protection of its objects and values with respect to easing the pressure on dispersed camping. Private, non-commercial, fixed-wing aircraft provide some relief to the availability of dispersed camping options in the BENM and reduce the pressure on motorized route use. For each aircraft that uses one of the 18 airstrips in the BENM for dispersed, primitive camping, it reduces the demand for dispersed camping spots that would then be available for other ground-based OHV for dispersed camping. I suggest that the description of this benefit could be added to the BENM draft RMP in the Management Actions for Recreation and Visitor Services, Table 2-19 and this benefit could be considered when choosing among the various BENM management alternatives with respect to aviation.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
839-1	Wendy Lessig	Recreational Aviation Foundation	Thank you for including aviation in the Bears Ears NM (BENM) draft RMP. I offer the following comment about FAA airstrip identifiers. There are pros and cons for an airstrip to have an FAA identifier and the choice about whether to designate an airstrip as public use or private use. I hope that this information will be helpful as the BLM selects among the management options for the airstrips in the BENM. Two of the 18 airstrips in the BENM have FAA identifiers. Bluff Airport is identified as 66V and is listed as a public use airport. Fry Canyon Airstrip is identified as UT74 and is listed as a private or restricted use airstrip. The other 16 airstrips in the BENM do not have FAA airstrip identifiers assigned to them. Airports that are listed as public use and that have an FAA identifier, such as Bluff Airport, are included in the FAA Airport Facility Directory, also known as the Chart Supplement. The Chart Supplement provides information about each public use airport that is important to pilots for safe operation at that airport. Unpaved airstrips which have an FAA identifier that are listed as private or restricted use, such as Fry Canyon Airstrip, are not included in the FAA Chart Supplement. There would be several advantages for each of the airstrips in the BENM to be issued FAA identifiers. Important information about any hazards on or near the public use airstrips could be effectively communicated to pilots. Airstrips with an FAA identifier are shown on aeronautical charts, whereas those without are not. An airstrip which has an FAA identifier is officially recognized as an airstrip. An airstrip with an FAA identifier would be able to be readily located by pilots. This could be important for safety and potentially life-saving for pilots who encounter a mechanical problem or deteriorating weather over the BENM and could use the charted airstrips for a precautionary or emergency landing. The RAF has assisted the Utah Division of Aeronautics, the Utah DNR, and private airstrip owners to obtain FAA identifiers for several unpaved airstrips in Utah. The RAF would welcome the opportunity to assist the BLM to obtain FAA identifiers for the airstrips in the BENM, as appropriate.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Thank you for your comment. Decisions about FAA identifiers is outside the scope of the decision being made under this RMP. As noted, the only airstrips within the Planning Area currently designated as open to use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. FAA identifiers could be pursued if the airstrips were designated as part of implementation travel management planning.
8432-1	Jimmy Anderson		Back country flying has very little impact to the land and arguably less impact than cycling and driving does. The planes noise levels are brief and drastically reduce after take off and landing. There are no tracks left by planes like off road vehicles do getting to remote places. Back country pilots practice 'leave no trace' more than most groups as they too are here to enjoy nature at its finest. There are no reasons to reduce the access to these strips to pilots so please reconsider.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8438-1	Justin Buckingham		Trying to classify an airplane as an OHV is ridiculous. Airplanes have the least amount of impact of anything thats been approved for the backcountry. The only ground it touches is the runway itself. I cannot support the BLMs decision in this and think all airports should be open to all backcountry airplanes. BLM does not have the Publics Best interest at heart, and the thought of trying to restrict a	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	OHVs are defined in 43 CFR 8340 and are provided in the document. OHV does not refer to a specific type of vehicle, such as an ATV or a side-by-side, but instead can refer to various types of motorized vehicles when on or immediately above public lands or waters and when not in excepted categories such as authorized or emergency use.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			vehicle that using airspace is utter nonsense. Focus on the destruction of dirt bikes and four-wheel-drive on the ground before you come to airplanes.		The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8439-1	Colby Sibert		I would like to express my opposition to closing backcountry airstrips in the Utah Bears Ears area. Aircraft have little impact on the environment compared to land based recreation. General aviation is also being chipped away little by little every year by multiple agencies, regulations, and expense. Keeping these airstrips open also provides another means of emergency response for fire and medical use.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8440-1	Colin Logan		I understand there are concerns of the environmental impact of backcountry flight operation, but a dedicated strip keeps airplane use to a specific area allowing the rest of the land to be unaffected by compaction or other. Airplanes are getting quieter as new generations of experimental aircraft are born. I believe keeping our public lands accessible is critical to keeping aviation alive and keeping access available for the safety of our recreational users.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
844-1	Dustin Mosher		I am writing to advocate for the preservation of airstrips and public aircraft access within the lands being designated for the Bear Ears National Monument. This is to ensure the continued access to this magnificent and special area of Public Lands via the uniquely low-impact and accessible means of light aircraft. As a pilot, I have flown across the region multiple times over the years and have landed within the boundaries of the what is now the monument. The existence of these airstrips provides access to the many unique sections of the monument; access that may be nearly impossible without either an exceptionally capable ground vehicle (if OHV trails even continue to exist) or by being an exceptionally fit and mobile wilderness hiker. This access-by-air significantly increases the diversity of individuals who can visit, on the ground, this part of the world. Additionally, these airstrips provide the flying-public's equivalent of a highway shoulder where a car can pull-over - a place for a plane to land when continuing to fly may be hazardous or unwise. The desert southwest presents many weather phenomenon that can force a small plane into a situation where it is better to land and wait for conditions to improve than to try and challenge the weather. Unlike the east, midwest, and costal regions, the southwest is vast and spartan on places to land; these airstrips are that place to pull-over when needed. The historical significance of these airstrips is intertwined in the complex histories of resource exploration, government defense research, and the agricultural industries of the west. The public-private partnership that can exist between BLM and UBCP to enable an effective preservation of these airstrips with minimal cost to the public or resources of the BLM is the right and responsible way to manage the airstrip aspects of this Public Land. Addendum: "airstrips" in this discussion refers to the airstrip listed in the attached PDF as well as any other airstrips which have historically existed in the boundaries of the future monument. Perosnal photos of flying in Bear Ears attached under 'UBCP Bear Ears.pdf'. [Commenter's map refers to Lockhart Basin, Lockhart Road, Dry Form Canyon, Dark Canyon North, Brown's Rim Long Canyon, Dark Canyon South, Hammond, Deer Flat, Fry Canyon, Sipapu Bridge, Red House Spring, Mule Canyon, Polly Mesa, Clay Hills Crossing, Valley of the Gods, Bluff, see map]	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
849-1	Tyler Gleave Ogden, UT	Utah Back Country Pilots Association	I urge the Bureau of Land Management to reconsider any plans to close the airstrips within Bears Ears National Monument. The numerous benefits these strips provide in terms of access to the backcountry, support for the local economy, and the transient nature of any potential noise created make them an indispensable resource for backcountry pilots and the community as a whole. Preserving and continuing availability of these airstrips will not only ensure the enjoyment of countless aviation adventures but also contribute to the long-term economic growth of the region.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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851-1	Joe		I am writing to advocate for the preservation of airstrips and public aircraft access within the lands being designated for the Bear Ears National Monument. This is to ensure the continued access to this magnificent and special area of Public Lands via the uniquely low-impact and accessible means of light aircraft. My personal interest in seeing these airstrip access point remain publicly accessible stems from my background as a pilot and owner of a small, simple, aircraft that is capable of visiting these airstrips, and as a preservationist who believes the historic significance of aviation access to the region shall be preserved, supported, and encouraged. The shear magnitude of the variations of terrain across southeastern Utah is impossible to put to words, and the ability with a small plane to explore the region at a macro level, then land and explore it up-close, is a uniquely impactful means of appreciating these lands. As a pilot, I have flown across the region multiple times over the years and have landed within the boundaries of the what is now the monument. The existence of these airstrips provides access to the many unique sections of the monument; access that may be nearly impossible without either an exceptionally capable ground vehicle (if OHV trails even continue to exist) or by being an exceptionally fit and mobile wilderness hiker. This access-by-air significantly increases the diversity of individuals who can visit, on the ground, this part of the world. Additionally, these airstrips provide the flying-public's equivalent of a highway shoulder where a car can pullover - a place for a plane to land when continuing to fly may be hazardous or unwise. The desert southwest presents many weather phenomenon that can force a small plane into a situation where it is better to land and wait for conditions to improve than to try and challenge the weather. Unlike the east, midwest, and costal regions, the southwest is vast and spartan on places to land; these airstrips are that place to pull-over when needed. The historical significance of these airstrips is intertwined in the complex histories of resource exploration, government defense research, and the agricultural industries of the west. They represent the resilience of the American spirit to use the tools they have to achieve the job to be done. Building a remote airstrip and operating aircraft out of it is not a trivial activity for the faint of heart; it is one of great spirit and ambition that is integral to the American story of the west. These airstrips were built by simple means and tell the story of how simple solutions solved great problems; how bravery and risk-tolerance got the job done; how skill and practice can overcome incredible obstacles. Now, in the era of a National Monument, their purposes for resource exploration expired, they can be preserved as symbols of what ambition can achieve, and continue to serve a meaningful role as aviation access points to the amazing and remote part of the world. The efforts of the Utah Back Country Pilots Association (UBCP) represent the right level of advocacy and intent for these airstrips. The public-private partnership that can exist between BLM and UBCP to enable an effective preservation of these airstrips with minimal cost to the public or resources of the BLM is the right and responsible way to manage the airstrip aspects of this Public Land.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
856-1	Ben Britton		I am writing to voice my concern about closing access to over a dozen airstrips in the BENM. I fly small aircraft and oppose closing any backcountry airports that have existed for over 40 years. These small airstrips provide a great way for aviators to recreate and enjoy our public lands.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8607-1			Aircraft should not be looped into changes being made. Airplanes bring a unique experience and enjoyment for us all to enjoy public land with very little if any impact to the environment. Please consider how much this would affect the flying community.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8612-1	Jason McDowell		Introducing legislation that limits aircraft access would be downright foolish, particularly considering the vast, vast majority of aircraft owners and pilots are responsible and entirely willing to work with advocacy/conservation groups to ensure the natural environment is minimally affected by the presence of aircraft. Please ensure aircraft remain allowed to access such areas indefinitely.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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8613-1	Ferrell Brown		I believe we absolutely need the spaces available for pilots privately. There is.Very minimal impact, in fact we usually leave it better and cleaner than how we found it. We take kids camping, teach safety and conservation.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8619-1			This plan would severely inhibit the use of Backcountry aircraft, which have a minimal impact on the terrain compared to other OHVs. Please consider revising to give provisions to these aircraft.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8620-1	Devin Sirois		Please preserve public access to all airstrips within the Bears Ears National Monument. These valuable airstrips serve as a pivotal "trailhead" to access the area. I believe that with their limited environmental impact, and negligible upkeep costs, aircraft and these airstrips are the best possible way to access this area.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8623-1	Blake Aholelei		As a backcountry pilot who has flown into Bears Ears National Monument, I strongly support maintaining aviation access in the Resource Management Plan. Aviation provides a unique, low-impact way to enjoy public lands. Aircraft have limited noise signatures and minimal environmental footprints compared to other vehicles. Furthermore, airstrips are essential for access and emergency services, benefiting all recreational users. I urge you to preserve aviation access in Bears Ears to ensure these vital benefits continue.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
866-3	Wendy Lessig	Recreational Aviation Foundation	Attached to this public comment is a kml file which contains the 18 airstrips that are within the BENM. The kml format can be viewed on Google Earth or as an added layer to the BENM interactive map that is posted on the BLM ePlanning web site for the BENM project. The kml file shows the airstrip lengths and orientations. Correction: In the BENM draft RPM, page 3-438, Section 3.5.8.1.1, it incorrectly states that there are 11 airstrips on BLM land besides Bluff Airport and Fry Canyon Airstrip. The correct number is a total of 18 airstrips, including Bluff Airport and Fry Canyon Airstrip (both of which are on BLM land), as well as 15 additional airstrips that are on BLM land, plus the one airstrip on that is on USFS land.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Thank you for your comment, Appendix N Affected Environment for Travel, Transportation, and Access Management has been updated to show the correct number of airstrips with a total of 18. The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning.
867-1	Wendy Lessig	Recreational Aviation Foundation	The RAF and the UBCP and their teams of volunteers provide maintenance of backcountry airstrips throughout southern Utah to keep the airstrips safe for use by aircraft and protective of the natural landscape around the airstrips. We request that the recreational use and maintenance by volunteer pilot groups continue to be allowed for the 16 existing historical airstrips in the BENM, in addition to Bluff Airport and Fry Canyon Airstrip. The 16 airstrips are Browns Rim, Clay Hills Crossing, Dark Canyon North, Dark Canyon South, Deer Flat, Dry Fork Canyon, Fry Canyon South, Lockhart Basin, Lockhart Road, Long Canyon, Mule Canyon, Polly Mesa, Redhouse Spring, Sipapu Bridge, Valley of the Gods, and Hammond-Kigalia. The Division of Aeronautics has set aside funds in the ACIP budget specifically for maintenance and improvements at Utahs backcountry airstrips. A copy of the letter from the Utah Division of Aeronautics which expresses support for backcountry airstrip maintenance by the UBCP is attached.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
867-4	Wendy Lessig	Recreational Aviation Foundation	The RAF hopes that the information in the guide will be useful to the BLM to provide a balanced evaluation of the 18 airstrips in the BENM as the BENM decides among the BENM management alternatives. A copy of Recreational Airstrips on Public Lands, a Reference for Public Land Managers is attached.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

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					aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8678-1	Daryn Barney		I am writing to express my support for the preservation of the 16 backcountry airstrips in Utah. As an avid backcountry aviator, these airstrips hold a special place in my heart, providing me with unprecedented, non-intrusive access to our beautiful public lands. These historic airstrips, long established and integral to the region's aviation history, offer a unique way to experience the wilderness. Unlike traditional camping that necessitates the maintenance of hundreds of miles of roads, these airstrips require minimal intervention, allowing nature to thrive while still offering access to enthusiasts like myself. My use of these airstrips is purely recreational and non-commercial, rooted in a deep respect for the environment and a commitment to "Leave no Trace" principles. By using these airstrips, we alleviate the pressure on increasingly scarce dispersed camping sites. Pilots have the opportunity to camp directly on the airstrip, reducing the environmental impact and preserving the integrity of the surrounding land. This approach not only supports conservation efforts but also fosters a community of responsible outdoor enthusiasts dedicated to maintaining the pristine condition of these areas. I urge you to consider the significant benefits these backcountry airstrips provide, both in terms of access and conservation. Their preservation is crucial for ensuring that future generations can continue to enjoy the unique and awe-inspiring landscapes of Utah.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
868-1	Timothy Cipullo		I am writing to urge that access be preserved to all air strips within Bears Ears National Monument, not just at Bluff Airport and Fry Canyon. These air strips enable me and my family to access the natural beauty of Bears Ears National Monument with a very small environmental footprint.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8684-1			As a student pilot from Wisconsin, I believe that shutting out airstrips in these areas has no benefit. Airplanes are generally the least harmful types of vehicles that can be operated on preserved lands. Not to mention, shutting down these airstrips would also decrease the ability to pick up a wounded hiker or bring in supplies to fight a forest fire. Please don't shut down these airstrips as one day I would love to fly out and enjoy the great Utah outdoors.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
8694-1	Barry Wallace		Flying into a remote, uncontrolled airstrip offers access like none other. In addition it is a very low environmental impact means of access. No roads to maintain. No foot trails to maintain. No miles of land traffic and noise to disturb wildlife. No erosion issues or crossing of streams that can disturb fish. A backcountry landing and takeoff is the lowest impact on the environment of any form of transportation. If you want to allow any form of transportation in a backcountry situation then aircraft have the lowest impact and the lowest ongoing maintenance. In fact, many backcountry organizations perform voluntary work on the airstrips. Please consider these facts and keep all backcountry airstrips available to the responsible flying public.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8696-1	Andy Delk		For many of us in backcountry aviation, this area is a sacred area. We were brought here as children with our parents. We now bring our children. The access granted to enjoy our public lands through aviation is one of the things that sets us apart from other countries and what makes our country great. Aviators in general are a responsible group. We offer help when needed. We carry out more than we brought in. We maintain the airstrips to maintain their natural beauty. Our footprint on the surface is without question a much lesser impact than other OHV activities. To restrict access to our group would simply be an unnecessary move. Please do the right thing and keep our public lands accessible by aviators.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8704-1	Ryan Lynch		Closing access to the airstrips in Bears Ears would be a mistake. The longstanding use of public airstrips is part of the draw of visiting these places for people like me. Aircraft leave a much lower impact on the landscape than all other OHVs evident in the fact that aircraft are limited to only airstrips themselves. The maintenance on these airstrips is far less than the maintenance for all the roads and routes that other OHVs use. After landing, the number one way to travel throughout the surroundings of these airstrips is by foot, also producing little to no impact. Moving on from the objective points, I believe that pilots in general are a group more likely to pack out more trash than	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

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			they bring in. Pilots are also responsible stewards of the priveleges afforded to them by flying into these historic airstrips and it would be a disservice to this community as a whole to remove access to these airstrips.		aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8709-1	Jon Stark		My aircraft has far less impact in accessing the backcountry via airstrip over horseback, off road vehicle or even on foot. Im in and out using a much more limited footprint. I personally sleep either inside my aircraft or in a hammock attached to it. No tent or fire ring. Please do not eliminate my ability to visit the Bears Ears wilderness via this extremely low impact method.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8751-1	Colin Graham 90 W. Madison Ave., Suite E-215 Belgrade, MT 59714		Hello I am writing in support of the backcountry airstrip structure within the Bears Ears Nat'l Monument. We have used these airstrips a great deal to access our public lands and they should not be shut down. Small GA aircraft almost no footprint on the land.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8752-1			We must leave the airstrips! Aircraft have very very little impact on the land they fly over and land on. Certainly much less the ground vehicles	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8768-1	Jeff McGraw		I urge you to allow all current airstrips to remain open. Aircraft use is low impact and the BLM land. This land is owned by the taxpayers of the United States and should be available for recreation and enjoyment of it's citizens including the aviation community.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
877-1	Jack Horn 130 Cessna Dr Erie, CO 80516		If ANY of our backcountry strips are closed the results will be obvious that we (physically unable or a little older) will be closed out of these beautiful areas. Please give full consideration to what the consequences will be with ANY backcountry strip shut downs.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8800-1	Steven Morris		Aviation has been a family recreation for years. Losing access to back country airports would be devastating to our family.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
880-1	Mike Spindler		please keep back country air strips open We are in and out with no trace.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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					aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8803-1	Thomas Herbert 265 e 200 n, PO Box 678 Spring City, UT 84662	Utah backcountry pilots association	I would like to go on record as a citizen of Utah and a 22 year military veteran that I want the back country air strip with in the Brears Ears wilderness area to remain open. I am a pilot that uses these facilities. Airplanes use a relatively small area for landing and taking off in comparison to other off highway vehicles. Their operations are for a very short duration as compared to all other ground based vehicles. The impact from aircraft is truly minimal compared to all other vehicles allowed to use this area. Backcountry pilots are respectful stewards of the land keeping their areas clean and maintaining their operations to only the designated areas thus maintaining the surrounding area in the pristine condition they found them in. Maintenance of these Backcountry strips is provided by mostly volunteers from the Backcountry pilot community. I am requesting that these areas that have been in existence for over 70 years be designated as open for continued public use.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8805-1	Randy Hentz		Utah, back country country aviation strps are one of the best and most beautiful places to fly in the country. Our small airplanes have such a small signature on the land. Shutting these strips down would be a huge step in the wrong direction for the aviation and the country.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8819-1	Scott Boling 1440 Blue Ridge Cir Idaho Falls, ID 83402		In regards to the resource management plan for the Bear Ears area, I want to voice my opinion on rhe usage of aircraft. I have visited these airstrips and look forward to sharing with my boys. Aircraft have a minimal impact on public lands so I dont understand why the closures.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8828-1	Grant		The closure of the 16 airstrips is unnecessary as they have minimal impact on the environment, especially compared to the ease of access it allows!	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
883-1	Chris Mccallum		All air strips should remain open they are the only way to get medical attention to people in need and I use these air strips at least once a month they are a part of history that needs preserved not closed to the public they have a very low impact.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Emergency use is excepted from the definition of OHVs under 43 CFR 8340.
8831-1	Anna Antonowich PO Bix 1538 Fort Bragg, CA 95437		Aircraft spend most of the time in the air not driving/taxiing on the ground, unlike most off road vehicles that need to create trails or roads to ride. Including aircraft into the same group as as quad runners, trucks, buggies and motorcycles does not make sense. On land vehicles create damage to the tundra and frighten the animal life. Many OHV areas, especially where folks can set up camp, have trash left by folks. The architecture of the natural landscape is in most cases is indefinitely altered by tire tracks and ruts. Most all back country aircraft landings and take offs have minimal impact on the terrain. The runways looking to be closed provide already established landing areas but provide camping sites for the pilots and guests as well. I urge you to consider the exclusion of aircraft in the decision to limit use.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
8832-1	Jason Cottingham		Aircraft and pilots are being unfairly affected by this proposal. First aircraft shouldnt be considered as OHV because their main operating space is NOT on the ground off highway. Treating them like any other 4-wheeler/dirtbike/UTV/etc is not fair or even logical. Second, and along with one, the amount of time and distance that an airplane DOES spend on the ground rolling is minuscule compared to the other forms of transportation mentioned therefore have a minimal impact on the land, or non existing impact on the land relative to other on land vehicles. This proposal should seriously be reconsidered and should remove the restrictions being unfairly placed on aircraft and pilots.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. OHVs are defined in 43 CFR 8340, and include motorized aircraft when not in one of the excepted categories (i.e., emergency use, authorized use).
8847-1	Jeremy Santos		BLM, please keep this one open for aircraft back country use. STOL aircraft have a much smaller impact on the land than other off road vehicles.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-115	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The environmental footprint of aviation, particularly in these contexts, is notably small. Aircraft do not require the infrastructure such as roads, bridges, or corrals, thus preserving the natural terrain and preventing soil erosion and other disturbances. Airstrips also occupy naturally flat land areas, reducing the need for extensive land modification.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
889-117	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	It is also critical to recognize that most of these backcountry airstrips predate the 1964 Wilderness Act and have coexisted with the natural environment without causing significant disruption. The noise associated with aircraft is transient and has been shown by peer-reviewed research to have negligible impact on wildlife. Furthermore, these airstrips offer critical recreational access for individuals with disabilities and limited mobility, allowing them to enjoy our public lands without the need for strenuous physical activity.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-119	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We urge the BLM to consider these points and to allow the continued use of all existing airstrips at Bears Ears National Monument. Closing these airstrips would not only deprive many users of their historical and recreational benefits but would also undermine the very conservation goals intended to be upheld. We specifically urge the BLM to keep all of the following airstrips open, compiled into a list by the Recreational Aviation Foundation:41 Airstrip Latitude Longitude Documented Existence Year Browns Rim 37.854 -110.299 1952 Fry Canyon South 37.613 -110.139 1952 Sipapu Bridge 37.6255 -110.034 1952 Deer Flat 37.6654 -110.027 1954 Dry Fork Canyon 38.0933 -109.616 1954 Hammond-Kigalia Point 37.6843 -109.773 1954 Bluff 37.2535 -109.636 1962 Mule Canyon 37.4739 -109.71 1962 Red House Spring 37.4815 -110.184 1963 Dark Canyon North 37.89585 -110.089 1980 Dark Canyon South 37.8242 -110.09 1980 Fry Canyon 37.6515 -110.171 1980 Long Canyon 37.7817 -110.159 1980 Clay Hills Crossing 37.317 -110.367 1987 Lockhart Basin 38.3268 -109.706 1987 Lockhart Road 38.3292 -109.681 1987 Polly Mesa 37.3877 -110.124 2006 Valley of the Gods 37.2531 -109.92 2006	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-28	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The road in Arch Canyon is one of the most valuable motorized routes in the Bears Ears National Monument. The Arch Canyon route is used for Jeep Jamboree USA and has been used by Easter Jeep Safari in the past, though I am not certain if it is currently authorized for EJS. This route is extremely important for motorized recreation and we oppose any alternatives that close these routes to motorized use, as both alternatives D and E do. We are extremely disappointed to see this proposed closure in the agencies preferred alternative. This proposed closure is utterly lacking either factual or legal basis, and we strongly oppose its inclusion in the final management plan. The Arch Canyon road allows drivers to explore one of the most scenic canyons in the monument, lined with ancestral puebloan ruins in the striking cliffs above. At the end of the road at the National Forest boundary is a trailhead for the hiking trail into upper Arch Canyon in the Arch Canyon Roadless Area, so it provides	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			critical hiking access as well. The road allows motorists to view the spectacular Cathedral Arch from the parking area at the end of the trail, and provides access to the equally spectacular Angel Arch only a short walk up the canyon. It also provides critical access for people with disabilities who depend on motorized vehicles (whether Jeeps, ATVs, UTVs, or eBikes) to experience public lands.		
889-41	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The motorized routes in Lavender and Davis Canyons are two of the most important routes in the monument. Both of these routes provide access to remote parts of the Needles District of Canyonlands National Park and are the only means for people with mobility disabilities to access these scenic parts of the park. They also provide important access to hikers who wish to hike in the upper canyons inside Canyonlands. If they were closed, hikers would be required to hike an additional 8-10 miles to reach the Canyonlands boundary from the nearest paved road, making the upper canyons impractical for day hiking. Realistically, most people are highly unlikely to want to hike 8-10 miles through deep sand just to reach the trailhead where hikers usually start their hikes now, meaning that most people will simply cease visiting these canyons. While the Davis Canyon motorized route ends at the Canyonlands Boundary, the Lavender Canyon road continues for several miles inside Canyonlands. Motorized access in Canyonlands is managed with a permit system that limits the number of vehicles to eight per day. Because this route crosses agency boundaries, any actions regarding this route must be carefully coordinated with the National Park Service. The closure of this route would severely impact access to Canyonlands National Park and should not be done lightly. Both of these routes generally receive light traffic that is not causing any significant impacts. Both routes are in sandy washes that are scoured by regular flash flooding, erasing any evidence of vehicle use. We note that both routes were evaluated in the 2020 management plan for the Indian Creek and Shash Jaa units, which included an alternative that would have closed both of these routes (along with Arch Canyon) to OHV use. Ultimately the BLM determined at that time to keep them open to OHV use by keeping the OHV Limited designation in these areas, and to make route specific decisions in future travel planning. Nothing has changed to justify reversing that decision and closing these routes only four years later, and we urge the agencies to consider the issue of OHV area designations in these canyons a settled question. We request that the final management carry over the decision from the 2020 management plan to designate Lavender and Davis Canyons as OHV-limited and to allow the existing motorized routes to remain open.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, and based on coordination with the NPS, the routes referenced in the comment are in OHV Limited area to allow for access to important recreational opportunities permitted by Canyonlands National Park. See the Proposed Plan, routes within off-highway vehicle area designation Map in Appendix A.
889-45	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We strongly oppose any action to close the last 0.2 miles of the Chicken Corners OHV route. Given that such a small portion of the road extends into LWC and that this includes the viewpoint at the end which is the primary destination of the trail, it makes no sense to close this portion of the road. We urge the BLM to keep the Chicken Corners trail intact to its end and not to adopt OHV area designations in the final management plan which would close any portion of it.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Thank you for your comment. The Proposed Plan has cherry stemmed the Chicken Corners OHV route out of the OHV closed area overlaying WSR Colorado River Segment 3 (See the Special Designations and Travel and Transportation Management sections in Chapter 2). This is consistent with the requirements for management of WSR suitable scenic, while also allowing for continued use of the popular Chicken Corners route. See the Proposed Plan, routes within off-highway vehicle area designation Map in Appendix A
889-47	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The difficult rated Bridger Jack Mesa 4x4 trail follows the boundary of the Bridger Jack Mesa WSA along a narrow shelf road above Lavender Canyon, connecting from the Indian Creek area to the main Beef Basin Road. It is an extremely popular and valuable OHV route that has been prized by local off-road enthusiasts for many decades. It is featured on the Outsiders Utah trail guide website at https://outsidersutah.com/bridger-jack-mesa-trail/ and the entire route can be seen on Google Street View in Google Maps. The entire route is cherry-stemmed through lands with wilderness characteristics, and much of the route follows the boundary of the Bridger Jack Mesa WSA that was intentionally drawn to exclude this route from the WSA and allow it to stay open. While not closed outright by it, this route is in danger of being closed by alternative D in future travel planning, as the entire area around it would be managed for wilderness characteristics. This route is not causing any significant environmental impacts or harming monument objects and values. This area was already evaluated in the 2020 Bears Ears management plans, which determined that it should retain its OHV-limited designation and that this route should remain open. Nothing has changed in the last four years to merit reconsidering that decision and it should be allowed to stand.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, the Bridger Jack Mesa Road is within the OHV Limited area. See the Proposed Plan, routes within off-highway vehicle area designation Map in Appendix A.
889-5	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The BLM has recognized many times in the past that it offers an exceptional recreational experience and should therefore remain open. The same can be said about the numerous motorized routes that would be closed by the OHV area designations in alternative D, including the end of the Chicken Corners Jeep Safari route, many spur routes off Lockhart Basin, all of the motorized routes in the Imperial Valley area of Beef Basin, and the roads in Moqui Canyon and Mike's Canyon, among many others.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. The Alternatives Considered but Not Analyzed in Detail section in Chapter 2 includes consideration of alternatives aimed increasing motorized access and alternatives that prioritize multiple uses over protection of BENM objects.
889-9	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We are disappointed to see that every one of the action alternatives discussed in the DEIS involve significant restrictions on recreation, and motorized recreation in particular. All of the alternatives would significantly curtail motorized recreation on primitive roads, and alternative D would almost certainly result in hundreds of miles of road closures as most of the monument would be managed as de facto wilderness. All of the proposed alternatives start from the position that recreation is a threat	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The Purpose and Need (Chapter 1) of the Draft RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			to monument values and needs to be curtailed, primarily through route closures, bans on certain activities like drone flying, limiting group sizes, and limiting recreation permits. Of the four action alternatives, both alternatives D and E would be considered conservation emphasis alternatives imposing severe restrictions on recreation, with alternative D going so far as to manage most of the monument for the protection of wilderness characteristics, closing hundreds of miles of roads. While the other action alternatives are less restrictive in some ways, they are more restrictive in others, making them equally unpalatable.		important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape." Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Chapter 2. The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
889-93	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We wish to express our strong opposition to the provisions in most of the action alternatives, and particularly alternative E, that would limit aircraft landings and take-offs solely to the Bluff Airport and the Fry Canyon Airstrip. This limitation, which seeks to close 16 additional airstrips, overlooks the substantial benefits these facilities provide both to the monument and its visitors. First and foremost, access by general aviation (GA) aircraft for private, non-commercial use has historically been an effective way to protect the objects and values of the National Monument. These aircraft impose minimal impact on the landscape while providing necessary access. Moreover, the existing 16 airstrips, which have been used for recreational purposes for 40-70 years, are integral for non-commercial, fixed-wing aircraft. Their continued operation allows for recreation that respects the preservation goals of the monument.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-94	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The severe restrictions on recreation and the mass road closures contemplated in most of the action alternatives simply cannot be justified either factually or legally, and we strongly urge the agencies to reconsider this approach. At the very least, the agencies must fully consider a recreation emphasis alternative which would preserve all existing recreation opportunities within the monument and allow for the construction of new roads, trails, and visitor accommodation facilities to better manage the influx of visitors that national monument status has caused. We strongly oppose additional restrictions on recreation and believe they are ultimately unnecessary, as recreation is largely well-managed within the monument under existing management plans. We urge the agencies to consider carrying over as many existing management policies from previous management plans as possible to minimize the disruption monument designation will cause to all monument users.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The Purpose and Need (Chapter 1) of the Draft RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape." Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Chapter 2. The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
889-98	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The Analysis of Management Situation document published earlier in the planning process claimed without basis, Considerable controversy exists over motorized access within Arch Canyon and will need to be considered as part of the area designation process.13 And because of this alleged controversy both the preferred alternative E and alternative D included in the DEIS would close this road by putting it in an OHV-closed area designation, preventing it from even being considered in implementation travel planning. While the Arch Canyon route was controversial in the past, its designation has been a settled question for the last 14 years since the BLM rejected a petition by SUWA to close it in 2010. The only reason it can be considered controversial at all is because certain environmental groups have been trying to get it closed literally for decades and refuse to take no for an answer. SUWA and other environmental groups have made new attempts to get the BLM to close this route every few years for well over 40 years. They have failed every time because their reasons are and always have been groundless. The new Bears Ears management plan is only the latest venue for these groups to assert their baseless claims against this route, which are rooted solely in irrational prejudice against motorized recreation and have no scientific or factual basis. There is no reason why SUWA should be any more successful this time than they were the last dozen times they petitioned for the closure of this route.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The agencies considered the commentor’s suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. See Chapter 3 for a discussion of impacts to resources and uses from OHV use in Arch Canyon.
8922-1	Tyler Ray		As someone who grew up flying in this area, I am deeply concerned about the proposal to close 16 airstrips to airplane use. These airstrips are vital for accessing and exploring the stunning landscape that defines our region and for preserving the traditions of the backcountry aviator. These beloved airstrips also provide access to these beautiful areas of our country that would otherwise be nearly impossible for those with limited mobility.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8999-2		International Mountain Bicycling Association	We recommend the BLM better consider an outcomes-based approach to recreational access and better provide for appropriate bicycle experiences in this landscape. We recommend that the BLM adopt Alternative B language as it pertains to future bicycle access where the DRMP states: Mechanized travel (e.g., bicycles) would be limited to routes where OHV use is allowed and to trails specifically designated for mechanized use. Allowing for trails to be specifically designated for mechanized use allows the BLM to manage bicycling more appropriately and with more discretion.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan the language from Alternative B has been adopted, (see Section 2.4.21.3 Management Actions by Alternative for Travel Management). Mechanized travel (e.g. bicycles) would be limited to routes where OHV use is allowed and to trails specifically designed for mechanized use.
906-1	Cory Wolf		As a professional and recreational aviator, I wanted to express my support for maintaining, opening, and improving airstrips within this proposed area. These airstrips not only provide an environmentally friendly way to access public lands, but are an invaluable resource for fire fighting, search and rescue operations, and as emergency landing sites in otherwise inhospitable terrain.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
906-2	Cory Wolf		These airstrips not only need to be kept open, but need to be protected as trailheads. Access via aircraft needs to be recognized in the planning process as a legitimate means of accessing our public lands and included specifically in travel plans, especially where many of them have been recognized as airstrips on federally created maps. Some dating back to the 1950s.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9094-1	Corey Jones		Limiting general aviation use of Backcountry airstrips in Utah is prejudicial to public use. These airstrips provide recreational activity for recreational pilots and also provide access for emergency response.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9109-1	Jeff Hadley		I urge the BLM to maintain and support the use of backcountry aviation airstrips within Bears Ears National Monument. These historic airstrips, many established since the 1950s, provide essential access to remote areas for a variety of users, including recreational pilots, emergency services, and visitors with limited mobility. Their existence is crucial for activities such as firefighting, medical evacuations, and safe emergency landings. The noise impact from aircraft is minimal and transient, limited to brief moments during takeoff and landing, and far less intrusive than prolonged ground vehicle traffic. Backcountry aviation adheres to "Leave No Trace" principles, preserving the natural landscape and reducing the need for extensive road maintenance. Additionally, these airstrips help alleviate pressure on dispersed camping sites, which are becoming increasingly scarce. By recognizing and preserving these airstrips in the final Resource Management Plan, the BLM can ensure continued, responsible access to public lands, fostering both safety and enjoyment for all users while maintaining the integrity of the environment.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
913-1	Blake		I am writing in support of the continued access for light aircraft in the Bears Ear airstrip system. These airstrips are a national treasure and closing off access to recreational pilots is wrong. Peer-reviewed research substantiates that small aircraft noise has no detrimental impact on wildlife.	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9150-1	Paul King 2451 NW Broadway St Albany, OR 97321		As an aviator with substantial back country flying experience, I am opposed to the closing of the established airstrips in the Bears Ears region. First, the BLM has unilaterally identified aircraft as an official OHV vehicle in this document. If this categorization holds, it will open the door for continued reduction of the airstrips nation wide that can be used by the general aviation community for camping and recreating. Aircraft should not be lumped into the OHV category: Aircraft do not need roads to get to their destination. Thus, there is no impact from aircraft traveling across land to get to	ALT07-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no

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			a destination. No dust, no perceptible noise, no oil, no junk left from broken down vehicles, frankly, there is no impact from aircraft as they travel to their destination. Since Aircraft dont need roads, there is no need for maintenance of those roads. Most, if not all, aviators believe in leave no trace. I, and certainly the group of aviators I fly with, practice this everywhere we go. As aviators, we believe that we should have the same level of consideration as others using these lands. The BLM should not discriminate against aviators while allowing ATVs to run rampant! As an aviation based search and rescue Wing Commander, my team relies extensively on access to these back country airstrips in the performance of our duties. Closing designated backcountry airstrips is detrimental to the performance of our duties for Search and Rescue operations. Additionally, these airstrips, most of which are volunteer-maintained, provide service access points for fire fighters and other emergency response teams to stage and for a safety outlet Finally, many of the airstrips in question have been designated as such for more than 75 years. The continued erosion of accessibility of the general aviation community to established airstrips will continue to put pressure on the community to find alternatives, alternatives that may not be safe.		designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
917-1	Kurt Goodfellow		I'm writing to encourage you to keep the 16 airstrips in Bears Ears National Monument open for recreational use. I'm sure you've been told the many reasons to keep these strips open, but here are a few of my own: 1. These airstrips are used and maintained by those who truly care about the environment and are dedicated to caring for it. Not a bunch of Off -Roaders who rip around the countryside tearing up the landscape with their side-by-sides, motorcycles, and 4x4 rigs. Pilots are always careful to haul out what they brought in. Very little land is disturbed, especially for the benefit derived. 2. When the hikers and others using this "monument" are injured or otherwise in distress, the airstrips provide a very efficient and safe way to help those in need with out damaging the environment. 3. Isn't the whole idea of the BLM to provide access to OUR lands, managing that access so that ALL can access it while still protecting the environment? These runways have been in existence far longer than most of us have been alive; and conditions at these strips have not changed. Contrast this to the road and trails used by off-road enthusiasts. Every year it seems that these routes decay more and more. There is simply no reason to discontinue access and use of these landing strips. 4. When aircraft use these strips, there is virtually no environmental impact, especially upon the terrain itself. There is some noise on take-off and initial climb, but that's about it. 5. These airstrips have historical value and bring back memories of a simpler time; a time when hearty explorers were searching for minerals, taking care of cattle, and many other valuable pursuits of the day. Now they provide a much needed break from the hustle and bustle of the modern world. With a small aircraft, these places can be accessed quickly and efficiently, with very little disturbance.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
9172-1	Steve Discher		Aircraft make the least impact on our public lands and natural resources. Please do not create any legislation that would close any existing public lands to aircraft.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
918-1	Craig Gustafson 357 W. Ridges Blvd. Grand Junction, CO 81507		I am writing regarding my support for the formation of Bears Ears National Monument and also to voice my support for maintaining access to historical backcountry airstrips within the proposed National Monument.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
918-2	Craig Gustafson 357 W. Ridges Blvd. Grand Junction, CO 81507		As you are aware, many if not all of these strips have been labeled by the Department of the Interior as historical use airstrips from back as early as the 1950's. The strips in question include: Browns Rim, Fry Canyon South, Sipapu Bridge, Deer Flat, Dry Fork Canyon, Hammond / Kigalia Point, Mule Canyon, Red House Spring, Dark Canyon North, Dark Canyon South Fry Canyon, Long Canyon, Clay Hills Crossing, Lockhart Basin, Lockhart Road, Polly Mesa, and Valley of the Gods. Backcountry aviation affords me and my family unprecedented, non-intrusive access to the most beautiful public lands in the lower 48 states, using established, historic airstrips. While other camping opportunities require hundreds of miles of roads to be maintained, airstrips require only the lands that have already been established. Backcountry airstrips also help alleviate pressure on dispersed camping sites that continue to become more scarce, by allowing pilots opportunities to camp on the airstrip.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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9189-10	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Allowing ohvs across the landscape with alternatives allowing up to 50% of the BENM open to their use results in the same impacts to soils as livestock grazing when they leave roads. There should be severe restrictions on ohv use, no cross country travel, adequate enforcement, recognition of their role in climate change, and disturbance to wildlife and quite recreationists.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	There are no OHV-open areas in BENM under any of the alternatives including Alternative A (existing management), meaning that all OHVs are and will be required to stay on designated routes and no cross country travel is allowed. In addition, under the Travel and Transportation Management section of Proposed Plan, 637,615 acres of BENM are closed to OHV use meaning vehicles
9221-3	Eirene Hamilton		I live in a community surrounded by sandstone cliffs that echo and amplify the noise pollution of vehicular and aircraft traffic. Arch Canyon is a canyon habitat and should remain closed to OHV for protection of wildlife and respect for the rich indigenous cultural heritage.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
9223-1			Arch Canyon is spectacular. The best views are at the end of the road and hiking beyond there. Jeeps, OHVs, UTVs carry old people up there. The vast majority just enjoy the scenery that is to be seen from their outfit. Most can't walk a mile, let alone 14. If you close this to vehicles, you deny the best views and the thrill of being in the canyon to 98% of the people who would see it at mile 7. In all the times I have been in Arch Canyon, I have never seen a hiker who walked all the way to the end. I have seen many who went a couple of miles and then turned around. All those canyons listed above have beautiful vistas with cool ruins and are effectively closed to the elderly. This is a travesty. You should not even consider this. It breaks your own rules and denies most of the present users the opportunity to enjoy that beautiful country.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in Arch Canyon would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
9232-5	A Utah citizen conservationist		I support the closure of motorized routes that harm monument objects and values, including those potentially adversely affecting springs, riparian areas, vegetation, soils, and cultural objects. Widespread off-road vehicle use should not be allowed, and no additional routes should be designated.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSA's, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
9253-2	Stephen Trimble P.O. Box 750090 Torrey, UT 84775		I support Alternative Es closure of Arch Canyon to motorized use. I encourage you to expand closure areas to protect the Monuments most significant resources. Motorized vehicles are the biggest threat to cultural sites and the connectivity of protected areas. Compromise is necessary, sure, but damage from off-road vehicles is common, clear, and unnecessary.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
9255-10	Keith Alleman		It would be good to mention concentrating OHV access into appropriate zones consistent with the zonal concept. It would be good to clarify that acreage with OHV limited access would have a trail network and access limited to traveling on those trails that BLM is expressly not picturing a little sahara or factory butte type setup where users can just point their OHV in any direction and go. It is pretty clear about that in the main body of the document, but not in the Executive Summary. The document should mention placing more emphasis on single high-quality OHV trails rather than spiderwebs of highly redundant and poorly defined trails [and maybe it does this, and it just isn't reflected in the Executive Summary... I couldn't find such language, though.]	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The Proposed Plan employs a zoned approach to recreation management. OHV limited definition has been clarified in Glossary.
931-1	Tim Davis 7350 Brightland Street Windermere, FL 34786		Closing public use air strips is never a good idea as they're used by man outdoors enthusiasts to get around to remote areas quickly and safely.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9356-1	Paul Bertuccini		Backcountry pilots have the ability to tread lightly on our public lands. We fully respect and want to honor the ability to do this, but we also dont want bureaucrats getting involved and making things more difficult. We have safely done this for many years, and in many cases, backcountry aircraft tread more lightly because they only use a few hundred feet of space to land and then theyre back off into the air. There is no way that this causes any problems to the lands and it is not justified to lump aircraft in together with other off-road vehicles. We are great advocates of these lands and intend on being very active to protect these lands but also allow us to use them.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9372-28	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Many of the closures lack explanation or reasoning for their closure and give the perception of arbitrary actions. For example, under all alternatives, including alternative A, the BLM has determined that a portion of D1870 needs to be closed. D1870 is a two-track trail that provides lower-elevation access to Beef Basin from Salt Creek Mesa. To close a small portion of it between the steep and technical portions and the flat of Beef Basin has no reasoning or clause. Those riding in from Salt Creek Mesa will find themselves forced to turn around rather than just complete the trek. This is not just useless, but this trail provides access when snow drifts are still present around Horse Mountain. That access can be critical in management and rescue necessities.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The route section in question has been determined to be within the Butler Wash WSA and has thus been within an OHV closed area since the 2008 RMP. The road would remain available for emergency or authorized use under 43 CFR 8340. WSA boundaries are outside of the scope of the RMP/EIS.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
9372-33	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	the closing of Arch Canyon is highly concerning. Arch Canyon is iconic to San Juan County. Guests come to San Juan County to see Canyon Country and archaeological treasures. Arch Canyon is lush with both. It is a whole ecological museum of things to see. This draft plan doesnt provide nearly enough validation to close this iconic trail. ROW grants are expected to continue within the Monument under all alternatives. (mentioned 6 times through the draft plan) The Right of Way for the Arch Canyon trail, as well as all other mentioned, and not mentioned closures, was granted to San Juan County through existing management plans and RODs.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
9372-34	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Additionally, Under all alternatives, BENM would continue to support the local and regional economy through increased jobs, wages, economic output, nonmarket values, and ecosystem services from its uses, such as recreational opportunities and grazing and ranching allotments. (Page 44) As a commercial-use tour operator, the Arch Canyon trail is a large portion of my income. Beyond that, the Arch Canyon trail is a draw for people to come ride their OHVs in San Juan County over other areas in the state, or nearby areas, for people from near and far. The Arch Canyon Jeep Safari, the San Juan Showcase, the Tri-State ATV Club, the Carbon County OHV Club, and the San Juan ATV Safari are a few examples of large groups that come to San Juan County with a nearly exclusive draw to be able to see such a remarkable trail. Those groups, as well as the thousands of private and single-day commercial groups, stand threatened to lose their recreational financial impact on this area if this trail is closed.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. While commercial outfitters may still be able to access Arch Canyon under an SRP, commercial and organized group events such as those referenced in the comment would not be allowed in Arch Canyon under the Proposed Plan (see Appendix E, Supporting Information for Recreation and Visitor Services Decisions). The permit system would be developed as part of the BENM Travel Management Plan in the future.
9372-39	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	One of my big concerns for Arch Canyon is Search and Rescue concerns. As healthy and active as the ecology of the canyon is, without road use, it won't be more than two years before the road will be either washed away or overgrown in enough places that the road will be impassable. The tight canyon with healthy vegetation has limited landing zones for helicopters. The trail also provides access to USFS boundaries, State Trust lands, and rock climbing cracks with growing popularity. The things all require access. When presenting these concerns, I get told that administrative uses could still access the road. However, what is not being considered is the fact of how quickly the canyon washes out or overgrows the ROW. If OHV users dont break the trail open each spring, it will make itself impassable and access to things will be impossible.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon.
9380-1	Alan Armstrong		Restricting full access as it exists today to the Bears Ears area by aircraft is a VERY poorly considered and obtrusive proposal that should be immediately rejected. It is the equivalent of taking an axe to split something you measured with a micrometer. Aircraft provide the only means to access some of these areas in the lowest impact way possible- they do not destroy vegetation or cause erosion. The noise signature is minimal. The pilot community tends to be very conservation focused and you will not find trash, vehicle parts, oil containers, etc left by those who fly in EVER. In fact, we always make it a point to check the surrounding areas where we do fly in for trash and haul it out. In short, aircraft provide the lowest impact and lowest utilized way to enjoy these BLM areas and it would be a travesty to limit that access.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
938-1	Peter Heinrich		I am writing to express my support for the continued and expanded access of private, non-commercial general aviation (GA) aircraft to the National Monument, specifically advocating for the use of the existing airstrips beyond Bluff Airport and Fry Canyon. The preservation and utilization of these airstrips align with the Bureau of Land Managements mission to protect the objects and values of the National Monument while fostering recreational use. The 16 airstrips in question have a long history, with recreational use spanning the past 40-70 years. These airstrips are not merely landing spots but vital recreational assets that support dispersed primitive camping. This is increasingly important as the backcountry experiences heightened use by "boondocking" road vehicles, which place a greater strain on the environment compared to aviation. The environmental impact of aviation is minimal, making it the lightest footprint form of access to these remote lands. Unlike road vehicles, access by air requires no roads, bridges, or other infrastructure, thereby preserving the natural landscape. Moreover, aviation access reduces the miles of dusty road traffic, which can be detrimental to the environment. It is important to note that many Utah backcountry airstrips predate the 1964 Wilderness Act. Their historical usage rights and current access should be maintained. The transient nature of aircraft noise, coupled with its short duration, has been shown through peer-reviewed research to have no detrimental impact on wildlife. Furthermore, these airstrips, situated on natural flat land features, cause minimal soil disturbance or erosion. The strategic location of these airstrips provides vital access for search and rescue operations, emergency responses, and firefighting. They also offer potential life-saving options for small aircraft experiencing mechanical problems or adverse weather conditions over southern Utah's challenging terrain. Additionally, backcountry airstrips play a crucial role in providing recreational access to the disabled and those with limited mobility, allowing them to enjoy public lands without the need for strenuous physical activity. These airstrips serve as trailheads for aviators who engage in non-motorized recreation such as hiking and camping while adhering to "Leave No Trace" ethics. The Recreational Aviation Foundation and the Utah Backcountry Pilots have demonstrated their commitment to maintaining these airstrips in collaboration with the BLM and USFS. This cooperative maintenance effort helps save administrative resources that can be allocated elsewhere. The continued and expanded access to these airstrips by private, non-commercial GA aircraft is crucial for protecting the values of the National Monument, providing	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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			recreational opportunities, and ensuring the safety and preservation of the environment. I urge the Bureau of Land Management to support and facilitate this access.		
9383-1	Jeff Hansen 180 N 2400 W Ste 106, ATTN: Utah Aviation Coalition Salt Lake City, UT 84116	Utah Aviaitoin Coalition	The Utah Aviation Coalition, representing 9 aviation groups inside Utah, is writing to oppose any/all restriction to use of the airstrips in the BEMN per your process of revising the Resource Management Plan. These airstrips inside BENM are vital to our state's aviation community as well as State and Federal agencies for the following reasons, including but not limited to: o Wildfire detection and firefighting support using small aircraft and helicopters o Emergency landing strips for aircraft flying above with mechanical or weather issues o Drug interdiction/enforcement efforts o Law enforcement temporary stations o Search and rescue for lost hikers, hunters, rock climbers, rafters and off-road enthusiasts o Medical evacuation for injured users of this very remote area o Immense recreational benefits for a wide community	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
9383-3	Jeff Hansen 180 N 2400 W Ste 106, ATTN: Utah Aviation Coalition Salt Lake City, UT 84116	Utah Aviaitoin Coalition	Please consider the use of these airstrips as not just playgrounds for Off-Road Vehicles having a fun day, but vital pieces of land that could save human life, direct firefighting equipment to the right area quickly, prevent crime and property loss. With the recreational aircraft use, the BLM/State/Federal agencies, as well as the rest of the public gets free maintenance, intelligence and support for this remote area. The emergency use in support of the public is a direct benefit from the public aircraft use. If use of the airstrips in the BENM is not restricted, Utah Department of Aeronautics is budgeting funds for maintenance and weather reporting stations in the BENM. These weather reporting stations are not just for aviation but all users of this recreational area.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Travel considerations associated with official use and authorized actions (such as for emergency purposes) may be considered during the planning process. the BLM would consider these kinds of uses when determining the purpose of and need for routes individually and as a network.
944-1	Andrew Hopwood		Please do not close these airstrips, I would like to share these places with my kids and family, just like my parents and grandparents did for me. The peace and beauty is highly important in a world of such chaos. Please keeps these open.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
945-1			I do not live in Utah, but I have been planning a trip by general aviation for years. Please don't close the airports that I have wanted for years to come visit the beautiful scenery up close and personal.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
956-1	Jan deLuise 2480 Cessna Dr. Erie, 80516; R. Scott DeLuise		There is no reason whatsoever to limit airstrip access to these areas! The ecological footprint is nominal compared with other access. No roads, bridges or other infrastructure is necessary. No dust from cars. I'll venture there are no studies that indicate that closing these airstrips would be beneficial to Bears Ears. Show me if they exist.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
960-1	Thomas Luebben		I implore the BLM and the Forest Service to minimize off road recreational vehicle travel and maximize backcountry values in this area of unique geography and geology in all the world. Close active dirt roads in the area if you can.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	See the Travel and Transportation Management section of the Proposed Plan for OHV area designations. Decisions on existing individual and specific roads, and whether they should be open, limited, or closed, will be made under future implementation-level planning for travel management. Implementation-level planning will be consistent with the management direction in the approved RMP and Presidential Proclamations 9558 and 10285.
966-1	Bret de St. Jeor		Please do not restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode in the world, and these small airstrips have been open for decades without any incidents whatsoever that have brought joy and happiness to thousands of people over 70 years.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM

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					Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
988-1	Bob Lisbonne		I am writing to voice my concern about proposed revisions to the Resource Management Plan (RMP) for the Bears Ears National Monument (BENM) which would restrict the use of private aircraft on 16 of 18 airstrips at BENM. BLM lands are intended for public use and enjoyment, one aspect of which is general aviation. Most Utah backcountry airstrips predate the 1964 Wilderness Act; access and use of these airstrips should be retained. Please note that access by air requires no infrastructure like roads, bridges, or corrals; access by air eliminates miles of dusty road traffic; noise from aircraft is transient and of short duration; airstrips are necessarily situated on natural flat land features, such as level, open meadows with little occurrence of soil disturbance or erosion; and airstrips provide vital access to aid Search and Rescue, emergency response, and firefighting. Finally, airstrips are equivalent to trailheads: aviators are non-motorized recreationists, participating in hiking, camping and other low-impact activities. These users practice Leave No Trace ethics, wholly consistent with the BLM ethos.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed
F3-1			Im writing in support of maintaining access to the network of Utah back country airstrips. They provide an invaluable resource to the community as infrastructure for safety and search and rescue as well as low impact access points for recreation and appreciation of the tremendous wilderness Utah has to offer. Ive personally used these strips for camping and hiking and it would be a tragedy to see that access lost for the broader community. There are many support groups that maintain and ensure proper stewardship of these resources in partnership with wilderness preservation and promotion. Here are some of their key points in support: Access by GA aircraft for private, non-commercial use protects the objects and values of the National Monument. In addition to Bluff Airport and Fry Canyon, access should be provided for the other 16 airstrips by private, non-commercial, fixed-wing aircraft for recreational use, the same use that has been ongoing for the past 40-70 years. These existing airstrips are recreational assets, and provide for dispersed primitive camping, especially with increased use of the backcountry by boondocking road vehicles. Aviation has a very small environmental footprint, the lightest footprint form of access to these lands. Access by air requires NO road, nor infrastructure like bridges or corrals. Access by air eliminates miles of dusty road traffic. Most Utah backcountry airstrips predate the 1964 Wilderness Act. Access and use of these airstrips should be retained. Noise from aircraft is transient and of short duration. Airstrips are situated on natural flat land features, such as level, open meadows with little occurrence of soil disturbance or erosion. Airstrips provide vital access to aid Search and Rescue, emergency response, and firefighting. Airstrips offer possible life-saving options when small aircraft encounter mechanical problems or deteriorating weather conditions while flying over the relatively unforgiving terrain in southern Utah. Peer-reviewed research substantiates that small aircraft noise has no detrimental impact on wildlife. Backcountry airstrips offer recreational access to the disabled and those with limited mobility and without the need for strenuous physical activity to enjoy our public lands. Airstrips are trailheads: aviators are non-motorized recreationists, participating in hiking, camping and other low-impact activities. These users practice Leave No Trace ethics. The Recreational Aviation Foundation and the Utah Backcountry Pilots work in collaboration with the BLM and USFS to provide cooperative maintenance of backcountry airstrips, saving administrative resources that can be used elsewhere.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
841-2	Wendy Lessig	Recreational Aviation Foundation	The Valley of the Gods airstrip is the only airstrip where pilots can land and enjoy and photograph this significant panoramic vista. Private, non-commercial, fixed-wing aircraft pilots are no different than the motorized vehicles and visitors who boondock along the highway in order to immerse themselves in the beauty of the natural landscape. I request that the BENM RMP include a provision or a description that would acknowledge that private, non-commercial, fixed-wing aircraft are also welcome visitors to the Valley of the Gods airstrip for recreation and enjoyment of the spectacular scenery within the Valley of the Gods ACEC.	ALTO7-Modification of Existing Alternatives, TRAVEL01-General, ACEC02-Existing ACECs	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15323-6	Bill McGlynn 1711 W College St Bozeman, MT 59715	Recreational Aviation Foundation	Similarly, we see in the method used to establish the No Action Alternative evidence of the same predecision by forcing these additional airstrips through the implementation-level process by considering them as new rather than existing OHV facilities. The front material in the Draft RMP/EIS states the following. The draft RMP/EIS describes and analyzes five alternatives for managing BENM in San Juan County, Utah. The No Action Alternative is a continuation of current management; under this alternative, federal lands and resources would continue to be managed under existing management plans to the extent those plans are consistent with Proclamation 10285. The existing management plans applicable to the Monument include the 2008 Monticello Field Office Approved Resource Management Plan, as amended; the 2008 Moab Field Office Resource Management Plan, as amended; the 1986 Manti-La Sal National Forest Land and Resource Management Plan, as amended; and the 2020 Bears Ears National Monument: Record of Decision and Approved	ALTO7-Modification of Existing Alternatives, TRAVEL01-General, DECI07-Compliance with other laws and policies	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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			Monument Management Plans, Indian Creek and Shash Ja Units. The 2020 ROD/MMPs included the following approved Management Action, LAR-6 Landing on and taking off from existing backcountry airstrips on BLM-administered lands in the Monument will be allowed. The draft RMP/EIS does not state specifically why the management action on backcountry airstrips approved in the 2020 ROD/MMPs were not brought forward into the No Action Alternative. However, given the reference to Proclamation 10285, we must surmise this was done to force any re-authorization through the implementation-level planning process for additional airstrips using the new requirements of Proclamation 10285 (per Proclamation 9558) addressing additional roads or trails. This categorical removal of Management Action LAR -6 from the No Action Alternative is further evidence of a predecision to exclude recreational aviation from the planning area. We think it is instructive to review the planning history of the Monticello Field Office as it has affected these same remote backcountry airstrips.		Route by route designation, including for air strips, requires site specific analysis, which is typically completed at the implementation level. Detailed analysis of designation of airstrips was not undertaken for the area of the Monument covered by the 2020 ROD/MMPs.
8844-1	Keith Barr		Access to back country camping via air needs to be preserved. Air access to back country airports allows us to enjoy remote camping and hiking and is less impact than overland vehicles. This rec area has been a favorite of mine with my 2015 TopCub and I believe these back country airports need to remain open for public use.	ALT07-Modification of Existing Alternatives, TRAVEL01-General, REC01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USDA Forest Service portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8999-11		International Mountain Bicycling Association	The settings provided for by OHV routes are not a preferred bicycle experience. In the desert environment, sharing access with OHV routes leads to poor quality experiences not only from the incompatibility of OHVs with bikes but the condition of the routes due to the nature of powerful motorized travel. Navigating deep sand and loose boulders on a bike are not quality ways to experience the Monument. Again, we highly encourage the BENM management staff to revisit the BLMs GQTE guide to better incorporate quality and appropriate bicycle adventures in the BENM. We recommend the BLM better consider an outcomes-based approach to recreational access and better provide for appropriate bicycle experiences in this landscape. We recommend that the BLM adopt Alternative B language as it pertains to future bicycle access where the DRMP states: Mechanized travel (e.g., bicycles) would be limited to routes where OHV use is allowed and to trails specifically designated for mechanized use.	ALT07-Modification of Existing Alternatives, TRAVEL01-General, REC01-General	Under the Proposed Plan the language from Alternative B has been adopted, (see the Management Actions by Alternative section for Travel Management in Chapter 2). Mechanical use (e.g. bicycles) would be limited to routes where OHV use is allowed and to trails specifically designed for mechanical use.
8999-22		International Mountain Bicycling Association	We believe the BENM can offer a higher quality experience for cyclists seeking to enjoy this monument and we ask the BLM to better address areas that are ideal and should be available for bike access development or authorization in this RMP.	ALT07-Modification of Existing Alternatives, TRAVEL01-General, REC01-General	Proclamation 10285 specifically excludes recreation as a Monument object to be protected, while still naming the world class outdoor recreation opportunities, including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. It also notes the importance of these recreational activities on the regional economy. As such, the agencies sought to develop alternatives that would provide for appropriate recreational opportunities commensurate with protecting BENM objects. The BLM and USDA Forest Service will develop implementation-level travel management plans that will be guided by the landscape-scale management direction provided in the RMP/EIS. The implementation-level travel management plan will assess existing motorized/mechanized trails and routes, as well as future needs and opportunities.
17573-73	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The Draft Plan proposes improper Visual Resource Management (VRM) management. The Final RMP/EIS needs to provide enough decision space for agencies to adequately manage for an unknown future, especially when it comes to visitor management. Agencies should refrain from restricting their ability to properly manage visitation in the future. For example, if VRM is excessively prohibitive, it will prove to be impossible to adequately expand parking areas or bathroom facilities in areas that see an unexpected visitation increase in the future. The Agencies can't predict visitation preferences or trends in perpetuity. Therefore, this plan must allow adequate decision space for an unknown future.	ALT07-Modification of Existing Alternatives, VIS01-General	Under the Visual Resources Section in Chapter 3, under the Proposed Plan, VRM Class I was updated to contain WSA's, protected LWC, and Wild and Scenic Rivers. The VRM Class II and Class III area also updated and would allow for the sort of infrastructure the commenters points to. Site specific NEPA analysis would determine appropriateness of specific locations and actions of proposed projects.
17573-86	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	page 2-23 Matrix Manti-La Sal LRMP Stream stabilization using check dams requires the use of mechanized equipment conflicting with the preferred alternative on 2-20.	ALT07-Modification of Existing Alternatives, WAT01-General	The Proposed Plan was updated for consistency amongst management actions. Under the Proposed Plan agencies (both BLM and USDA Forest Service) would collaborate with the BEC to plan and implement stabilization of streambanks including potential use of check dams. See the Proposed Plan column under the Management Actions by Alternative section for Water Resources in Chapter 2. Additionally, in this same section floodplains and riparian/aquatic areas are excluded from surface disturbance by mechanized equipment unless to protect BENM objects, but open to all treatments on a seasonal basis as determined in collaboration with the BEC and Tribal Nations. This could allow use of mechanized equipment to support installation of check dams if determined to be necessary through collaboration with the BEC and to support protection of Monument objects.
17969-14	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Wildlife and Fisheries TNC supports the focus on habitat restoration to be carried forward into the Proposed RMP/EIS. We support allowances for translocation of wildlife species including beaver, which can be used to restore ecological function of habitat for many species and can potentially support process based stream restoration, such as the work TNC is doing with the BLM in BENM (Attachment C). To ensure adequate water supplies to sustain aquatic health, we recommend that	ALT07-Modification of Existing Alternatives, WAT01-General, WILDFISH01-General	The Water Resources section in Chapter 2 includes management on pursuing and quantifying federally reserved and other water rights. See the Wildlife Section of the Proposed Plan for water catchment management actions. Water catchments would be allowed in order to protect Monument objects. Low-tech process based restoration was added to the Special Status Species section of the Proposed Plan. The recreation section of the Proposed Plan discusses pets and dispersed camping. Campsites will be

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			BLM and the Forest Service pursue the establishment of reserved federal water rights on the segments of the San Juan River included within the boundaries of the BENM to support Endangered and Threatened fish species such as Colorado pikeminnow (<i>Ptychocheilus lucius</i>), razorback sucker (<i>Xyrauchen texanus</i>) and other fish species of conservation interest. TNC recommends that these additional restrictions be incorporated into the Proposed RMP/Final EIS to further protect the wildlife and fisheries resources within BENM and assist with habitat restoration: control of and restrictions on pets within habitat restoration, areas with sensitive species, and wildlife corridors; eliminating dispersed camping within Indian Creek to avoid the bottleneck of wildlife corridors; and prohibiting filming in habitats for sensitive or rare species. TNC recommends that water from precipitation catchments be available to wildlife as well as livestock in consultation with the BEC. These systems are an essential adaptive management tool that provide alternative water sources for wildlife and livestock in order to protect soil, vegetation, water resources, and other BENM objects.		inventoried and monitored. Dispersed camping will be designated where necessary. Pets must be leashed at all times.
14767-145	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 2.4.6.2, we see: Manage riparian and wetland resources for PFCs; manage water resources for quality and quantity. We have discussed, above, the fact that PFC is a totally inappropriate goal for NLCS lands. Its almost as if the contractor wrote the RMP using AI. manage water resources for quality and quantity. is meaningless. What quality? What quantity? This is meaningless fluff to take up space and fool a casual reader that the BLM is doing their job. What are the desired mix of vegetation types, structural stages? Early seral, HCPC? The EIS and DRMP are entirely silent. They could be anything. How would anyone know whether the BLMs desired mix protects and restores all the objects? The BLM says just trust us. Another nice aspiration with nothing to implement it Conduct comprehensive monitoring to track water quality conditions. Where is this comprehensive monitoring? What actions does it apply to? When will it be done? What parameters will be measured? What are the funding requirements for it? What happens to actions when the BLM fails to monitor the impacts of those actions? Is it the usual degradation by default? None of these basic questions are answered. Its just trust us.	ALT07-Modification of Existing Alternatives, WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	See the Management Common to All Section for Water Resources in the Proposed Plan where the agencies will manage water resources to protect and enhance quantity and quality of water resources. In the Proposed Plan, the agencies will manage for water quantity focusing on maintaining or increasing the current volume of both surface and subsurface waters. In the Proposed Plan, management actions for water, grazing, and others, include actions to protect water such as requiring hydrologic studies before land use discretionary actions that would allow for the withdrawal of water. Water withdrawals could reduce groundwater levels (i.e., aquifer) and/or reduce flows in groundwater dependent ecosystems (i.e., springs, seeps, streams), securing federal reserve water rights on BLM lands, and promoting ecological processes (e.g., low-tech process-based restoration) that increase streambank, floodplain, and alluvial water storage which help achieve greater drought resilience.
14767-146	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In the Actions section we see: Dispersed recreation management: Limit use where monitoring indicates that the riparian area or water quality conditions are being impacted by recreational activities. Close dispersed camping areas near surface waterbodies if camping is determined to be a causal factor in impacts to a surface waterbody and/or riparian functions. The impacts of dispersed recreation on water quality are infinitesimal compared with the impacts from livestock grazing, but is there any similar limitation for livestock grazing? No. The BLM ignored this issue.	ALT07-Modification of Existing Alternatives, WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	Thank you for your comment. See the Proposed Plan management actions for livestock grazing in the Livestock Grazing Section in Chapter 2.
14767-148	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	For the rest of the alternatives, the BLM provides: No new discretionary action that alters vegetative cover, results in stream channel instability or loss of channel cross sectional area, or reduces water quality would be allowed within the 100-year floodplains or within 330 feet of springs, riparian areas, and intermittent and perennial streams unless it meets at least one of the following exceptions: The activity is a vegetation treatment that does not impair overall riparian function in a system. The activity is related to development of recreational or range infrastructure that does not impair riparian function. It can be shown that all long-term impacts can be fully mitigated. The action is designed for long-term benefits to riparian, wetland, or aquatic habitats (e.g., side channel restoration). It can be shown that 1) there are no practical alternatives, and 2) the activity is consistent with the protection of BENM objects. So the BLM has defined the primary impact, livestock grazing as not discretionary so it is exempt. Then another loophole is provided in that this only applies to new actions.	ALT07-Modification of Existing Alternatives, WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	Thank you for your comment, your suggestions were evaluated and considered. Under the Proposed Plan no discretionary actions that alter vegetative cover, result in stream channel instability, loss of channel cross sectional area, or reduction in water quality would be allowed within the 100-year floodplains or within 1,000 feet of springs, riparian areas, or intermittent and perennial streams unless it maintains and/or improves riparian function. For management of livestock grazing within 100-year floodplains or within 1,000 feet of springs, riparian areas, and intermittent and perennial streams, see management actions in the Livestock Grazing section of Chapter 2.
18668-8	Vanessa Soncco		Limit access to at least half a mile to riparian areas from any forms of mineral or resource extraction, OHV use, camping, grazing and ROW allowance to protect water resources for human, wildlife and vegetation. Extensive monitoring and adaptive measures developed alongside Tribal nations to protect waterways, springs and riparian areas must be done in all areas of the monument.	ALT07-Modification of Existing Alternatives, WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	The Proposed Plan does consider the effects and places limits on what can occur in riparian areas. There are restrictions in the plan for recreation, grazing, and ROWs to protect the waters of BENM. See the Water Resources section in Chapter 2. Under Presidential Proclamation 10285, subject to valid existing rights, BENM is withdrawn from all forms of mineral entry, location, selection, sale, leasing, or other disposition.
552-5			Invasive plants and noxious weeds are of particular concern to us as future land managers. Any plan to manage these threats should address tamarisk/salt cedar invasion and its association with the endangered southwestern willow flycatcher (SWFL) breeding and the critical habitat present within the management area.	ALT07-Modification of Existing Alternatives, WEED01-General	Tamarisk management is discussed in the Water Resources affected environment and Areas of Critical Environmental Concern sections in Appendix N. Additional discussion of tamarisk impacts to southwestern willow flycatcher was added to the Areas of Critical Environmental Concern affected environment section in Appendix N.
17573-109	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	ES-5.1.5 Noxious Weeds and Nonnative Invasive Plans On page ES-13 and ES-14 Alternative A is the only alternative that allows for the use of herbicides approved for BLM lands. FFSL considers this too rigid of a management strategy and would ask BLM to allow it in special circumstances, such as when necessary to reduce fuel hazards in WUI areas to protect human health and safety.	ALT07-Modification of Existing Alternatives, WEED01-General	Herbicide use is discussed in detail in the Vegetation section. The Proposed Plan in the Vegetation section of Chapter 2 states that the agencies would collaborate with the BEC on herbicide use or other control methods (i.e., introduced species) as part of vegetation management projects.
9372-19	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Grazing is also a very valuable tool regarding a clean and sustainable environment. Grazing is a sustainable method of reducing grasses and weeds that grow and spread. Without grazing, these plants are wasted into dry fire hazards and the noxious spreading of unwanted vegetation. The draft plan states that Prevention measures, including the use of herbicides approved for use on BLM administered lands, would be implemented for treating and preventing the spread of invasives. (Page	ALT07-Modification of Existing Alternatives, WEED01-General	See Section the Livestock Grazing section of the Proposed Plan for livestock grazing management actions. Impacts of grazing on vegetation and invasive plants is discussed in the Terrestrial Habitat and Vegetation Resilience and Conservation and the Noxious Weeds and Nonnative Invasive Plants section in Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			34) Rather than using chemicals to prevent wasted resources, allow grazing to take place in its current designation.		
15381-12	Sagebrush Habitat Conservation Fund		3.4.5. Noxious Weeds and Nonnative Invasive Plants 3.4.5.1. AFFECTED ENVIRONMENT A good discussion of invasive plants and noxious weeds. The discussion fails to recognize that invasive plants and annual weed proliferate in areas where there is ground disturbance, increased availability of bare ground and reduced cover of native, perennial plants. Livestock are a major cause of those conditions throughout the west. In the case of tamarisk, it forms dense, closed stands when native riparian vegetation has been removed by livestock. Livestock are a prime source of most weed problems not just one of a myriad of contributors.	ALT07-Modification of Existing Alternatives, WEED01-General, GRAZ01-General	Impacts of livestock grazing on vegetation and invasive plants is discussed in the Terrestrial Habitat and Vegetation Resilience and Conservation and the Noxious Weeds and Nonnative Invasive Plants sections in Chapter 3 of the RMP/EIS. As outlined in the Livestock Grazing section in Chapter 2, livestock grazing will be implemented to meet the standards for rangeland health in a manner that is consistent with the protection of BENM objects, which include invasive species as an indicator. In addition, if monitoring indicates that domestic livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
14767-154	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 2.4.11.2: Agencies would collaborate with the BEC to identify and avoid adverse impacts on native aquatic, avian, and terrestrial species habitat, connectivity, and movement. Where adverse impacts cannot be avoided, agencies would manage to ensure no net loss of native species habitat, connectivity, and movement. Again more collaboration with the BLMs typical multiple use framework which the BENM is exempt from. The BLM admits it is prioritizing allowing degradation to objects instead of complying with its protect and restore mandate.	ALT07-Modification of Existing Alternatives, WILDFISH01-General	See changes to the Proposed Plan in the Wildlife and Fisheries section in Chapter 2.
11-5	Eric Johnson Amphibian Refuge, 11225 Morocco Road NE Albuquerque, NM 87111	Amphibian Refuge	Amphibian protection measures should be implemented elsewhere in the monument where amphibians potentially occur.	ALT07-Modification of Existing Alternatives, WILDFISH02-Wildlife Habitat	Amphibians may be found anywhere water resources and adjacent upland and dispersal habitat are available. Protection of riparian and aquatic habitat is guided by the Monument's objectives and individual ACEC management plans. Furthermore, any implementation level NEPA analysis for specific projects within the Monument would evaluate the potential for impacts on special status amphibians. Appropriate protection measures may be required at that time.
11-6	Eric Johnson Amphibian Refuge, 11225 Morocco Road NE Albuquerque, NM 87111	Amphibian Refuge	According to RMP/EIS Section 3.4.11.1.1, the following amphibians occur in the Planning Area: tiger salamander (Ambystoma tigrinum), red-spotted toad (Anaxyrus punctatus), Woodhouses toad (Anaxyrus woodhousii), canyon tree frog (Hyla arenicolor), Great Basin spadefoot (Spea intermontane), and northern leopard frog (Lithobates pipiens). The northern leopard frog and Great Plains toad (Anaxyrus cognatus) are listed as sensitive species in Table 3-45. Field surveys and long-term populations monitoring for amphibians should be conducted in the Bears Ears National Monument.	ALT07-Modification of Existing Alternatives, WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	Amphibians may be found anywhere water resources and adjacent upland and dispersal habitat are available. Protection of riparian and aquatic habitat is guided by the Monument's objectives and individual ACEC management plans. Furthermore, any implementation level NEPA analysis for specific projects within the Monument would evaluate the potential for impacts on special status amphibians. Appropriate protection measures may be required at that time.
14701-3	Lucas Barth		Please do not enact year round falcon closures. In fact, more biologists would be great to study the cliffs and lift falcon closures when cliff sites are not being used. It has been tried and tested in many areas of the country that closing known nesting sites in the beginning of the season and then re-opening the sites not used them once the birds have established nests is an effective method.	ALT07-Modification of Existing Alternatives, WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	Seasonal restrictions and closures are being evaluated and considered as part of the Alternatives analysis. Year-round closures are not being considered.
3123-5	Russell Bodnar 5A Road 2976 Aztec, 87410; Tracy Bodnar		Future management priorities should be given to the preferred alternative in management of Wilderness Study Areas, Lands With Wilderness Characteristics, Areas of Critical Environmental Concern, and other similar special protections.	ALT07-Modification of Existing Alternatives, WSA01-General	Thank you for your comment. The Draft RMP/EIS identified Alternative E as the preferred alternative. Proposed management actions for lands with wilderness characteristics are summarized in in the Lands with Wilderness Characteristics section in Chapter 2, and proposed management actions for special designations (e.g., Wilderness Study Areas and Areas of Critical Environmental Concern) are summarized in the Special Designations section in Chapter 2 of the Draft RMP/EIS.
9189-11	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Allowing recreational shooting across the BENM is ridiculous. Who wants to hike or camp with AR15s and other guns being shot within earshot? A person doesnt know where the bullets are going. It is unsettling and scary. I have been a hunter and gun owner my entire life. I worked for Browning Arms for decades and we had gun ranges for shooting. Also, bullets contain lead and lead primers which contaminate the land and poison wildlife. If BENM wants recreational shooting, designate a place for that and then clean up the lead. At least analyze the issue in detail from a noise, safety and contamination of wildlife, soil and water standpoint.	SHOOT02-in favor of shooting closures, ALT07-Modification of Existing Alternatives	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
F4-6			Please adopt the preferred alternatives plan to close the monument to target shooting. Target shooting is incompatible with the values the national monument protects and it threatens birds and wildlife, water quality, cultural resources, natural quiet, and the environment. bears ears is more than just an important place that we value its a chance to practice restorative justice for the five tribal nations of the bears ears commission.	SHOOT02-in favor of shooting closures, ALT07-Modification of Existing Alternatives	Recreational target shooting would be prohibited in BENM under the Proposed Plan.
18657-23	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	While there are some aspects of alternative E that are relatively reasonable (such as dividing the monument into ROS like zones of Front Country, Passage, Outback, and Remote, which dictate the level of amenities offered), most aspects of this alternative are so extreme that it is astonishing this alternative has been labeled the agencies preferred alternative. The overall goal of this alternative is to manage the monument solely for the benefit of tribal groups to the significant detriment of the remainder of the American public. This alternative is not balanced in any manner, and has clearly been crafted with the goal of rewarding the political allies of the Biden administration while punishing its enemies. If the BLM and Forest Service wish to ensure that Bears Ears National Monument	ALT08-Selection of the Preferred Alternative	Thank you for your comment

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			remains a political football well into the future, being continuously shrunk and re-enlarged every time the White House changes hands, all they need do is adopt this alternative as the basis for the final management plan. If the agencies have any interest in a compromise which might bring some stability to the management of the monument, they should instead choose a more reasonable combination of alternatives like Alternative B with incorporation of critical modifications adopted from Alternative A.		
552-8			In regards to existing mineral rights, the document explains that new mining and drilling are not allowed in Bears Ears, but people who already have rights to mine can continue. This approach could overlook opportunities to better manage ongoing mining activities. A deeper analysis of how ongoing mining activities can be managed more effectively is crucial for several reasons. It can find ways to reduce harm to the environment while following the law, making sure mining doesn't damage the natural and historical importance of the monument. An analysis can look into responsible mining practices, finding areas that need to update mining practices to protect nature, and could help balance the use of resources in the area.	DATA06-Alternatives Considered but Dismissed from Detailed Analysis	Per Proclamation 10285 and subject to valid existing rights, BLM and NFS lands within BENM are withdrawn from location, entry, selection, or patent under the Mining Law of 1872 and from disposition under all laws relating to mineral and geothermal leasing. Under all Alternatives, the agencies would manage any operations that occur under the mineral leasing laws pursuant to valid existing rights in a manner that protects and mitigates impacts to the preservation, restoration, and protection of BENM objects. See the Paleontological Resources section in the Proposed Plan in for more information on the management actions that involve surveys and mitigation for discretionary actions.
14767-132	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 2.2 dealing with rejected alternatives, the BLM states: Alternatives that prioritize multiple uses over protection of BENM objects. Rationale: Section 302 of FLPMA states that public lands should be managed under the principles of multiple use and sustained yield except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law. Proclamation 10285 dedicates the lands within BENM to a specific use, therefore the lands reserved within the Monument boundary must be managed in a manner that protects the objects for which the Monument has been designated. In other words, within BENM, typical multiple use management is superseded by the direction in Proclamation 10285 to protect Monument objects. Multiple uses are allowed only to the extent they are consistent with the protection of the objects within the Monument. Because an alternative that prioritizes multiple uses over the protection of BENM objects would be inconsistent with Proclamation 10285 and, therefore, Section 302 of FLPMA, it was not analyzed in detail. But this is exactly what all the alternatives examined do with regards to the primary source of impacts, private livestock grazing. All the alternatives maintain the status quo or worse, remove requirements or limitations currently existing in the applicable RMP and Forest Plan.	DATA06-Alternatives Considered but Dismissed from Detailed Analysis	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Implementation actions for livestock grazing will be done at the site-specific planning level. The Proposed Plan also includes prioritizing 6 allotments for the completion of rangeland health assessments within 3 years and NEPA within 6 years of the signing of the ROD. See Chapter 3 for discussion of impacts from livestock grazing to resources including BENM objects, BSC, and invasive plants.
14767-133	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	For the no grazing alternative rejected by the BLM, the BLM states: The BLM reviewed monitoring data and remote sensing data to better understand land health and ecosystem function, identifying departed watersheds and departed vegetation and soil conditions. In these departed areas, the BLM would consider discontinuing livestock grazing under Alternative D; however, the monitoring data and remote sensing data did not suggest that grazing was incompatible with protecting Monument objects in all areas of BENM, making it unlikely the BLM would be able to justify selecting such an alternative. Under several alternatives, land health assessments and/or causal factor determinations would be completed in certain areas within given time frames and may be used to inform livestock grazing permit renewals. Where a categorical exclusion cannot be used to fully process a grazing permit, a no grazing alternative would be considered for in the NEPA document consistent with BLM Instruction Memorandum 2012-169. Analyzing a no grazing alternative within this EIS would involve broad landscape considerations of effects across nearly 1.36 million acres of BENM, whereas a site-specific analysis of no grazing during the permitting process would provide a more site-specific understanding of grazings effects on allotments, land health, and BENM objects. While the BLM may be telling the truth that it reviewed monitoring data and remote sensing data to better understand land health the EIS failed to provide this analysis making it impossible for the decision-maker or the public to examine the veracity of this assertion. What analysis questions were asked? Where the questions asked appropriate? What data was examined? Was the data examined current and able to answer the questions asked? Why disclosure of this analysis is so critical is because it contradicts decades of BLM data and analysis.	DATA06-Alternatives Considered but Dismissed from Detailed Analysis	The Availability of Data and Incomplete Information section in Chapter 3 discusses data used in the preparation of the analysis of the RMP/EIS. The Livestock Grazing Section in Chapter 3 provides a discussion of the existing conditions regarding livestock grazing and a discussion of impacts to forage conditions, grazing operations, and range improvements from grazing management.
14767-137	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Moving back to the BLMs rationale for rejecting the no grazing alternative, we see: however, the monitoring data and remote sensing data did not suggest that grazing was incompatible with protecting Monument objects in all areas of BENM What areas did it find livestock grazing to be compatible? What areas did it find livestock grazing to be incompatible? On what rational basis did it make these foundational conclusions? The EIS is entirely silent, violating NEPAs hard look requirement.	DATA06-Alternatives Considered but Dismissed from Detailed Analysis	See the Livestock Grazing section in the Proposed Plan. Agencies would continue to make decisions in collaboration with the BEC and with grazing permittees regarding range improvements. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Implementation actions for livestock grazing will be done at the site-specific planning level. The Proposed Plan also includes prioritizing 6 allotments for the completion of rangeland health assessments within 3 years and NEPA within 6 years of the signing of the ROD. See Chapter 3 for discussion of impacts from livestock grazing to resources including BENM objects, BSC, and invasive plants.
552-7			In section 1.4.2 (Impact on Wild Horses and Burros) the explanation provided in the document was that there is no management plan set up for wild burros and horses because the herds are just passing through, and there are no designated areas for them in the monument. Also since the horses and burros are not officially part of the area's wildlife management it is suggested looking into this further is not necessary. This is shortsighted as the likelihood of the animals coming into the managed areas are high. Understanding the impact of management on these animals is important	DATA06-Alternatives Considered but Dismissed from Detailed Analysis	Wild horses and burros and Wild horse and burro Management Areas are not present in the Monument.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			for several reasons. First, it acknowledges that people care for the welfare of all wildlife within the monument, including those that may only be there occasionally. Second, understanding how they affect the environment can help make plans that match the goal of protecting the area in the monument. A detailed analysis would create new ways to manage these animals while keeping the overall goals of preserving the monuments natural resources.		
552-9			Finally, when reading through the Public Health and Safety Concerns Related to Abandoned Mines it's mentioned that the current plans for handling old, unused mines won't change. These mines can be dangerous or pollute the environment. The management could look into more ways to clean up these mines and make sure people know about the dangers surrounding them. Abandoned mines pose significant hazards, including physical dangers to visitors and environmental threats such as water pollution. By focusing on a detailed plan to check and reduce these dangers, management can do a better job at keeping people safe and protecting the environment. We encourage these issues to be considered and analyzed as part of the comprehensive management plan.	DATA06-Alternatives Considered but Dismissed from Detailed Analysis	Thank you for your comment, ways to clean up mines is outside the scope of this RMP and would be addressed at the implementation level based on the specifics of the mine to be addressed. However, closure of abandoned mines could be planned and undertaken as part of managing the Monument, as allowed by agency direction and regulation and would be considered in future implementation planning actions where applicable. Public education about mine safety could be considered as part of implementation level interpretation and education planning as well.

Table U-11. Editorial

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15761-2			Define best management practices.	EDIT01-tech edits needed in the EIS	Please see the Glossary in Volume 2 for a definition of "best management practices."
15761-7			I had a hard time understanding the lingo of the document. There were too many terms I didn't understand language such as structural types, stream functions, Adaptive management, public water reserve criteria, stream geometry relationships etc. It seems the document is written for lawyers or gov employees who use this terminology regularly. I appreciate this consideration.	EDIT01-tech edits needed in the EIS	Thank you for your comment. Many terms are defined in the glossary section in Volume 2 of the EIS. We will add definitions of additional scientific and management terms to the glossary during revision.
18113-5	Jerry DiMarco Bozeman, MT		There are too many acronyms. Only long established, well known terms should have acronyms.	EDIT01-tech edits needed in the EIS	Thank you for your comment. Acronyms have been introduced according to established style guidelines agreed upon by agencies and contributors. See Chapter 1 for a list of acronyms.
18657-40	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Unfortunately, the maps that have been provided to the public are wholly inadequate to inform and equip members of the public to submit relevant and substantive comments. The static maps available in PDF format are too small to effectively convey the level of detail contained in them. Additionally, the shades utilized to demonstrate variance in open, limited, and closed zones among the five alternatives are monochromatic, making it nearly impossible to effectively distinguish the defined borders and scale of land within each respective zone.	EDIT01-tech edits needed in the EIS	Appendix A included both textured, rather than color-coded, maps representing OHV Limited and Closed areas and a series of maps for each alternative which displayed all existing designated routes within those areas as blue (for those within OHV Limited) and red (for those within OHV Closed). In addition, the public was provided with an interactive map, which allows for zooming in to specific routes, where they can be compared to OHV area classification for each alternative, aerial photography, and layers for the other resources.
18657-43	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Figure 3-40 Current Travel System This map (located in Volume 2 of the RMP, Figure 3-40, Current travel system, page A-89) inaccurately portrays at least 15 motorized routes in the national forest as being non-motorized. In other words, it should show the routes in black instead of brown. The 15 routes are highlighted in green in the second image below. Note that this same inaccuracy is found in the "FS BENM Roads Draft" layer of the BLM's interactive map. In fact the interactive map is worse, as it omits over 40 motorized routes (these 40 routes are addressed in the next itemized point below).	EDIT01-tech edits needed in the EIS	The final EIS includes updated maps to reflect all alternatives.
24-2	George Wuerthner POB 8359 Bend, 97708		Throughout the document the agency says it will incorporate TEK, but it is never defined. How can I make a comment on something that is never defined. The documents need to be more specific. I.e. if you are consulting on wood cutting and say you will consult with TEK, explain exactly how TEK would affect wood cutting. That is the same for all the references to TEK.	EDIT01-tech edits needed in the EIS	The Proclamation requires that the agencies ensure that management decisions affecting the monument reflect expertise and traditional and historical knowledge of Tribal Nations. Traditional Indigenous Knowledge and Traditional Ecological Knowledge are defined in the Glossary. See the Tribal Stewardship section and the Inventorying, Monitoring, Science, and Indigenous Knowledge section of Proposed Plan for ways Traditional Indigenous Knowledge and Traditional Ecological Knowledge would be integrated into BENM management.
583-2	David Siegel PO BOX 65658 Albuquerque, NM 87193		The Draft RMP-EIS uses the Abbreviation "TCP" (Traditional Cultural Property), but TCP is not included in the list of Abbreviations.	EDIT01-tech edits needed in the EIS	TCP has now been defined in the Proposed Plan.
889-38	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	In the ROS zone maps for the Forest Service portion of BENM, the entirety of the Peavine Corridor is shown inside a green Primitive ROS class. Unlike other nearby motorized routes, there is no cherry-stemmed Semi-primitive Motorized zone around it. This is highly concerning as the plan direction for Primitive ROS classes appears to mandate that existing motorized routes within this class be closed, stating, Primitive ROS classes would be unsuitable for motorized use, and no roads or motorized trails would be designated within them.30 Confusingly, the OHV area designation map layers in the interactive map do show a cherry-stemmed corridor of OHV-limited around the Peavine Corridor road, even though the ROS designations map layer does not. These two map layers thus contradict each other and the ROS layer appears to be in error, as the fact that the OHV area layers for all alternatives shows an OHV-limited corridor around the road appears to indicate the agencies intent to allow the road to remain open.	EDIT01-tech edits needed in the EIS	The Peavine Corridor cherry stem is located within a Semi-Primitive Motorized ROS Class in Alternatives A, B, C, and D and in an Outback Zone in Alternative E.
889-44	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Chicken Corners is without a doubt one of the most popular 4x4 trails in Moab and absolutely must stay open. It is important to note that the last 0.2 miles of this road are in inventoried lands with wilderness characteristics, while the remainder of the road is cherry-stemmed through them. The last 0.2 miles of this route are shown as closed by the OHV area designations in all alternatives, making it appear that it should be closed even under the current land management plan, which I believe is incorrect. That portion of the road is managed as open on the ground and is shown as a designated route in the 2008 Monticello Field Office travel plan maps. A picture of the well-defined parking area at the end of the trail at 38.44167, -109.73669 from my visit in May 2021 is shown below. We believe that maps showing this portion of the road in an OHV close zone are in error and need to be corrected.	EDIT01-tech edits needed in the EIS	The OHV closed area in this location has been redrawn to cherry stem out the Chicken Corners turn around. This is consistent with the Wild and Scenic River designation for Colorado River Segment 3, since a Scenic suitable segment does not have any specific prohibitions on OHV use.
17606-2	Skylar Begay 281 N Stone Ave Tucson, AZ 85701	Archaeology Southwest	A final note on terms of reference: There is no such thing as BLM lands or Forest System lands; there are, of course, millions of acres of public lands managed by BLM and USFS for the benefit of the American people, all of which were once exclusively owned by Indigenous Peoples, the descendants of whom retain many rights of use and management. The final BENM RMP-EIS and related documents should refrain from use of terms that suggest exclusive federal agency ownership or otherwise discount Tribes as rights holders and the public as shareholders.	EDIT01-tech edits needed in the EIS, LAND01-General	BLM lands and NFS lands are commonly used terms when referring to public lands managed by those federal agencies.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18657-44	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Even though travel planning is supposed to occur after the RMP is approved, inaccurately portraying at least 15 motorized routes as being non-motorized obfuscates the public's ability to meaningfully participate in the planning process. For example, Trail 203 (which is the northernmost of the 15 motorized routes on Heifer Mesa) is in an Inventoried Roadless Area (IRA), so the presence of that motorized route could inform the public's comments on the IRA aspects of the draft RMP. For this same reason, routes should not be hidden by the monument boundary on maps. Shay Ridge ATV Trail appears to be inside the monument within RMP maps as indicated by: 1. The BLM's interactive map (when using the "imagery" basemap) 2. The proposed OHV Closed Area boundary presumably following the Shay Ridge ATV Trail in figures 2-34 through 2-37 3. The black line that's barely visible (behind the red monument-boundary line) near the south end of Shay Ridge ATV Trail in Figure 3-40 If this is the case, then Shay Ridge ATV Trail (and any other motorized routes along the monument boundary) should be made visible in Figure 3-40 and the corresponding layer of the BLM's interactive map so that the public can view, understand, evaluate, and effectively comment on the complete travel system.	EDIT01-tech edits needed in the EIS, PUBL06-Public Outreach/Availability of Info	No motorized routes are being closed on NFS lands by this plan. The Shay Ridge OHV trail winds in and out of the BENM boundary, but it is not being closed in any alternative nor the Proposed Plan, nor is it within an OHV closed area.
19002-5	Maury Bergman bergmanmaury@gmail.com		I would like to comment specifically regarding which roads and areas would be locked up, however the maps are insufficient to comment. They are extremely unclear and provide no orientation. The grazing maps are even worse. They provide no allotment boundaries. To provide a sufficient comment, these maps need to have additional clarity. The proposed Management Plan needs to publish a supplement, so I, and others, can provide an effective comment on these areas.	EDIT01; TRAVEL01	The public was provided with both a static map showing each currently designated route and its status within an OHV limited or OHV closed area (EIS, Volume 2, Appendix A) and an interactive map allowing for the same information to be viewed in detail. See the figures in Appendix A for resource maps for the Proposed Plan.
18657-74	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	US citizens are protected from the risk of BLM and Forest Service overreach in management authority by the functions of congressional process, FLPMA, as well as the broader framework of the US Constitution. Thus, we are alarmed and disappointed that there are multiple statements within the RMP that assert that the public land within BENM is federally owned by the BLM and/or Forest Service. In order to protect the vested rights and ownership that American citizens possess through the endowment of our treasured public lands, and to ensure accurate language that aligns with FLPMA, the US Constitution, and Congressional directives, each of these false statements within the RMP must be corrected. Erroneous references to federal ownership of public lands are found in the following: Volume 1, Section 3.5.6, Lands and Realty, page 3-387, paragraph 3: As dictated by FLPMA, the BLM has a responsibility to plan and manage federally owned public lands that are administered by the Secretary of the Interior. This must be corrected to state federally administered or federally managed. Volume 1, Chapter 1, Purpose and Need, 1.1: Introduction, page 1-1, paragraph 6: The Federal Land Policy and Management Act of 1976 (FLPMA) establishes the policy of the United States concerning the management of federally owned land administered by the BLM. This must be corrected to state public land owned by the citizens of the United States, and managed by the BLM Volume 1, Section 3.4.1.2, Environmental Consequences, part 3.4.1.2.2, Impacts Common to All Alternatives, page 3-16, paragraph 2: If BLM-administered or NFS lands are disposed of and removed from federal ownership, they no longer retain any BLM or USDA Forest Service protection for paleontological resources. This must be corrected to state BLM- or NFS-managed lands are removed from federal management Volume 1, Section 3.4.3.1, Affected Environment, Table 3-12, National Hydrography Dataset Features within the Planning Area by Land Ownership, page 3-52: The BLM, USDA Forest Service, and USDA Forest Service Wilderness Area are all cited as entities with ownership of land within the planning area This must be corrected to distinguish accurate, legal land owners (Private and State entities) from public land managers (BLM, USDA Forest Service, and USDA Forest Service Wilderness Areas). The American public must be cited as owners of public lands that are managed by any federal agency. Volume 2, Glossary, page 9, National Monument: An area created from any land owned or controlled by the federal government for the protection of objects of historical, cultural, and/or scientific interest. This glossary item must be corrected to state An area created from any land managed by the federal government Volume 2, Glossary, page 12, Public land: Land or interest in land owned by the United States and administered by the Secretary of the Interior through the BLM or Secretary of Agriculture through the USDA Forest Service. This must be corrected to state Any land and interest in land owned by the citizens of the United States Please note, there may be additional erroneous references to federal, BLM, or Forest Service ownership of public lands in other components of the RMP, appendices, and supporting documents. The items in need of correction as noted above are not intended to be a comprehensive list of all such references. All additional erroneous references must also be corrected.	EDIT01-tech edits needed in the EIS	The EIS text will be edited to clarify that federal land management agencies manage or administer public lands, not own them.

Table U-12. Environmental Justice/Socioeconomics

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17601-3	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	LOSS OF PUBLIC ACCESS SEVERELY DECREASES THE VALUE OF TRUST ASSETS A recent appraisal study conducted by an independent third-party appraiser on a parcel of trust lands within the San Rafael Desert travel planning area revealed that the loss of existing public access to trust lands resulted in an approximate two-thirds reduction in the overall value of the affected property. This loss in value translates to a significant economic setback for the trust beneficiaries. It underscores the critical importance of maintaining public access in all alternatives to fulfill our statutory and constitutional mandate to maximize the economic value of trust lands.	EJSOC01-General	Under the Proposed Plan, ROWs or SUPs may be granted/authorized reasonable access to non-federal inholdings consistent with the protection of BENM objects. See the Environmental Justice and Social and Economic Values Section for discussion of impacts to TLA parcels from OHV area designation. See the Proposed Plan under the Travel and Transportation Section.
12746-36	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The Organizations would note that the Proclamation directly recognizes the importance of economic contributions to local communities but at no point raises the need to address possible surplus values in commodities on the planning area. Many of the categories provided simply do not appear on the planning area with any intensity at all, such as downhill skiing. We are aware the NRA adjacent to the planning area provides significant motorized boating opportunities but we question how relevant this usage is for the planning area analysis. Again, why would these categories even be addressed as the Proclamation speaks to contributions to communities from activities on the Monument, not activities next to the monument that would be outside the scope of planning. When the generalized review of recreation spending profiles provided by the Proposal is reviewed, several categories of information are provided that are so completely inaccurate as to render the analysis without merit at all. While information that is largely academic in nature is provided along with information on uses not occurring on the planning area, many of the basic contributions recreational activity on the monument is simply not accurately addressed. A brief review of the accuracy of basic calculations and assumptions critical to understanding the economic contribution of outdoor recreation provides conclusions that cannot be defended factually or legally and are verging on simply impossible to achieve. The Proposal provides the following table outlining the conclusions that were used for the calculations of economic contributions for recreation. [see letter for table, page 37 in PDF, and pages 38 - 42 for supplementary information]	EJSOC01-General, DATA01-Analysis Methods and Data, REC01-General	Total economic value is the combination of all benefits people receive from BLM-managed lands and resources. Total economic value is the sum of the market value from economic activities and the nonmarket value. This discussion was added to the Environmental Justice and Social and Economic Values Section to clarify. Nonmarket values are unable to be quantified; however, consumer surplus can be used as an estimate of some of the nonmarket values for individuals. The discussion on consumer surplus was provided to highlight the value that recreation provides under all alternatives, but the discussion on consumer surplus was not analyzed under the impacts by alternative, due to the difficulty of quantifying consumer surplus. Therefore, the discussion on consumer surplus was revised so that it is discussed qualitatively, rather than quantitatively, and the Estimates of the Average Consumer Surplus of Recreation Benefits for the Intermountain Region, per Person per Primary Activity Day table, was removed.
916-15	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	The agency should adequately consider justice for the closure of motorized recreational opportunities that were made without adequate and credible scientific data and analyses and/or without adequate comparison to natural impacts and change.	EJSOC01-General, DATA02-Inadequate Methodologies, TRAVEL01-General	Discussions on impacts on economic and social conditions due to changes in recreation, including motorized recreational opportunities, are included throughout the Environmental Justice and Social and Economic Values Section.
12746-37	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	Given this specific requirement in the Proclamation, alignment of spending profiles and other factors analyzed in the economic analysis would be required to comply with the Proclamation. Discrepancies between the calculations and conclusions of the two agencies would also have to be addressed. Given the geographic overlap of the two planning efforts, collaboration of the two agencies and consistency of conclusions is critical to the planning for the Monument as a whole, as the Manti/LaSal NF also makes approximately 22% of the Monument Planning area. The need for alignment of basic conclusions for the planning area is driven by the fact that Manti/LaSal NF has been undergoing an RMP update over the same basic timeframe as the planning has occurred on the BENM, making the conclusion and process highly relevant to the Proposal. As the Organizations have also been involved in the Manti/LaSal NF RMP revision, we are aware that the spending amounts and profiles used in the Manti/LaSal plan are reasonable in their conclusions. [see letter for supplementary information on PDF pages 43 - 46]	EJSOC01-General, DATA05-Connected Actions, REC01-General	The Environmental Justice and Social and Economic Values Section provides a detailed description of the methodology used for calculating the visitor spending profiles and economic contributions from recreation activity. Some estimates for the Manti-La Sal National Forest were carried forward and used in the analysis for this effort; however, as noted in the comment, Manti-La Sal does not make up the entire Monument, so the estimates were adjusted to better reflect the Monument as a whole. Economic contribution numbers were also provided by 1,000 parties, so if the readers have differing estimates for recreational visitor parties than what were calculated in the DEIS, they can use their own estimates to calculate economic contributions.
12746-21	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	Given this clarity of the importance of economic contributions by the Proclamation as more important than other values in the area, it would be reasonable to expect a highly detailed and accurate analysis of this issue would be provided. This type of analysis would be critical in developing maximum public input on the Plan. Despite these clear requirements, the Proposal fails to accurately address economic contributions of recreation. This failure is more egregious as reasonably accurate economic contribution information being developed in other planning efforts within the Monument being conducted at the same time. In addition to these specific requirements in the Proclamation, economic impacts is a factor that also required to be addressed in the NEPA process. Despite this legal requirement of NEPA analysis being of heightened importance for the Proclamation, the Proposal falls woefully short of a legally sufficient legal analysis of this issue and well short of the analysis of an issue identified as an important sector of the planning area community. Until large scale violations of the Proclamation and NEPA requirements can be resolved, the Organizations are unable to support any of the proposed Alternatives.	EJSOC01-General, DECIO7-Compliance with other laws and policies, DATA02-Inadequate Methodologies	A detailed analysis on the impacts on economic contributions due to potential changes in recreation under each of the alternatives is provided under the Economic Contributions subsections in the Environmental Justice and Social and Economic Values Section.
18215-1	Kamaile Tripp-Harris		In my role as a Community Health worker, I have witnessed the health disparities caused by the lack of running water and the inability to use the natural land and resources. The infrastructure needs to be developed, and the people need to be empowered to self-sustain. Addressing these health disparities is not just about providing resources; its about addressing structural racism and bringing social justice for the tribe by returning their ancestral lands to them. The benefits of the Navajo nations stewardship of Bears Ears are manifold. It would not only lead to the return of their cultural	EJSOC02-EJ Populations	The Environmental Justice subsections in the Environmental Justice and Social and Economic Values Section includes discussions on impacts on environmental justice populations, including individuals who identify as part of a tribe or of an indigenous population. For example, in Impacts under Alternative E, there is a discussion that explains that under Alternative E, there would be the least number of adverse impacts to Tribal Nations and their members.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			medicine and community strength but also contribute to the preservation of this land for future generations.		
18315-4	LISA RARICK		In my younger years I could hike and explore. As an older adult with physical limitations, I now have to resort to using a Side by Side off road vehicle to access many of these locations. Putting restrictions that only allow access to hikers or closing roads to motorized travel for many of these locations seems unfair to citizens in similar situations like myself.	EJSOC02-EJ Populations, ALT07-Modification of Existing Alternatives, TRAVEL01-General	Additional information was added to the Environmental Justice and Social and Economic Values section of Chapter 3 to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment. The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws.
18082-55	Shannon Snyder; Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The cumulative effects analysis did not include an evaluation of how climate change may combine with BLM-authorized activities to disproportionately impact communities with environmental justice concerns. Section V(D) of the Interim Guidance states agencies should consider whether the effects of climate change in addition to the effects of the proposed action, may result in disproportionate and adverse effects on communities with environmental justice concerns. Communities with environmental justice concerns often include communities of color, low-income communities, and Tribal Nations and Indigenous communities. Agencies should also consider how impacts from the proposed action could potentially intensify climate change-related hazards such as storm surge, heat waves, drought, and flooding. We recommend the Final EIS include this evaluation and mitigation measures or directions to address climate-related disproportionate impacts to communities with environmental justice concerns.	EJSOC02-EJ Populations, DATA01-Analysis Methods and Data	The agencies added a discussion on cumulative impacts from climate change on communities with environmental justice concerns in the Final EIS in the Cumulative Impacts subsection of the Environmental Justice and Social and Economic Values Section.
19001-6	Bruce Lyman bjlyman61@gmail.com		I'd like to comment about my thoughts of the economic impact that some of the proposals in this management plan will have on San Juan County. San Juan County is one of the poorest counties in the entire country. We have very little private land and rely heavily on access to public lands. These lands have been historically used for ranching, hunting, mining, logging, and gathering wood to heat homes and juniper trees for building hogans. People in this county rely on these lands to survive and they have for hundreds of years. As we have seen some industries almost disappear such as logging, and mining's been severely restricted we are told, "you need to transition to a recreational economy." With most of the proposals in this management plan recreation at least the type that brings in tax dollars to the county will also be severely limited. To put it quite simply, people who use roads bring tax dollars in. People in Jeeps, and UTV's buy food at the grocery store, gas at the gas station. They eat at restaurants and stay in hotels. Backpackers drive in, go hike and leave maybe buying a tank of gas on the way out. The only county service they seem to enjoy is search and rescue. The restrictions proposed by this management plan with the exception of alternate (A), the no action alternate, are going to bring unnecessary hardships to all the people of San Juan County but mostly to the native population who so heavily rely on the natural resources.	EJSOC03	Please see the discussions under the Affected Environment sub-header in the Environmental Justice and Social and Economic Values Section for the analysis of impacts on economic conditions and way of life for the local communities.
19002-7	Maury Bergman bergmanmaury@gmail.com		My final comment is regarding the Environmental Justice Impact. San Juan County, Utah, in its entirety, is economically depressed. Disabling businesses to use the resources found on and near the monument such as gravel quarries, mineral and wood extraction, etc. is detrimental to the rural community's economies. Many of the homes in San Juan County are heated primarily by wood burning stoves and the majority of homes on the Ute and Navajo Reservations are heated by wood burning stoves. Many families for generations have celebrated the act of harvesting wood for the upcoming winter. This is a cultural practice that needs to be preserved to be in compliance with the purpose for the Proclamation.	EJSOC03	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values Section, the subheader for Impacts Common to All Alternatives, as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in the Environmental Justice and Social and Economic Values Section, Environmental Consequences, as well as the sections for impacts under each alternative. Impacts on environmental justice are analyzed in the Environmental Justice and Social and Economic Values Section of the RMP/EIS. See the Forestry and Woodlands Section for management actions in Forestry and Woodlands. The Proposed Plan allows for continued woodland harvest following applicable laws. See Appendix A for maps of areas available in the Proposed Plan. See the Forestry and Woodlands Section of the Proposed Plan for updated management actions for acreages open and closed to woodland harvest.
19007-2	Angela Marian		Increased Cost: Compliance with the new possible regulations can lead to increased costs for ranchers. This might include additional fees for permits, costs associated with fencing or other infrastructures to comply with new boundaries of restricted areas, and possible legal fees to navigate this.	EJSOC03	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values Section, the subheader for Impacts Common to All Alternatives, as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in the Environmental Justice and Social and Economic Values Section, Environmental Consequences, as well as the sections for impacts under each alternative.
19007-6	Angela Marian		Economic Viability: Reduced grazing allotments and increased operational costs can make ranching economically unviable for some families and their whole livelihood is tied up in ranching. This financial strain can lead to ranchers being forced into selling their land or going out of business, which not only affects individual families but can also impact the whole economy.	EJSOC03	The Proposed Plan does not alter currently allocated AUMs as outlined in Chapter 2 Livestock Grazing. Any reductions that are determined to be necessary due to the reduction of acres available to grazing would be done at the implementation planning level. The impacts of the Proposed Plan to livestock grazing and permittees is disclosed in the Environmental Justice and Social and Economic Values Section where it is recognized that restrictions could have an impact on permittees.
19008-2	Bayley; George; Kevin; Kirk; Nathan; Ron Chamberlain; Crowley; Dunn; Hedglin; Rice; Skinner info@monticelloutah.org	City of Monticello	While we are unsure of the exact impact on the ability for ranchers to continue to make their living by running livestock in the BENM, we are against any restrictions beyond those that are currently in place. The Forest Service and BLM have been responsibly managing grazing allotments in this area for many years, and we see no need to make these allotments more restrictive.	EJSOC03	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in Environmental Consequences and Impacts Common to All Alternatives of the Environmental Justice and Social and Economic Values section. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in Environmental Consequences of the

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					Environmental Justice and Social and Economic Values section, under t Impacts Common to All Alternatives and the sections for impacts under each alternative.
19008-3	Bayley; George; Kevin; Kirk; Nathan; Ron Chamberlain; Crowley; Dunn; Hedglin; Rice; Skinner info@monticelloutah.org	City of Monticello	The restrictions within the BENM on mineral exploration and oil and gas drilling and extraction are devastating to our community and to San Juan County as a whole. Because of our limited populations, many of whom are Native Americans, we rely on the revenues from taxing the wise use of these resources to fund needed services and infrastructure. Further restrictions limit our ability to continue to provide services that are greatly needed for the residents here. These restrictions also contribute to the necessity that exists for the United States to import more of our energy needs, rather than utilizing what we have right here in our own country.	EJSOC03	Proclamation 10285 withdrew BENM from all forms of mineral entry and location, subject to valid existing rights. Revising that Proclamation is outside the scope of this document. Under all alternatives, the agencies would manage any operations that occur under the mineral leasing laws pursuant to valid and existing rights in a manner that protects and mitigates impacts to the preservation, restoration, and protection of BENM objects. See the Proposed Plan for more information on the management actions that involve surveys and mitigation for discretionary actions.
19033-5	Randy Parker	Salt Lake County Farm Bureau	Many do not recognize San Juan County has only eight percent of the lands within its borders privately owned. Or that neighboring Kane County has 11 percent and Garfield County a paltry five percent private ownership. These counties with such limited tax base struggle to fund local government and provide opportunities for private businesses to establish and thrive. Family livestock ranching has historically been the foundation of rural economic opportunity and the tax base of these federal land dominated counties. Under the Taylor Grazing Act, grazing rights and access to public lands for livestock grazing was established based on local private land ownership and water rights. Uncertainty is having a dramatic impact on these generations' old agri-businesses and the management alternatives except the current management plan for the Bears Ears National Monument would further exacerbate the situation. These ranching businesses that harvest the annually renewing forage provide jobs, health care, roads, public schools and services like emergency services, search and rescue and hospitals - important to locals and to visiting tourists. Uncertainty and ramped up federal regulatory actions that suspend or terminate livestock grazing AUMs on federal lands are displacing or ending historic family ranching in Southern Utah. These are ranching families heavily dependent on federal grazing permits. Any of the management alternatives except the current plan will dramatically impact the three counties that surround a Bears Ears National Monument	EJSOC03	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values section, under Environmental Consequences, Impacts Common to All Alternatives, and the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in the Environmental Justice and Social and Economic Values section, under Environmental Consequences, Impacts Common to All Alternatives, and the sections for impacts under each alternative. The Environmental Justice and Social and Economic Values section of Chapter 3 discusses grazing contributions to the region's economy, and the multiplier impacts resulting from grazing activities. The discussion of environmental consequences for grazing activities is documented in the Proposed Plan using IMPLAN analysis, which clearly depicts these multiplier impacts from indirect and induced impacts. The Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 97% of BENM lands that are currently available would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.
19033-7	Randy Parker	Salt Lake County Farm Bureau	Some continue to argue national monuments like the Bears Ears National Monument are an economic boon. The locals certainly appreciate all the dollars tourists bring to the local economy, but sustainable rural economies cannot exist on seasonal service industry jobs alone. Those who come to rural Utah for the magnificent beauty and recreational opportunities generally get outfitted somewhere upstate before making their way to Utah's backcountry. Locals have a saying about tourists; "They come in a pair of khaki shorts with a \$100 bill in their pocket and don't change either!" Right or wrong, the reality is, recreation and tourism will not build and sustain rural economies, provide living wages and sustainable opportunities for local residents.	EJSOC03	In the Environmental Justice and Social and Economic Values section, impacts on economic contributions due to changes in recreation visitors to the area are analyzed under each alternative. These impacts include impacts on outfitters as well as other recreation and tourism-related industries. See Relationship to Other Plans and Policies for information on the APA and compliance with other laws and policies.
19017-34	Sylvia Stubbs	San Juan County	p.3-363 Economic Contributions 2nd full paragraph, P1 sentence: This statement reads " ... if grazing permittees decide to voluntarily relinquish their permits or lease, the lands under the allotments would be retired from livestock grazing." Retirement from grazing may not always be the case as the Proclamation states that the Secretaries may reallocate the forage in the relinquished permit for livestock grazing purposes if doing so would advance the purposes of the proclamation. Clarification should be added to the end of the statement such as 'unless the Secretaries find that reallocation of forage for livestock use would advance the purposes of the Proclamations.'	EJSOC03; GRAZ01	Presidential Proclamation 10285 states: "Should grazing permits or leases be voluntarily relinquished by existing holders, the Secretaries shall retire from livestock grazing the lands covered by such permits or leases pursuant to the processes of applicable law." The process is relinquishment is further clarified in the Proposed Plan in the Livestock Grazing and Environmental Justice and Social and Economic Values sections. The analysis in Environmental Justice and Social and Economic Values section of Chapter 3 was updated to clarify economic impacts from voluntary relinquishments and continued grazing practices. The Proposed Plan includes additional acres on BLM made unavailable to grazing or limited to trailing only than is currently grazed.
19017-35	Sylvia Stubbs	San Juan County	AUM figures in Table 3-118 don't match with those shown in Table 2-2 p. 2-131 . For instance, Allocated AUM figures in Alternative E (63,894 total BLM and NFS) don't match with those shown in Table 2-2 Alternative E (72,694 total) and information for Alternatives A, Band C in Table 2-2 doesn't match with that in Table 3-118. This is confusing and hinders understanding of the alternatives. Please correct these inconsistencies.	EJSOC03; GRAZ01	The referenced table does not include AUM values. The Alternatives for Livestock Grazing Table assigns 62,035 AUMs on BLM-administered lands and 10,659 AUMs on NFS lands under Alternative E and the Proposed Plan. This matches with the allotted AUMs reported in the Number of Allocated Animal Unit Months and Estimated Billed Animal Unit Months by Allotment Type and Alternative Table for BLM lands and closely aligns with the AUMs reported in The Alternatives for Livestock Grazing Table for NFS lands.
19017-1	Sylvia Stubbs	San Juan County	Restrictive and preclusive management prescriptions in some alternatives for programs such as Lands With Wilderness Characteristics, Rights-of-Way, Visual Resource Management and others would preclude infrastructure such as communication towers which would be critical for the health and safety of the public as well as the economy of the County. The plan must include provision for allowance for such or similar infrastructure. Allowance for future infrastructure could still protect Monument objects while providing for public health and safety, a viable County economy, contribute to better coordination among County, tribes and federal and state agencies and overall better management of the Monument. Please add such provision(s) to appropriate sections of the plan.	EJSOC03; LAND01	See the Lands and Realty Management for the Proposed Plan for clarity on which areas fall into each category (open, avoidance, or exclusion). The agencies considered these comments from Cooperating Agencies. Under the Proposed Plan, approximately 47% of BENM would be ROW exclusion, allowing for placement of future infrastructure. On NFS lands, Special Use Permits for ROWs are only excluded in designated wilderness. Agencies would coordinate with local governments on specific implementation level management.
10857-3	Shawn Ivins		As someone that has grown up in the area and is a multi-generational resident, I have concerns about the impacts the most restrictive alternatives of the proposed plan will have on the locals' way of life as well as the economic impact that it will have.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Please see the discussions under each alternative in the Environmental Justice and Social and Economic Values section for the analysis of impacts on economic conditions and way of life for the local communities.
15055-7	Robin Todd	Maryland Ornithological Society	We believe that watchable wildlife, heritage tourism, and the economic benefits of unimpaired wild lands will prove to be more valuable and more sustainable than the alternatives that would expand OHV routes and development of minerals and fossil fuels. We favor preserving local natural resource-based economies and generations-old traditions in southern Utah. With careful planning and	EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Discussion on nonmarket values of open spaces, such as those in the comment, are included Impacts Common to All Alternatives and the impacts under each alternative in the Environmental Justice and Social and Economic Values section. For example, a discussion on the willingness to pay for benefits received through spending time in open spaces, such as increased physical health and reduced potential

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			execution, these industries can remain an integral and essential part of evolving tourism-based economic development, and both sectors can flourish.		health costs from exercise as well as increased enjoyment and quality-of-life, is included the Environmental Justice and Social and Economic Values section.
1577-2	Christopher Bardon		Preserving backcountry airstrips also has a significant economic impact. They contribute to local economies by facilitating tourism and providing jobs related to airstrip maintenance and the services required by visiting pilots and tourists. The closure of these airstrips would not only hinder access but also have a detrimental effect on the economic vitality of the surrounding areas.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Impacts on economic conditions from changes in recreation, including travel and transportation management, are discussed in the Environmental Justice and Social and Economic Values section, under the under Impacts Common to All Alternatives as well as the sections for impacts under each alternative.
17573-75	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The majority of wildlife recreation in the state occurs on public lands like those found in the BENM. In 2021, the Utah State Legislature ⁷¹ amended the states constitution, declaring hunting and fishing an individual right and a valued part of Utahs heritage, promoting wildlife conservation and management, and defining public hunting as the preferred means of managing and controlling wildlife. Wildlife recreation, specifically hunting, contributes \$3.1 Billion ⁷² to the economy nationally; hunting in the BENM surely contributes positively to the state and local economy.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Impacts on economic conditions from changes in recreation, including recreational hunting, are discussed in the Environmental Justice and Social and Economic Values section under Impacts Common to All Alternatives as well as the sections for impacts under each alternative.
1943-2	Andrew Slade		Alternative E is most intentional about economic development in Bears Ears gateway communities. Most or all of these communities are seeking a way to strengthen their local economy and keep families here. Im a big fan of the A&W in Blanding and stop there every chance I get. Focusing recreational developments such as new trailheads and campground near those existing communities will have long-term economic benefit.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Trail development will be considered under implementation-level planning. While Bluff and Mexican Hat are adjacent to the Monument, there are large areas of non-Monument public lands near the towns of Monticello, Blanding, White Mesa, Aneth, and Montezuma Creek that might also be considered for development of mountain bike trail systems.
8999-25		International Mountain Bicycling Association	We recommend that the BLM, at minimum, consider complimentary trail development within the monument nearest the towns which are inevitably seeing an increased interest in the economic and community development potential of mountain biking.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Trail development will be considered under implementation-level planning. While Bluff and Mexican Hat are adjacent to the Monument, there are large areas of non-Monument public lands near the towns of Monticello, Blanding, White Mesa, Aneth, and Montezuma Creek that might also be considered for development of mountain bike trail systems.
12832-6	Jason Keith 243 Aspen Avenue Moab, UT 84532	American Mountain Guides Association	Under Alternative E, SRPs and SUPs would be used to manage different types of recreation associated with commercial uses, organized groups, and special areas. All SRPs would only be allowed if these activities are consistent with the protection of BENM objects. Recreation uses can include, for example, group events, river guide services, and commercial recreation activities. AMGA believes that appropriate rock climbing guiding at Indian Creek in particular is consistent with the protection of monument objects as trained guides are well suited to be the first line of contact with the public regarding Leave No Trace practices, cultural sensitivity, and education of the area. Guides provide valuable interpretation of natural and cultural resources, promote an ethic of conservation and stewardship, and help to foster the next generation of public land advocates. Guiding and outfitting in BENM provides a key opportunity for the guided public to learn about and experience the objects of cultural, historic, and scientific interest that are protected by the BENM designation. Outfitters and guides also support local communities by contributing to the vibrant and growing outdoor recreation economy.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.), ALTO5-Alternative E, REC01-General	The Proposed Plan includes management aimed at educating guides about the cultural history of BENM and proper site visitor etiquette. The Proposed Plan discusses the value to communities that outfitters and guides bring, including increased employment and earning opportunities.
18610-9	Kate Mabry		Utilize volunteers and partners (ALL Americans) due to budgetary restraints to maintain trails, educate the public, assist in maintenance and operations duties.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.), ALTO5-Alternative E	Existing access points, trails, and climbing routes that are consistent with the protection of BENM objects would remain available for use. In collaboration with the BEC, during the development of implementation-level plans and RAMPs, the agencies would identify and restore unused dispersed campsites and redundant and user-created ("social") trails and routes that are impacting BENM objects. Implementation-level plans and RAMPS would be developed with budget in mind, and with an emphasis on public engagement.
18315-5	LISA RARICK		If continued restrictions are placed on the mineral extraction industries or ranchers, the tax base for San Juan County (one of the poorest in the Nation) will be severely hindered. Many people will have to move to find employment elsewhere and for those that have employment not impacted by these industries, we will see an increase in property taxes to make up the difference for those who leave. As a taxpayer in a County where almost is covered by a reservation, I already feel the burden to provide the services the County needs with my tax dollars.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.), ALTO7-Modification of Existing Alternatives	See Issues Considered but Not Analyzed in Detail section for more information on how proposed management would affect mineral rights. Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in Environmental Consequences, Impacts Common to All Alternatives, as well as the impacts under each alternative in the Environmental Justice and Social and Economic Values section.
9372-20	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Grazing is also a critical part of our local economy. We are an agricultural economy in this area. On Page 44 E.S.5.2.5.1 paragraph 1 the management plan states, "Under all alternatives, BENM would continue to support the local and regional economy." As such, the Monument should be promoting the growth and development of grazing as opposed to its reduction.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.), ALTO7-Modification of Existing Alternatives	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values Section, the subheader for Impacts Common to All Alternatives, as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in the Environmental Justice and Social and Economic Values Section, Environmental Consequences, as well as the sections for impacts under each alternative.
18112-8	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	The Bureaus preferred alternative is Alternative E. Draft Plan 2-8. And according to the Bureau, Alternatives D and E are the most restrictive alternatives on recreation, especially with respect to dispersed camping and areas closed to OHV travel; this could lead to a decrease in overall visitors to BENM, which could decrease the economic contributions from recreation. On the other hand, under Alternatives D and E, there could be an increase in recreational expenditures if more recreators stay off-site, which might increase recreation-related economic contributions. Draft Plan ES-24 (emphasis added). The assumption that closing the Bears Ears Plan area to the public will benefit local economies like Blanding Citys is wild it takes a huge leap in logic. See Draft Plan 3-363. Unfortunately, this sort of uninformed decision-making reflects the problem named in the supposedly	EJSOC03-Local Economy (jobs, grazing, visitation, etc.), DATA02-Inadequate Methodologies, REC01-General	The agencies underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, although a use of Monument lands, is not an object of the Monument and will therefore be provided for as long as its provision is consistent with the protection of Monument objects. All alternatives considered therefore align with the purpose and need in that they are designed to provide for recreation and other important and notable uses of Monument lands while protecting Monument objects. The agencies have assessed economic impacts of recreation in Appendix N. Economic contributions from activities on public lands, such as recreation activity, are based solely on the amount of expenditures due to the activity. If expenditures

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			supporting document. See Smith et al. 2021, at 11 (The creation and subsequent downsizing of Bears Ears National Monument . . . decisions . . . were made, by and large, without any information or research into how they might affect outdoor recreation or outdoor recreation-related industries in the region.). There is no demonstrated causal link between taking lands away from the public and improved local economic performance. See id. at 12. If the Bureau has actual information to educate Blanding City and its residents to the contrary, then it should make that information available for review. This sort of contradiction shows that the Bureau did not truly analyze the analyses cited and that the alternative analysis is flawed. When devising resource management plans, the Bureau must act reasonably. See 5 U.S.C. 706(2); New Mexico ex rel. Richardson, 565 F.3d at 709. The determination of what is reasonable is a rational connection between the facts found and the decision made. Nat'l Tr. for Historic Pres. v. Suazo, 2015 U.S. Dist. LEXIS 39380, at *16 (D. Ariz. Mar. 27, 2015) (quoting Humane Soc. of U.S. v. Locke, 626 F.3d 1040, 1048 (9th Cir. 2010)). The Bureaus assertion that there could be local economic benefits attributed to making the Plan area less available is, at best, a guess it is not reasonable.		increase, then economic contributions to the local and regional economy will increase; if expenditures decrease, then economic contributions will decrease. In general, expenditures from recreation could increase due to an increase in total visitors to the area and/or an increase in the amount of spending per visitor. As discussed in the EIS, the increase in restrictions on recreation, under Alternative E, compared with Alternative A, could result in a decrease in visitors, which could result in a decrease in economic contributions; however, if there is an increase in spending (due to more visitors staying off-site), there could be an increase in economic contributions, if the increase in spending per visitor exceeds any reductions in expenditures from decreased visitation. Language was added and revised to the Draft EIS to clarify. Also, see the Proposed Plan for changes to recreation management actions.
18987-6			Fees are not defined and would likely have a socioeconomic impact but eliminating this recreation opportunity for people that cannot afford to pay a fee for a resource that has historically not had a fee implemented. Also, it would seem very likely that this alternative will result in crowding and focus resource damage in those areas instead.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.), DATA02-Inadequate Methodologies	The commenter appears to be referring to recreation fee changes. The Resource Management Plan does not set fees for permits or use fees. This would be done during implementation level planning, and would involve further public review and input, consistent with Federal law and regulation. Unclear as to which alternative the commenter is referring, but the agencies' purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, although a use of Monument lands, is not an object of the Monument and will therefore be provided for as long as its provision is consistent with the protection of Monument objects. The intent of the alternatives for management direction is in themes. You can find a summary of these themes in the Executive Summary.
18657-53	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	UPLA is concerned that restrictions and closure of OHV access in BENM will bear insurmountable negative impact on OHV recreation. This negative impact will directly affect our members and the communities and economies that are situated near BENM and throughout the greater Southwest region of the United States. Closures and restrictions of access will displace OHV riders. This will drive OHV enthusiasts to seek recreation in other areas of Utah and the American Southwest. This will create a higher concentration of people off-roading in other OHV areas, which will create new negative impact on natural and cultural resources in those areas, thus jeopardizing the long-term viability of other OHV areas, and thereby inflicting a snowball effect of harm directly on the OHV recreation community. While anti-motorized groups will no doubt emphasize in their comments the fact that recreation is not an identified object of the Bears Ears National Monument, we note that the proclamation specifically recognized that the monument is home to world class outdoor recreation opportunities including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding that support a booming travel and tourism sector that is a source of economic opportunity for local communities.	EJSOC03-Local Economy (jobs, grazing, visitation, etc.), REC01-General	The agencies underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. See the Recreation and Visitor Services section of the Proposed RMP/FEIS for analysis of impacts to recreation in the Proposed Plan. Additionally, see changes to Proposed Plan under recreation and travel management.
19007-5	Angela Marian		Cultural and Generational Practices: Ranching in areas like Bears Ears is a multi generational operation. Restrictions can threaten this by altering the landscape and making it harder for families to continue their ranching legacy.	EJSOC04	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, are discussed in the Environmental Justice and Social and Economic Values Section, the subheader for Impacts Common to All Alternatives, as well as the sections for impacts under each alternative. Impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in the Environmental Justice and Social and Economic Values Section, Environmental Consequences, as well as the sections for impacts under each alternative.
19007-8	Angela Marian		Generational Legacy: Many families in the area have been ranching, farming, or living off the land for several generations. These families have built a legacy of working the land, often with parents, children, and grandparents all contributing. The monument can disrupt this and make it harder for families to continue their way of life.	EJSOC04	See the environmental justice and historic resources sections for analysis related to local community impacts. The Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 97% of BENM lands that are currently available would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19007-9	Angela Marian		10. Shared Experiences: Working together on the land creates opportunities for families to bond over shared experiences. From early mornings spent rounding up cattle to late afternoons gathered around eating together after a long, hard, honest day of work. These moments become cherished family memories. Losing access to land due to new restrictions can mean losing these opportunities for family bonding and the creation of new memories. 11. Cultural Practices: For many families, practices such as hunting, fishing, and horseback riding are inegral to their way of life. These practices are often tied to the land and the seasons, forming an important part of family traditions and local culture. Restrictions to do so can mean a loss of cultural heritage and a disconnect from practices that have been passed down through generations.	EJSOC04	The Environmental Justice and Social and Economic Values section includes management to collaborate with the BEC and grazing permittees when developing grazing permit terms and conditions. Additionally, the NEPA Process includes coordination with stakeholders which includes local ranchers and permit holders. Additionally, see the Proposed Plan under the rection and travel management sections for management actions regarding non-motorized travel. Horseback riding will still be allowed under the Proposed Plan.

Table U-13. Fuels/Fire Management

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17573-110	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	ES-5.2.4 Fuels, Wildfire, and Prescribed Fire On page ES-23, FFSL has concerns about Alternative E which has less emphasis on treatments in the WUI and recreation sites, which could increase fire risks for communities. FFSL recommends the BLM consider Alternative C, which utilizes the same fire and fuels management approach for protecting cultural resources but places greater emphasis on fuel and vegetation treatments in areas with motorized access, high visitation, and developed recreation facilities to reduce fire risk. This approach balances natural and cultural resource protection with health and human safety when compared to the other Alternatives.	FIRE01-General	Thank you for your comment.
17573-113	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	ES-5.1.14 Air Quality On page ES-20 the plan states, Under Alternatives D and E, impacts from management actions for vegetation management and prescribed fires would use a landscape-wide approach for restoring natural fire, which would have indirect, long-term effects to the extent that it creates more resilient vegetation communities that are less prone to wildfire. In the short term, however, it could lead to a greater prevalence of wildfire, which could impact air quality. FFSL requests the BLM coordinate these activities with FFSL.	FIRE01-General	Agencies will coordinate with state and local governments in development implementation-level fire plans.
9255-9	Keith Alleman		Regarding fire management, I would limit the discretion implied in the clause "Mechanical treatments would only be used to safeguard/protect BENM objects." There is a risk that mechanical treatments would be approved everywhere, on the notion that they protect some BENM object from some hypothetical future fire that could otherwise run out of control. I would suggest specific limiting language like "Mechanical treatments would only be used to protect BENM objects and would be limited to actions (such as fuel load buffer zones) within a quarter-mile [or whatever] of the BENM object(s) being protected."	FIRE01-General	See the Proposed Plan for fuels and vegetation management actions. Light-on-the-land techniques would be used wherever practicable and in designated wilderness and WSAs. Vegetation management, among other objects, would emphasize protection of BENM objects.
9372-12	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Under all alternatives, firefighter and public safety remain the top priorities for fire management in BENM.(Page 43) Clearing land can make it safer from fire hazards, mold, and viruses that rotted trees can harbor. It can also provide unobstructed paths for emergency vehicles and maintenance crews to access infrastructure.	FIRE01-General	The Fuels, Wildfire, and Prescribed Fire Affected Environment section in Appendix N notes that fuels management projects in the area have been increasing recently to improve vegetation resilience to disturbance, including wildfire. Under the Proposed Plan, fire and fuels management would be used to maintain healthy ecological resources.
18965-15	Simone Griffin	BlueRibbon Coalition	Vegetation treatments that reduce wildfire risk might compromise the current scenery integrity or non motorized recreation opportunity, but if a wildfire happens the impact of the fire will likely cause a greater impact to both of these values. Decision makers should be able to make balance-of-harm or benefit determinations for these resource management activities instead of being required to meet arbitrary objectives. The BLM/USFS should be using non-fire techniques such as mechanical thinning as often as possible to keep the forest healthy and thriving. These techniques are the most effective in preserving wildlife, trails and cultural sites. We prefer proactive management within the forest to avoid closures. Any area managed as Wilderness is a great threat to wildlife and habitat as many vegetation treatments cannot move forward based off of these designations and wildfire can completely destroy ecosystems and habitat.	FIRE01-General, ALT07-Modification of Existing Alternatives	Thank you for your comment. The Vegetation Section in Chapter 2 provides management on collaborating with BEC in identifying treatment priorities with the goal of maintaining or improving vegetation conditions to minimize uncharacteristic fire risk.
17969-12	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Vegetation & Forestry and Woodlands TNC recommends that the Proposed RMP/Final EIS allow for mechanical treatments when necessary and in consultation with the BEC for the protection of BENM objects, such as allowed in Alternative B. In order to properly manage for fire mitigation and implement restoration work to restore ecological functions, mechanical treatment will be needed, such as for thinning or mastication of pinyon juniper. TNC also recommends that control burns and let burn areas be added to the preferred Alternative.	FIRE01-General, ALT07-Modification of Existing Alternatives, FOREST01-General	The range of alternatives analyzed in the RMP/EIS include varying levels of vegetation management and methods (Fire Management and Vegetation sections in Chapter 2). Prior to approval of any site-specific proposals for vegetation treatment, the BLM and USDA Forest Service would perform any necessary environmental analysis and reviews, including a determination of whether the activity is consistent with the proper care and management of BENM objects and values. This evaluation would include cultural resource surveys, impact analyses, and identification of any applicable mitigation actions. The use of fire and mechanical treatments, except for chaining, are allowed in the Proposed Plan.
16784-34	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	If any prescribed fire of such lands is needed, such lands should be expeditiously, but properly and adequately, surveyed for paleontological resources (and mitigated or excavated if necessary) by qualified paleontologists prior to the burn. If any excavation of scientifically significant paleontological resources is deemed necessary in such areas, flexibility for allowing surface disturbances to protect	FIRE01-General, ALT07-Modification of Existing Alternatives, PALEOGE003-Paleo	Prior to implementation of a prescribed fire, site specific NEPA would be completed, which may include a survey for paleontological resources. In the Proposed Plan, paleontological surveys would be conducted in areas with a PFYC Class of 3, 4, 5 or U for discretionary actions. Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			and preserve the paleontological resources as well as the use of mechanical tools for their extractions should be permitted to qualified paleontologists on a case-by-case basis. SVP asks that any decision-making should be made in consultation with the agency's qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).		
7328-1	Justice Fife		I am concerned about the feasibility of implementation of some of the alternatives. Many are great on paper but hard to follow through on with current staffing. Most notably no fire hand line in or around arch sites. The monument has very few red carded archs to facilitate this. I would recommend giving provisions for IA to go so that it possible to surpass without waiting for an archaeologist to engage, and when possible have an arch clear all landlines ahead of operation. I have been involved in fire archaeology for many years and have a lot of experience and know value of protecting the cultural resources but being able to stop a fire in a timely manner is more beneficial than having a low impact handline going through a stie. To follow E with the current plan you would have to have archaeoligst on every engine or module and that is not feasible. Overall I encourage on stong look at what it would take to implement many of the options in E and evaluate its feasibility.	FIRE01-General, ARC01-General, ALT05-Alternative E	Under the Proposed Plan, the agency's fire management decisions and actions would consider avoiding the construction of line within 50 feet of an archaeological site. See the Alternatives for Fire Management table in the Fire Management Section in Chapter 2. The proposed presents a feasible approach to protecting cultural sites in balance with priorities.
14767-12	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	As discussed in these comments as well as literature provided under the CX references, the fire return intervals used by the BLM are entirely without scientific basis. You cant have a 0-35 year FRI in a forested or shrub system. Its simply impossible. The FRI of PJ is in the range of multiple centuries	FIRE01-General, DATA02-Inadequate Methodologies	The methodology that the agencies use to determine Fire Regime Groups, which includes the Fire Return Interval discussed in this comment is applicable to the BENM RMP/EIS, but is applied at the implementation level. The appropriate Fire Return Interval can be chosen on a site specific basis. Methodologies regarding resource conditions related to fire management are established in the agencies' Fire Management Plans (FMPs).
14767-13	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Baker and Shinneman, 2004 thoroughly examined historical fire in juniper and pinyon ecosystems and concluded that stand replacement fire was historically infrequent (400-480 years), and low-severity surface fires were uncommon. As such, prescribed fire is not generally needed to maintain these habitat types (Bauer and Weisberg 2009). Local research is essential to determine historic fire return intervals for a given area. Romme 2009 concluded that increases in juniper density may be attributed to natural range expansion, recovery from past disturbance, and changing climate. See also Welch and Criddle 2003, Gruell 1999.	FIRE01-General, DATA03-Suggest Additional Data Source	Chapter 3 and Appendix N include analysis of historical fire regimes. The Proposed Plan allows for a wide variety of treatments which would be considered through implementation level planning through site specific analysis.
17573-59	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The Utah SRMP contains numerous provisions relating to responsible woodland and forestry practices. For example, the SRMP states that it is the States position that public lands be managed for multiple uses, sustained yields, prevention of waste of natural resources, and to protect the health, safety, and welfare of the public. The BENM fuel reduction and wildfire prevention plan should incorporate forest and woodland harvest to achieve those goals. Wildfire poses a serious risk to a variety of objects throughout the monument which could be reduced through strategic fuelwood gathering. The SRMP makes it a priority to ensure a sustainable supply of firewood for the State.	FIRE01-General, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	See the Proposed Plan for management actions for fuelwood gathering in order to assist with fire risk reduction. In accordance with FLPMA, the Proposed Plan is consistent with state and local plans to the maximum extent possible. The Utah SRMP goals and objectives were taken into consideration during the development of the Proposed Plan. Fire and fuels reduction projects would be assessed through implementation level planning and site-specific analysis.
16784-19	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Therefore, if any prescribed fire (controlled burns) of lands needs to be conducted, such lands should be expeditiously, but properly and adequately, surveyed for paleontological resources (and mitigated or excavated if necessary) by qualified paleontologists, including BLM or USFS paleontologists, prior to the burn.	FIRE01-General, PALEOGE003-Paleo, ALT07-Modification of Existing Alternatives	Prior to implementation of a prescribed fire, site specific NEPA would be completed, which may include a survey for paleontological resources. In the Proposed Plan, paleontological surveys would be conducted in areas with a PFYC Class of 3, 4, 5 or U for discretionary actions.
8919-2	Rob Russell Quincy, CA 95971		In some areas, wildfire likely poses significant concern to the long term landscape/ vegetation/ wildlife health in the Monument. This is a difficult issue. As part of my broader support for Tribal Stewardship Co- Management on all Monument lands, wildfire threat may seemingly be "best managed" using more of a "traditional Indigenous knowledge/ traditional ecological knowledge" approach, including within lands with "special protections" such as WSA's.	FIRE01-General, TIK01-Traditional Ecological or Indigenous Knowledge	As discussed in the Fuels and Fire Management, Impacts Common to All Alternatives Section in Appendix N, the agencies will collaborate with the BEC and Tribal Nations to implement a consistent, safe, and cost-effective fire management program through appropriate planning, staffing, training, and equipment. Management objectives and actions would be based on sound science and Traditional Indigenous Knowledge.

Table U-14. Lands and Realty

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19000-2	Doug Allen		The addition of ROW exclusions proposed in Alternative E is totally an outrage and unnecessary. The BEM currently has some 450,000 acres under ROW exclusions. It is not wise to have 98% of BEM with these exclusions. It will be a detriment to public safety with no possibility of improvement to cell phone service, fire fighting protection, search and rescue. It also will tie up the land use for all other activities.	LAND01	See the Lands and Realty Management Section for the Proposed Plan for clarity on which areas fall into each category (open, avoidance, or exclusion). The agencies considered these comments from Cooperating Agencies. Under the Proposed Plan, approximately 47% of BENM would be ROS exclusion, allowing for potential placement of future infrastructure. On NFS lands, Special Use Permits for ROWs are only excluded in designated wilderness. Agencies would coordinate with local governments on specific implementation level management
19000-4	Doug Allen		Do not prohibit commercial filming. This country is blessed with incredible scenery and has been economically helped with both movie, TV and commercial filming over many years. Many times locals have been well paid for appearing as extras.	LAND01	See changes to the Proposed Plan under the Lands and Realty Section in Chapter 3. The agencies have adjusted management actions for film permitting.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19016-1	Linda Patterson cactuschic@gmail.com		There are several parcels of private property surrounded by the BENM boundaries. Yet these private Lands are not a part of the monument. As an owner of one of these private properties. I firmly believe that is wrong for the BENM management personnel to close and prevent utility corridors from going to private property.	LAND01	Under the Proposed Plan, ROWs or SUPs may be granted/authorized reasonable access to non-federal inholdings consistent with the protection of BENM objects. See Chapter 3 Environmental Justice and Social and Economic Values in the Environmental Consequences section for discussion of impacts to TLA parcels from OHV area designation. See the Proposed Plan under the Travel and Transportation Management section in Chapter 2.
19017-39	Sylvia Stubbs	San Juan County	Appendix M- Amendment Language to Manti-LaSal National Forest Land and Resource Management Plan p.M-3 Standard It appears that referencing Appendix G for the Bears Ears Management Plan in the revised Standard is an error. Appendix G is Best Management Practices which are implementation practices under the umbrella of management prescriptions in the BEM Plan. We recommend deleting reference to Appendix G and leaving the Standard to read " ... shall be managed per the Bears Ears National Monument Resource Management Plan."	LAND01	Part of the amendment language referred to by the commentor is the current amendment language in the Manti-La Sal LRMP, in which appendix G was an appendix to the LRMP and was direction for the Shash Jaa unit. The replacement standard language has been edited to remove the reference to Appendix G in the replacement standard language.
17601-2	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	ADMINISTRATIVE ACCESS (OR VAGUE PROMISES THEREOF) IS INSUFFICIENT TLA requires full public access to trust lands to realize the lands full economic value. Administrative-only access across federal lands to TLA properties hinders us from realizing our holdings' full economic potential. Such access cannot be transferred to our lessees or permittees and cannot be assigned to successors in interest. Non-transferable access rights severely compromise the utility of TLA properties and diminish their market value. Furthermore, vague promises that access issues regarding trust lands will be resolved at some future time are insufficient, as experience has shown that these promises are rarely fulfilled, if ever.	LAND01-General	Under the Proposed Plan, ROWs or SUPs may be granted/authorized reasonable access to non-federal inholdings consistent with the protection of BENM objects. See the Environmental Justice and Social and Economic Values in the Environmental Consequences section in Chapter 3 for discussion of impacts to TLA parcels from OHV area designation. See the Proposed Plan under the Travel and Transportation Management section in Chapter 2.
17601-7	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	RIGHT-OF-WAY EXCLUSION AREAS Under the federal agencies preferred Alternative E, 98% of the BENM would be placed under a right-of-way exclusion area. Alternative C & D also place large portions of the BENM under right-of-way exclusion areas. Such broad, sweeping, and restrictive designations over large areas would severely and unnecessarily limit the placement of future infrastructure that may be needed for monument management and support of local needs. Such infrastructure projects should be carefully analyzed on their own merits, purpose, and need as they come up rather than categorically barring them from any future consideration.	LAND01-General	See the Lands and Realty Management for the Proposed Plan for clarity on which areas fall into each category (open, avoidance, or exclusion). The agencies considered these comments from Cooperating Agencies. Under the Proposed Plan, approximately 47% of BENM would be ROS exclusion compared to 98% under the preferred alternative, allowing for potential placement of future infrastructure. Additionally, the agencies added open ROW zones along major highways based on input from cooperators. On NFS lands, Special Use Permits for ROWs are only excluded in designated wilderness. Agencies would coordinate with local governments on specific implementation level management.
18713-5	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	In 2016, all five Tribes of BEITC asked that future uranium leasing be closed off and that the BENM boundary be drawn to protect lands holding the potential to be mined. The final boundary of BENM unfortunately appears to have been reduced specifically to allow as much uranium mining and exploration as possible (see Black Mesa and White Canyon rim exclusions). In May 2024 the Biden administration increased demand for uranium mining adjacent to Bears Ears, and increased uranium processing at the White Mesa mill. See news article. Ute Mountain Ute and Navajo Tribal members have been negatively impacted by the uranium cycle to a greater degree than other communities in the United States. Additional efforts need to be made in this management plan to clean up contaminated sites on BLM lands, close off abandoned mines, close roads that lead to these sites, and test soils currently being used by dispersed campers and test waterways upstream of UMU Allotted Lands in Allen Canyon. Tribes mention air quality concerns due to uranium transport and dusting of areas within and immediately adjacent to BENM. Transportation of uranium ore through BENM roads should be prohibited in this management plan.	LAND01-General	Proclamation 10285 appropriated and withdrew BENM from all forms of entry, location, selection, sale, or other disposition under the public land laws or laws applicable to the BLM and USDA Forest Service, from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing other than by exchange that furthers the protective purposes of BENM. As a result, BENM is closed to oil and gas, geothermal, coal, and nonenergy solid minerals leasing and closed to location of mining claims under the Mining Law of 1872. While the analysis for many resources may extend beyond the boundaries of the Planning Area, plan decisions only apply to lands within the national monument. Please refer to the Geology and Minerals section in Chapter 2, Chapter 1 for Issues Considered but Not Analyzed In Detail for rationale of minerals proposed management in the Decision Area and to the Air Quality section in Chapter 3. The Proposed Plan, in the geology section in Chapter 2, also discusses AML cleanup and that the agencies would work in collaboration with the BEC to continue work on AML cleanup. The BLM will address travel management planning for the BENM Travel as part of implementation level planning after the RMP is complete.
17573-106	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.19.2 Lands and Realty (page 2-72) Management actions common to all alternatives- should address discussion and the need for recreational shooting ranges within the BENM and those areas would be identified in coordination with the DWR.	LAND01-General, ALT07-Modification of Existing Alternatives	Thank you for your comment. The Agencies will continue to coordinate with the State on implementation level planning considering recreation in the BENM.
17601-13	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	LAND EXCHANGES Presidential Proclamation 10285 directs the Secretary of the Interior to explore an exchange of land owned by TLA within the BENM for lands managed by the BLM of approximately equal value located outside the boundary of the monument. It further states consolidation of lands within the monument boundary through exchange in this manner provides for the orderly management of public lands and is in the public interest. Under Section 2.4.19.2 of the RMP/EIS it states that acquisition of lands or interests therein within the BENM would be pursued with willing sellers or by donation. The RMP/EIS should be clarified to clearly state that acquisition of lands within the monument by exchange is also permitted as directed by the Proclamation. On February 6, 2024, Gov. Spencer Cox, Senate President Stuart Adams, and Speaker of the House Mike Shultz released the following statement: Utah has sought for a collaborative, inclusive approach to managing our public lands, including in the management of the Bears Ears National Monument, yet the Biden administration continues to ignore our good faith input. The federal government has signaled that it once again plans to adopt a restrictive land management plan that will harm recreational access, grazing, and other traditional public uses of these lands. When the administration is prepared to have a serious and good faith collaborative discussion about land management, we stand ready to renew discussions of a land exchange. The presence of more than 125,000 acres of state trust lands within BENM and our accompanying mandate to generate revenue from those lands will inevitably lead to management conflicts within the monument. TLA is hopeful that the federal agencies will seriously consider the concerns expressed in our comments and in the comments submitted by other	LAND02-Land Exchange	The agencies have adjusted the Proposed Plan based on input from Cooperating Agencies including the State of Utah, San Juan County, and TLA. As stated in the Lands and Realty section of Chapter 2 of the RMPs/EIS, acquisition of lands within the Planning Area would be pursued where it would provide for the proper care and management of the objects for which the Monument was designated. As stated in the cumulative impacts section in the Lands and Realty section in Chapter 3, two pieces of legislation, both entitled the Utah School and Institutional Trust Lands Administration Exchange Act of 2023, have been introduced in Congress. If enacted, both bills would direct the BLM to acquire approximately 162,500 acres of lands and interests in lands located largely within the exterior boundaries of BENM and managed by the Utah Trust Lands Administration in exchange for the Utah Trust Lands Administration acquiring approximately 167,000 acres of public lands located throughout the state of Utah. If acquired by the BLM, the lands and interests in lands located within the exterior boundaries of BENM would become part of the Monument and managed accordingly. Any acquired lands would be managed the same as adjacent lands in the Planning Area unless they required specific management related to Monument objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			Cooperating Agencies, including the State of Utah and the San Juan County, and make the necessary changes to the planning process and proposed management plan to facilitate further discussions of a land exchange effort.		
16020-3	Gatch Peter		Regarding the SITLA parcels in the Monument. To me they seem like a simmering Bears Ears problem. If the parcels are never traded out of Bears Ears then access to many of the parcels should be heavily regulated across BLM lands. Limited access - perhaps seasonal, size of access vehicle, limited number of visits in a year, authorized persons only, locked access gates, might be some of the regulations that persons would have to access the sites across BLM lands. These and other regulations would be for obvious reasons to maintain the incredible character of the Bears Ears National Monument. For example, an unrestricted SITLA access road across BLM lands could become an unintended public ORV road damaging sensitive lands.	LAND02-Land Exchange, ALTO7-Modification of Existing Alternatives	In the Proposed Plan in the Lands and Realty section, ROWs or SUPs may be granted/authorized to access non-federal inholdings so long such a grant/permit is consistent with the protection of BENM objects.
18556-9	Stan		The alternatives have apparently not been updated to reflect the State of Utahs withdrawal of the Memorandum of Understanding to conduct the exchange of Trust Lands Administration (TLA formerly SITLA) properties for other federal properties in the state. The BLM should not restrict access to state lands by closing roads.	LAND02-Land Exchange, ALTO7-Modification of Existing Alternatives	The agencies have adjusted the Proposed Plan based on input from Cooperating Agencies including the State of Utah, San Juan County, and TLA. As stated in the Lands and Realty section in Chapter 2 of the RMP/EIS, acquisition of lands within the Planning Area would be pursued where it would provide for the proper care and management of the objects for which the Monument was designated. As stated in the cumulative impacts section in the Lands and Realty section in Chapter 3, two pieces of legislation, both entitled the Utah School and Institutional Trust Lands Administration Exchange Act of 2023, have been introduced in Congress. If enacted, both bills would direct the BLM to acquire approximately 162,500 acres of lands and interests in lands located largely within the exterior boundaries of BENM and managed by the Utah Trust Lands Administration in exchange for the Utah Trust Lands Administration acquiring approximately 167,000 acres of public lands located throughout the state of Utah. If acquired by the BLM, the lands and interests in lands located within the exterior boundaries of BENM would become part of the Monument and managed accordingly. Any acquired lands would be managed the same as adjacent lands in the Planning Area unless they required specific management related to Monument objects.

Table U-15. Livestock Grazing

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19007-1	Angela Marian		Grazing Restrictions: Monument status often brings new regulations that can restrict grazing areas or the number of livestock allowed. These restrictions can reduce the carrying capacity of the land for livestock, directly impacting ranchers and their income.	GRAZO1	The Proposed Plan does alter currently allocated AUMs as outlined in the Chapter 2 Livestock Grazing. Any reductions that are determined to be necessary due to the reduction of acres available to grazing would be done at the implementation planning level. The impacts of the Proposed Plan to livestock grazing and permittees is disclosed is the Livestock Grazing section in Chapter 3 where it is recognized that restrictions could have an impact on permittees.
19007-4	Angela Marian		Limited Access to Resources: Restrictions on land use can limit ranchers access to essential resources like water and forage. Traditional practices, such as moving livestock between grazing areas seasonally, may be disrupted, affecting the health and productivity of their herds.	GRAZO1	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Any restrictions on grazing activities are done to protect BENM objects to align with Proclamation 10285. Access that is limited to the general public can still be granted to permittees if the permitted access is consistent with protecting BENM objects.
19014-2	Linda Patterson cactuschic@gmail.com		However, the grazing allotment owners and the Federal Government have historically engaged in co-management of the grazing allotments. This co-management is the permit system. The grazing permits are signed by both a representative of the Federal Government and the Grazing allotment owner in an agreement as to how the grazing allotment will be managed. The agreement is a permit or a contract. The BLM and Forest Service have incorporated these grazing contracts (permits) into the management of the BENM. This is just wrong. The Grazing Allotment owners are partners or co-managers of these grazing permits and have not been ask nor given their consent to include their grazing allotments or management of their grazing allotments into the draft RMP. Alternative E adds a third party, the BEC, to the already agreed upon and signed permit contracts, without the permission of one of the parties already on the contract. This should be illegal. The BEC is a indigenes' religious cultural organization. It would be racist to give them authority over grazing, grazing allotments, including forage and pertinent water resources. The grazing, grazing allotments, including forage and water resources pertaining to the grazing allotments, should be managed under Alternative A, which is the no action alternative. This keeps the grazing permits legal and out of monument management.	GRAZO1	Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Service's cooperative agreement with the BEC. The permit holder is always included when making decisions about their permits. In addition, Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, subject to existing laws and regulations. These regulations require coordination and consultation with interested publics and governmental agencies.
19017-30	Sylvia Stubbs	San Juan County	p. 2-126 Voluntary Relinquishments The 5th bullet statement includes instruction to "manage the lands previously subject to the voluntarily relinquished permit or lease consistent with the goats and objectives for Wildlife and Fisheries in Section 2.4.11.1. " It is unclear why wildlife and fisheries were selected over all the other objects in the BEM for management. It may be more reasonable to manage these lands for watershed or rangeland health.	GRAZO1	The fifth bullet is addressing forage specifically. If the grazing permit or lease was voluntarily relinquished the agencies would manage the forage associated with the relinquished permit or lease consistent with its use by wildlife in the Wildlife and Fisheries section.

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19017-31	Sylvia Stubbs	San Juan County	p. 2-127 Forage Utilization Levels Alternative E includes the statement "Utilization levels would take forage needs of wildlife into consideration." This statement should be deleted as this is standard procedure for the agencies in determining utilization levels and is unnecessary in this document.	GRAZ01	This standard policy is included for clarity.
19026-4	Brian Carlstrom	National Park Service	ES-28 ES-5.2.9 Livestock Grazing This summary statement does not include the benefits to BENM resources (soils, vegetation, water resources, etc.) that making additional lands unavailable or unsuitable for livestock grazing would provide or enhance. It only includes the potential negatives to this change. Recommend adding language on the beneficial impacts of closing areas to livestock grazing.	GRAZ01	The impacts of the Proposed Plan, including the beneficial and adverse effects of changes to livestock grazing, are analyzed throughout Chapter 3. The Executive Summary, Livestock Grazing section, has been updated in response to this comment.
19035-6	Gail Johnson		The BEC via the Inter-Tribal Coalition shows a prejudice against livestock grazing when they state that livestock grazing is a "threat to the monument". 2 A Navajo council delegate made a public negative remark about livestock grazing in the monument. 3 I do not think the grazers will be treated objectively by the BEC or InterTribal Coalition. The livestock grazers within the monument must be treated with respect and fairness, as should all the user groups. To elevate the BEC/Inter-Tribal Coalition above other user groups will create confusion and conflict. It will also add another costly layer of bureaucracy on an already slow and inefficient system.	GRAZ01	Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Services' cooperative agreement with the BEC. The permit holder is always included when making decisions about their permits. In addition, Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, subject to existing laws and regulations. These regulations require coordination and consultation with interested publics and governmental agencies
19017-27	Sylvia Stubbs	San Juan County	2nd and 5th bullets: Grazing permittees are omitted in these statements and must be included. This would be consistent with BLM and FS grazing management policy to include consultation and coordination with grazing permittees in managing rangeland resources and livestock grazing. This affords permittees the opportunity to provide their knowledge gained from experience on the land and gives them the opportunity to "buy in" to decisions and just makes practical sense to do so. Please add grazing permittees to these statements.	GRAZ01; PUBL01	Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. The permit holder is always included when making decisions about their permits. See changes in the Proposed Plan in Chapter 2 under the section for livestock grazing this language has been adjusted and includes grazing permittees.
19017-9	Sylvia Stubbs	San Juan County	p. 2-50 Table 2-10 Fence Locations In determining fence locations and fence standards the agencies must also coordinate with grazing permittees and UDWR in order to make the best decisions. Please add these entities to this prescription.	GRAZ01; WILDFISH01	Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. The permit holder is always included when making decisions about their permits. In addition, Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, subject to existing laws and regulations. These regulations require coordination and consultation with interested publics and governmental agencies.
719-5	Sarah Graham		RMP/EIS Section 2.4.22.2 indicates that grazing limitation may be prescribed to ensure resource rest in recreation areas. There is no allowance however for prescribing grazing exclusion for the purposes of ecological recovery, as there is for forest product harvest activities (in Section 2.4.8.3). Therefore, the third management action in Section 2.4.22.2 should read (my additions in brackets): "If monitoring indicates that domestic livestock grazing is adversely impacting the protection of [vegetation, wildlife, soil, water resources, or] BENM objects, appropriate changes to livestock grazing management [(which may include grazing exclusion)] would be used to mitigate those impacts in a manner that ensures protection of [vegetation, wildlife, soil, water resources, and] BENM objects."	GRAZ01-General	The objects included in brackets fall under the definition of BENM objects. In the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewals will be guided by current land health evaluations. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Grazing exclusion is already allowed as a management tool for livestock management that can be used to protect objects.
1159-1	Howard Cohen		Please improve Alternative Es management of livestock grazing in the final plan by setting utilization levels at 30% until you determine if a higher level of grazing is still protective of monument objects and values, or, preferably, reducing external livestock grazing to zero to preserve the local ecosystem.	GRAZ01-General	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely.
1192-1	David Huls		And stop grazing cattle and sheep on this land. They totally destroy riparian areas and overgraze the grasses.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. As outlined in the Water Resources section of Chapter 2, agencies will protect and restore water resources, including riparian areas, wetlands, springs, and seeps. The Water Resources section outlines that riparian and wetland resources would be managed for PFC; manage water resources for quality and quantity. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. Chapter 2 discusses alternatives considered but not analyzed in detail, including a no grazing alternative.
1473-2	Lis		Keep grazing permits /areas to specific areas to ensure no harm is done.	GRAZ01-General	The Proposed Plan in the Livestock Grazing section includes areas that are available/suitable and unavailable/unsuitable to grazing.

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14767-125	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Protect the historical and cultural significance of this landscape. While this is cited as one of the purposes and needs for the RMP, the DRMP fails to implement any requirements or limitations to protect archi resources from the primary source of degradation and destruction, livestock grazing. While you have to leash your 15 pound dog at all times to protect archi resources from pets, tens of thousands of 1,400 pound cows can wander where they like with no restrictions. The inane excuse provided by one BLM employee that dogs must be leashed in the RMP because there is no permitting process while livestock are permitted is ridiculous with the slightest understanding of BLM management. The BLM no longer does NEPA on allotment permits. Terms and conditions have remained the same for decades.	GRAZ01-General	Cultural resources are considered an object within BENM, and the Livestock Grazing section states manage livestock grazing, subject to appropriate terms and conditions, in a manner consistent with the protection of BENM objects. In addition, this section states if monitoring indicates that domestic livestock grazing is adversely impact the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts in a manner that ensures protection of BENM objects. Also, Management Actions by Alternative in the Livestock Grazing section outlines areas unavailable to livestock grazing that have locations with sensitive historical and cultural resources. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals. See the Cultural Resource section in Appendix N for a discussion of impacts to cultural resources from livestock grazing.
14767-166	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Moving into Chapter 3, 3.1 the BLM lists its assumptions that are presumed true. But, unfortunately, most are patently false: Implementation-level actions necessary to execute the planning-level decisions in the RMP/EIS would be subject to subsequent decision-making processes that comply with applicable laws, including NEPA. By far, the most extensive use of BENM is livestock grazing, but FLPMA 402c2 exempts permit renewals from NEPA. The BLM is addicted to 402c2 and its extremely rare that NEPA is ever done on permit renewals in BENM. The vast majority of the allotments within BENM have never undergone NEPA since the statute was passed well over half a century ago. Based on data in RAS, it appears that none of the 23 allotments in BENM have had NEPA in the last 2 decades. Nothing provided in the EIS or DRMP would indicate a course correction. As such, to assume that there would be a 180 degree turn around on signing of the ROD, would be a risky bet, at best.	GRAZ01-General	The Proclamation 10285 outlines the Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects. This includes FLPMA. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.
14767-168	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Section 1.5 provides 14 supposed BMPs. None are mandatory. None have been or will be terms and conditions. 1. Grazing management practices will be implemented that do the following: a. Maintain sufficient residual vegetation and litter on both upland and riparian sites to protect the soil from wind and water erosion and support ecological functions. b. Promote attainment or maintenance of proper functioning condition riparian/wetlands areas, appropriate stream channel morphology, desired soil permeability and infiltration, and appropriate soil conditions and kinds and amounts of plants and animals to support the hydrologic cycle, nutrient cycle, and energy flow. c. Meet the physiological requirements of desired plants and facilitate reproduction and maintenance of desired plants to the extent natural conditions allow. d. Maintain viable and diverse populations of plants and animals appropriate for the site. e. Provide or improve, within the limits of site potentials, habitat for threatened or endangered species. f. Avoid grazing management conflicts with other species that have the potential of becoming protected or special status species. g. Encourage innovation, experimentation, and the ultimate development of alternatives to improve rangeland management practices. h. Give priority to rangeland improvement projects and land treatments that offer the best opportunity for achieving the Standards for Rangeland Health and Guidelines for Grazing Management for BLM Lands in Utah (BLM 1997) or USDA Forest Service Rangeland Ecosystem Analysis and Monitoring Handbook (USDA Forest Service 2005a). How will these be implemented when there is never a full NEPA process? What actually is (A)? This could be virtually anything. How does such a meaningless aspiration actually protect anything? Has there been any scientific research on the effectiveness of this supposed BMP? For (B), we have discussed that PFC does nothing to protect or restore objects because it is far below the level needed even for protection let alone restoration. So even if it were ever implemented it would provide no protection of objects. For (C), most allotments are grazed every year during the spring which does not meet the physiological needs of the plants. They are also grazed most of the rest of the year, so significantly reduced seed for reproduction. Again, without changes in the mandatory terms and conditions this is merely a waste of ink. (D) is more general, meaningless aspiration and does nothing to actually protect and restore the objects, even if it were implementable in practice. All these are meaningless fluff to fool a casual reader.	GRAZ01-General	All BLM permits include the following stipulation: Grazing management practices will comply with Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah (1997). All USDA Forest Service would follow stipulations in USDA Forest Service Rangeland Ecosystem Analysis and Monitoring Handbook (USDA Forest Service 2005a). This is very similar to what is included in Appendix G. These BMPs protect or restore objects. Included in the Livestock Grazing section of Chapter 2.The agencies would prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments, to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of the ROD. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals. The Proposed Plan in The Livestock Grazing, Soil Resources, and Water Resources sections include management actions for the protection of water resources and soil resources.
14767-172	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Feeding of hay and other harvested forage (which does not refer to miscellaneous salt, protein, and other supplements), for the purpose of substituting for inadequate natural forage will not be conducted on BLM lands other than in a) emergency situations where no other resource exists and animal survival is in jeopardy, or b) situations where the Authorized Officer (BLM)/Responsible Official (USDA Forest Service) determines such a practice will assist in meeting a standard or attaining a management objective. The reason there would be inadequate natural forage is only because of BLM mismanagement. This again is focused on supporting livestock production and has nothing to do with the restoration of objects. And if that were not bad enough, you have written a massive loophole where the BLM simply has to state that feeding operations will assist in attaining a management objective whatever that may be.	GRAZ01-General	The Proposed Plan states "Do not authorize maintenance feeding (provision of fodder that serve the bulk of dry matter forage) on public lands, regardless of drought, unless an emergency arises (e.g., deep snow prevents stock from being removed from BENM). Remove livestock on rangelands that do not supply the dry matter diet requirements of livestock."
14767-173	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	On rangelands where a standard is not being met, and conditions are moving toward meeting the standard, grazing may be allowed to continue. On lands where a standard is not being met, conditions are not improving toward meeting the standard or other management objectives, and livestock grazing is deemed responsible, administrative action with regard to livestock will be taken by the	GRAZ01-General	The Proclamation 10285 outlines the Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that

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			Authorized Officer (BLM)/Responsible Official (USDA Forest Service) pursuant to CFR 4180.2(c). Firstly, this only applies if an assessment and determination is completed, which is extremely rare. Then there is the issue that Utah Rangeland Health Standards are far below the level needed to either protect or restore objects. So determining an allotment is meeting Standards tells you nothing about whether it is fully allowing all object to be protected and restored. The Forest Service doesnt even have any similar Standards.		livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan includes prioritizing 6 allotments for the completion of rangeland health assessments within 3 years of the signing of the ROD.
14767-196	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Livestock grazing has the potential to cause impacts on soil resources, with the level of impacts dependent on the intensity and duration of grazing, range site potential, local climate and weather conditions, and seasonal timing of use. So again, the BLM admits that continued livestock grazing fails to comply with its mandate to protect and restore objects, yet it moves ahead regardless.	GRAZ01-General	The Goals and Objectives of the Livestock Grazing section in Chapter 2 and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
14767-197	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Depending on site conditions and methods, improper grazing can cause vegetation loss, loss of BSC, increased nutrient loading, soil compaction, and destruction of soil structure, which can subsequently cause erosion. Studies have shown that trampling disturbance of soils and BSCs is common in areas of livestock grazing and that BSCs are highly sensitive to trampling disturbance (Rodriguez-Caballero et al. 2018). Trampling disturbance can destroy the structure of BSCs and reduce their important ecological functions such as carbon storage and exchange, water infiltration, and nutrient cycling and can lead to an overall decrease in BSC cover (Bowker et al. 2013; Wang et al. 2009). So again, the BLM admits that continued livestock grazing fails to comply with its mandate to protect and restore objects, yet it moves ahead regardless.	GRAZ01-General	The Goals and Objectives of the Livestock Grazing section in Chapter 2 and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. See the Soil Resources section in Chapter 3 and Appendix N for a discussion of impacts to soils from livestock grazing.
14767-199	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	While the BLM fails to provide what criteria were used for determining available/unavailable (an obvious violation of NEPA), in FOIA we received records of the range con calling permittees and asking them if there are areas in their allotments that they do not graze. In the case of Alt D, while the EIS does not disclose this fact, the additional 224,194 acres made unavailable under this alternative, are areas within current allotment boundaries that are physically inaccessible to livestock grazing, have not been grazed and can not be grazed. So the assertions that this protects resources over current management is disingenuous and misleading.	GRAZ01-General	BLM Land Use Plan Handbook H1601-states: "Land Use Plan Decisions. Identify lands available or not available for livestock grazing (see 43 CFR 4130.2(a)), considering the following factors: 1. Other uses for the land; 2. terrain characteristics; 3. soil, vegetation, and watershed characteristics; 4. the presence of undesirable vegetation, including significant invasive weed infestations; and 5. the presence of other resources that may require special management or protection, such as special status species, special recreation management areas (SRMAs), or ACECs. Livestock would be restricted from these areas based upon topography (e.g., cliff lines) and/or fences. Site specific barriers (e.g., fences) would be done at the implementation level decision, yet these areas essentially have current barriers or fences that can already exclude livestock at the time the Record of Decision is issued. It would not require areas being made unavailable in adjacent areas because existing barriers were used to form the boundaries. The Proposed Plan includes acres unavailable to grazing and limited to trailing only that are currently grazed.
14767-2	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Planning criteria miss the fundamental issue what are the impacts of discretionary uses on protected values and purposes. The critical questions that must be answered are 1) is current livestock grazing fully compatible with the protection and recovery of all protected values and resources 2) if not, based on the science and data, what level of livestock use would be 3) what plan components are necessary to achieve full compatibility. For purposes of protecting and restoring the objects identified above and in Proclamation 9558, the Secretaries shall jointly prepare and maintain a new management plan for the entire monument and shall promulgate such regulations for its management as they deem appropriate. Emphasis added. Proclamation 10285 of October 8, 2021 Protect: a: to cover or shield from exposure, injury, damage, or destruction : guard b : defend sense 1c protect the goal Restore: 1 : give back, return 2 : to put or bring back into existence or use 3 : to bring back to or put back into a former or original state : renew The Antiquities Act, the Omnibus Public Lands Act and the agency's NLCS directives mandate that the RMP protect and restore the objects identified in the two proclamations. The EIS fails to even enumerate the objects that they are mandated to not only protect but restore. The EIS is filled with bald assertions that the DRMP will protect (rarely is restore even mentioned) objects, but this falls flat because the BLM neither provides an enumeration of the objects nor any rational support for the assertions provided. Within these definitions and within the mandates of the Omnibus Public Lands Act and the agency's NLCS directives the BLM is not permitted to either maintain the status quo for damaging discretionary uses or simply damage, degrade and destroy identified objects slightly less than they are being damaged, degraded and destroyed now.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Proclamation 9558 and 10285 contain the objects for which BENM was established.
14767-20	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The AMS and EIS fail to provide long term actual use data, which is critical to understanding current conditions. Planning Criteria are defined in regulation 43 CFR 1610.4-2: (b) Planning criteria will generally be based upon applicable law, Director and State Director guidance, the results of public participation, and coordination with any cooperating agencies and other Federal agencies, State and local governments, and federally recognized Indian tribes. Manual 1601 further defines Planning Criteria as: Planning Criteria: the standards, rules, and other factors developed by managers and interdisciplinary teams for their use in forming judgments about decision making, analysis, and data collection during planning. Planning criteria streamline and simplify the resource management planning actions. The AMS has not expressed what exactly the criteria are but we assume they are the questions posed in Section 5. If so these are often way too general and unquantifiable to be useful as planning criteria. Also they are often not based on the factors listed in the planning regulations and Manual 1601. The EIS and RMP reflect this same failure of required specificity.	GRAZ01-General	See Chapter 3 of the RMP/EIS for data used to analyze the impacts of proposed management on the resources contained in the Monument.

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14767-41	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	It is imperative that BLM, in its RMP, recognize the value of ungrazed watersheds both from an economic and environmental point of view. Not all areas should be grazed by livestock. This should be based on a determination of suitability for livestock grazing considering alternative uses and their benefits as well as the current condition of the land. In addition, sensitive soils and biological soil crusts must be protected. This includes soils which occur on steep slopes, are susceptible to severe wind and water erosion or have been degraded from their potential by removal of ground covering vegetation and cryptogammic crusts. It also means that in areas of weed infestations, generally caused as a result of livestock grazing, livestock should be eliminated to allow recovery. Unsuitable areas should be mapped and allotments in those areas phased out to provide necessary protections. Those areas that are to continue being grazed by livestock must be stocked and managed in accordance with the condition of the land and its vegetation.	GRAZ01-General	The Proposed Plan includes 156,997 acres that would be unavailable/not suitable to livestock grazing. As outlined in the Management Actions by Alternative in the Livestock Grazing section, livestock grazing will be implemented to meet the standards for rangeland health in a manner that is consistent with the protection of BENM objects, which include soils, BSC and invasive species as an indicator. In addition, if monitoring indicates that domestic livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan also requires allotment management plans and other step down implementation plans to address a variety of topics. The allotment management plans would consider BSCs.
14767-42	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In areas to be grazed by livestock, the amount of forage produced must be determined and allocations of forage to watershed protection (50%), wildlife (25%) and livestock (25%) be made as recommended by Holechek et al (1998)2. Field data collection will be necessary to accomplish this. Unfortunately, the Holechek text is based on livestock production not protection of Monument resources and NLCS requirements. The proposed RMP must provide this.	GRAZ01-General	As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines. Utilization levels would take forage needs of wildlife into consideration and are monitored.
15067-1	Anne Haven McDonnell		In this delicate dry environment, we need to track and assess the impacts of grazing and adjust accordingly to protect the health of this desert ecosystem.	GRAZ01-General	The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined in the Goals and Objectives of the Livestock Grazing section in Chapter 2, management can be adjusted as necessary to meet these objectives for rangeland health. The RMP/EIS includes BMPs and guidance for monitoring.
15103-1	Kristen Temple		It's a wonderful place to hike except when I am suddenly accosted by the stench of cow patties. This is especially offensive after rains and near streams. Cattle should never be near streams – the damage they do is significant. Also, it's a bad experience to sit down for a snack only to be annoyed by all the flies drawn to the cow patties.	GRAZ01-General	The Proposed Plan in the Livestock Grazing and Water Resources sections include management actions for the protection of water resources.
15381-5	Sagebrush Habitat Conservation Fund		2.4.22. Livestock Grazing 2.4.22.1. GOALS AND OBJECTIVES. We admire your goals and objectives; however, they seem to have been brought forward from previous documents. So how is that going? We note that less than half of the planning area has been evaluated for Standards of Rangeland Health. Not knowing the status of rangeland health seems to be huge data gap that will prevent accomplishment of goals. Conducting full, interdisciplinary evaluation of Rangeland Health and PFCs for all riparian/wetland areas should be a priority management action. It is concerning that there are no management actions that directly tie to the goals to be achieved. 2.4.22.2. MANAGEMENT ACTIONS COMMON TO ALL ALTERNATIVES. Most of these action items are either aspirational, matters of law, or vague and non-specific.	GRAZ01-General	The Proposed Plan in the Livestock Grazing section and the Water Resources section include management actions for the protection of water resources. In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within 3 years of the signing of the ROD, 6 allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The BLM also has a schedule developed outside of this planning effort for the completion of Rangeland Health (of which PFC is a part of) of the rest of the allotments within or partially within BENM. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewals will be guided by current land health evaluations. Under the Proposed Plan, if monitoring determines that a permitted activity is a causal factor in deteriorated riparian or riverscape health, steps would be taken to mitigate the impacts of that activity or temporarily restrict the activity.
15546-1	Michele Ivins Halls 479 E Eagleridge Dr North Salt Lake, UT 84054		My family members have personally witnessed the intrusion of a nonnative, invasive weed onto their grazing permits since the creation of the Bears Ears Monument. How is this goal going to be achieved and enforced with so many more people coming to the area? The grazing of domestic livestock does not enhance the intrusion of nonnative plants, but the addition of more vehicle and foot traffic certainly does.	GRAZ01-General	The RMP/EIS acknowledges the impacts of recreation (including OHV use), wildfire, Lands and Realty actions, positive vegetation management actions, and livestock grazing on the spread of invasive plants. The RMP EIS does not rule out that livestock grazing is a cause of invasive plants spreading within BENM. Impacts of livestock grazing on vegetation and invasive plants is discussed the Terrestrial Habitat and Vegetation Resilience and Conservation section and the Noxious Weeds and Nonnative Invasive Plants section of the RMP/EIS. As outlined in the Livestock Grazing section of Chapter 2, grazing will be implemented to meet the standards for rangeland health in a manner that is consistent with the protection of BENM objects, which include invasive species as an indicator. While the Proposed Plan does not contain management actions specific to recreation and the spread of weeds, the agencies do regularly monitor and treat noxious weed populations including at trailhead and campgrounds and other areas of high recreation concentration such as along the San Juan River.
15761-5			Use virtual fencing to keep cows out of culturally sensitive sites, water resources, disturbed areas and wildlife sensitive areas. The forest service even wrote an article about how this is effective on New Mexico ranches. I attended a zoom workshop of virtual fencing with ranchers across the west and it is so much cheaper the ranchers were interested. This new technology is a game changer and needs to be seriously considered.	GRAZ01-General	This is an implementation level consideration and a tool of grazing management that could still be allowed under the Proposed Plan.
15761-8			Please define sustainable livestock grazing procedures.	GRAZ01-General	The agencies manage grazing to maintain rangeland health standards. USDA Forest Service policy for rangeland health is addressed in Forest Service Manual 2200 Rangeland Management and in Forest Service Grazing Permit Administration Handbook FSH 2209.13, Chapter 90 Rangeland Management Decision Making. BLM policy for rangeland health is addressed in H-4180-1 Rangeland Health Standards Handbook.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15780-2	Michael Bielawski 800 Coulter Street Fort Collins, 80524		I noticed the economic impact statement for grazing did not account for the negative impact on the federal budget. AUMs generally cost more to administer than the permit fee.	GRAZ01-General	The AUM cost is set through a formula used for calculating the grazing fee was established by Congress in the 1978 Public Rangelands Improvement Act and has remained in use under a 1986 presidential Executive Order. This is not something the agencies can modify in this plan.
1675-2	Mary Holm		Cattle grazing should be eliminated n public lands. It is damaging wild plants to extinction!	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing section and the Vegetation section include management actions for the protection of vegetation resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Terrestrial Habitat and Vegetation Resilience and Conservation section disclosed impacts of livestock grazing to vegetation resources.
17573-50	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	In short, the BLM plays an oversized role in ensuring the continued success of livestock grazing in Utah. However, the State is concerned given the fact that in Utah, grazing has declined on BLM lands by more than 66 percent ³¹ over the past century. While maintaining livestock numbers and Animal Unit Months (AUMs) at a level consistent with the ranges carrying capacity is a worthy goal, experience shows that temporary reductions in AUMs have a way of becoming permanent reductions. As such, the State has adopted a no-net-loss policy regarding livestock AUMs on federal grazing allotments. ³² Here, No Net Loss in the SRMP means, AUMs within the state remain at or above current levels unless a scientific need for temporary reduction is demonstrated to the satisfaction of state officials in the case that AUMs are temporarily reduced, these reductions are reinstated at the earliest possible moment once vegetative health has been restored to its previous levels. ³³ While it is certainly necessary to temporarily reduce AUMs in certain situations, such as during extreme drought, temporary reductions mustn't become permanent (such as through permit retirement). As such, the State does not support the permanent retirement of any grazing allotment ³⁴ and the state opposes the relinquishment or retirement of grazing animal unit months in favor of conservation, wildlife, and other uses. ³⁵	GRAZ01-General	The Proposed Plan does not alter currently allocated AUMs as outlined in Chapter 2 Livestock Grazing. Any reductions that are determined to be necessary due to the reduction of acres available to grazing would be done at the implementation planning level, after a grazing permit or lease is voluntarily relinquished. The retirement of lands subject to a voluntarily relinquished livestock grazing permit or lease is required by Presidential Proclamation 10285.
17573-55	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State is in no way suggesting that the BLM/USFS adopt specific AUM numbers for the BENM. The analysis contained herein is provided only to show that using publicly available remote sensing rangeland analysis tools, the impacts on these grazing allotments could be significant depending on the details of each specific allotment plan. Further, the State of Utah has adopted a no-net-loss of AUMs policy which dictates that [g]razing allotment animal-unit months (AUMs) within the state should remain at or above current levels unless a scientific need for temporary reduction is demonstrated to the satisfaction of State of Utah officials. ⁴⁸ The BLM and the USFS have not demonstrated a scientific need for either temporary or permanent reductions in AUMs on the BENM. As has been said previously in this letter, as well as in past comment letters incorporated herein, grazing is such a complex and important key to this planning process that it deserves a separate grazing plan.	GRAZ01-General	The Proposed Plan would not alter currently allocated AUMs as outlined in the Management Actions by Alternative in the Livestock Grazing section. Modifications to AUMs would be done at the site-specific implementation level planning process, consistent with Federal law, regulation and policy using the best available science, and after the permit or lease is voluntarily relinquished. Under the Proposed Plan, the agencies would develop and implement Allotment Management Plans in order to further manage livestock grazing.
17573-62	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Concerning misinformation, consider the BENM Plan Fact Sheet released on March 8, 2024. ⁵³ Anyone who has not carefully read Proclamation 10285 may be tempted to believe that the traditional cultural practice of livestock grazing is a historic object protected by the monument because the proclamation notes other important uses in the area, including grazing . Additionally, at a public meeting held at the Blanding City Office on May 9, 2024, District Ranger Michael Engelhart responded to a question about the historical importance of grazing by stating that the proclamation refers to historical grazing several times. Again, this statement may have led some people to believe that the monument designation protects this important historical practice. However, what the Fact Sheet and Ranger Engleharts response fail to mention is that historic grazing is explicitly excluded from monument protections. Both the proclamation itself and the Agencies interpretation of the proclamation create confusion and inconsistency regarding grazing protections.	GRAZ01-General	While livestock grazing is a use noted in Proclamation 10285 and Proclamation 9558, livestock grazing is not an object of historic and scientific interest designated for protection. However, the Proclamation does identify certain objects associated with grazing that are protected by the Proposed Plan, such as historic signatures.
17601-8	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	LIVESTOCK GRAZING Livestock grazing has existed on the BENM landscape for more than a century and is a vital economic driver for San Juan County. Livestock grazing is also the main revenue-generating economic activity on trust lands inheld within BENM. Grazing management actions on surrounding federal lands such as closures, trailing restrictions, use limitations, access restrictions, and the permanent relinquishments of federal permits will all negatively affect the ability of TLA to generate revenues from livestock grazing on state trust lands. The prohibition of livestock trailing along riparian areas, primarily consisting of canyon bottoms, will effectively cut off several parcels of trust lands from grazing access, thus depriving TLA from its main revenue-generating activity on these lands. Specifically, livestock trailing access in the following areas must be maintained to provide access for ongoing economic activities on trust lands. Harts Draw must continue to have livestock trailing rights for permitted grazing access to trust lands located in T30S, R22E, Sec. 16 and T31S, R22E, Sec. 2. Arch Canyon must continue to have livestock trailing rights for permitted grazing access to trust lands located in T37S, R20E, Sec. 16. Fish Creek must continue to have livestock trailing rights for permitted grazing access to trust lands located in T38S, R19E, Sec. 36; T38S, R20E, Sec. 32; and T39S, R20E, Sec. 16. Road Canyon must continue to have livestock trailing rights for permitted grazing access to trust lands located in T39S, R20E, Sec. 32. Moqui Canyon must continue	GRAZ01-General	See the Proposed Plan for livestock grazing in Chapter 2 for areas unavailable/not suitable for livestock grazing and areas limited to trailing. See changes in the Proposed Plan under the Water Resources section. The language around discretionary actions in riparian areas has been adjusted to account for livestock grazing as a continued use. . Potential impacts of the Proposed Plan's livestock grazing allocations on other resources and inholdings are discussed throughout Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			to have livestock trailing rights for permitted grazing access to trust lands located in T38S, R13E, Sec. 16. TLA is concerned that any positive effects to the landscape resulting from livestock grazing appear to have been given little to no thought or analysis in the RMP/EIS process. Livestock grazing, when properly managed, can improve soil health and reduce fuel loads by mimicking the benefits of historic fire regimes that cleared old vegetation to enhance the growth of grasses and forbs. Grazing activity can stimulate biotic activity by facilitating the circulation of oxygen, carbon dioxide, and other gases, by providing nutrients, allowing the penetration of water, and providing land cover to minimize or eliminate bare ground. Water developments associated with livestock grazing also provide critical water sources for wildlife in harsh desert environments. These positive effects of livestock grazing should not be ignored and must be incorporated into the overall RMP/EIS analysis.		
1792-3	Ann Wain		Setting utilization levels for livestock grazing at 30% in the first instance.	GRAZ01-General	As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
17969-7	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Livestock Grazing Grazing is identified as an important use in Presidential Proclamation 10285, as historically, lands now within BENM have been used by Indigenous and local communities to graze livestock. A continued sustainable, pastoral relationship to this landscape remains of high importance to local and Tribal communities connection to place and food security. TNC is a grazing allotment permittee to over 300,000+ acres of BLM and USFS managed land. TNC supports many elements of Alternative E because they would conserve the objects and resources of historic and scientific interest that BENM was designated to protect, such as using indicators of rangeland health for monitoring. To further the viability of grazing as well as rangeland health, TNC recommends that the Proposed RMP/Final EIS allow for adaptive outcome based grazing practices in consultation with the BEC that acknowledge and manage for the impacts of climate change and changing land use.	GRAZ01-General	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section allows for management adaptation and for adaptation to a changing climate and land uses, in cooperation with the BEC. Yet Outcome Based Grazing is beyond the scope of this document.
18082-37	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	On page 3-128 it states, Overall, it is anticipated that livestock would continue to have a neutral effect on the terrestrial vegetation condition with potential for site-specific impacts that can be effectively addressed individually as needed by land managers and through additional actions under Alternative E. However, on page 3-345 it states, Within BLM allotments that overlap with BENM, there are 22 allotments in Category I, 1 allotment in Category M, and 0 in Category C (see Table 3-140). It then explains that Category I means allotments where current livestock grazing management or level of use on public land is, or is expected to be, a significant causal factor in the non-achievement of land health standards [LHS], or where a change in mandatory terms and conditions in the grazing authorization is or may be necessary. It appears that according to this information, livestock grazing is not having a neutral effect on the landscape. We recommend the Final EIS address this apparent conflict in information.	GRAZ01-General	The analysis in Chapter 3 has been updated. An allotment being categorized as "I" does not automatically indicate that it is degraded. The criteria used for the placement of the allotments into the category are based on resource potential, resource use conflict, or controversy, opportunity for positive economic return on public investments, and the present management situation. In each category, all items may apply to the allotment or there may be only one specific item that causes the allotment to be placed into the specific category. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan includes prioritizing six allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.
18113-2	Jerry DiMarco Bozeman, MT		What is the condition of the rangelands that have been grazed? Are you current on rangeland assessments? Will rangelands that do not meet Land Health Standards be restored before grazing is allowed to continue?	GRAZ01-General	The condition of the allotments are discussed in Appendix N, in the Travel, Transportation, and Access Management section. In the Proposed Plan, the BLM is prioritizing seven allotments for Land Health Assessments. The agencies are continually assessing allotments as part of annual rangeland management. Agencies have monitoring plans outlining schedules for assessment. These Land Health Assessments and continued monitoring would be done in collaboration with the BEC. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached.
1826-7	George and Frances Alderson 112 Hilton Ave. Catonsville, MD 21228		Cattle management: We urge BLM and FS to reduce the impacts of cattle in BENM, especially in riparian habitat and in areas of greatest recreational use. Cattle should be excluded securely from springs, riparian areas, and perennial streams. No new livestock waters should be allowed. Where sensitive areas were voluntarily retired from grazing, those areas should again be closed to cattle.	GRAZ01-General	The Proposed Plan includes management for the protection of water sources in the Livestock Grazing and Water Resources sections and addresses recreation use and livestock in the Recreation and Visitor Services section. In the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan new water developments or modifications to existing water developments would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years. The process of relinquishment of grazing permits is included in the Proposed Plan as provided for in Proclamation 10285. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
18612-2	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	The acreage proposed for withdrawal in the preferred alternative is just 28,054 acres. This is a minimal amount in the context of the total available acres in the monument (estimated at 1, 216,842). In addition, many of the areas proposed for withdrawal are already not grazed, so this is not a true livestock reduction on the ground. This is not appropriate for a national monument, where grazing is a discretionary use that has caused damage to monument objects. It can only take place as long as it is consistent with the care and management of the objects identified in Proclamations 10285 and 9558. The impacts of current grazing are evident (see discussion on pages 3-6 below), which indicates that monument objects are currently not being protected in a number of pastures.	GRAZ01-General	The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing or limited to trailing. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18612-4	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	NEPA requires development of a range of alternatives. As Table 1 above shows, there is little difference between the no action alternative and Alternatives B, C, and E. Alt D is the only option with a significant difference that meets that NEPA regulation.	GRAZ01-General	NEPA does not require the consideration of every conceivable alternative. Instead, the range of alternatives considered is determined by the purpose and need for action. Reasonable alternatives to the proposed action should fulfill the purpose and need and address unresolved conflicts related to the proposed action as per CEQ NEPA implementing regulations at 40 CFR 1500.2 and 40 CFR 1501.2(c). The range of alternatives for livestock grazing, as summarized in the Comparison Summary of Alternatives table in the PRMP/FEIS, fulfill the purpose and need for the BENM PRMP and address the issues raised. The Comparison Summary of Alternatives table identifies differences between the Alternative A available/suitable acres at 1,223,820 acres and the Proposed Plan available/suitable acres at 1,189,648 acres. Alternatives B, C, and E available/suitable acreage differs from Alternative A suitable/available by 29,291 acres and Alternative D suitable/available differs from Alternative A by 270,129 acres. Under the Proposed Plan, BENM would be available/suitable for livestock grazing except for 174,411 acres, which would be unavailable/not suitable or restricted to trailing only. The Proposed Plan was developed from Alternative E based on the consideration of public comments on the Draft RMP/EIS, input from cooperating agencies, Tribal Nations, and the BLM and USDA Forest Service interdisciplinary team, government-to-government consultation, updates to the best available science, and by combining elements of the alternatives analyzed in the Draft RMP/EIS.
18680-4	Ken Fitch		Livestock grazing Designation of appropriate areas would provide some clarity, although the emerging issue will become the effects of climate change and continuing sustainability of some areas. On one of the charts in the voluminous collection in the plan, there is mention of stock trails, including in some areas of major significance with cultural sites or unique vegetation about which there is concern about stock trail waste and seed dispersal of invasive species not native to the particular area, This is an issue that needs to be monitored and managed.	GRAZ01-General	See existing livestock grazing maps in the RMP/EIS. Additionally, a map of allotments overlaid with areas closed to grazing will be added to the RMP/EIS. The Proposed Plan in the Livestock Grazing, Vegetation, and Cultural Resources sections include management actions for the protection of vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3.
18982-1	Daniel Kent 399 E 100N Moab, 84532	Friend of the Abajos	In evaluating and managing for the eventual elimination of cattle grazing in the park, the extensive work and assessments of Jimmie Forrest and others should be incorporated and preserved by management. The Forest was well managed for many years, the BLM not so much, tho a lawsuit at least forced the ending of grazing in the canyons of Cedar Mesa. For the same reasons raised by this successful lawsuit, grazing should be phased out across the entire monument. Keeping 85% of the monument open to grazing, as allowed in alternative E, is unconscionable and inconsistent with management for preservation of cultural and biological values. Staff should take note of the amazing recovery of native plants and other features on the rested Ute allotments on Elk Ridge and continue to document conditions and facilitate continued resting. Eventually all of Elk Ridge should return to this sort of livestock-free condition!	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely.
1900-1	Dennis Hochwender 452 Bismarck Street Grand Junction, CO 81504		Reading the plan is very confusing because you constantly talk about protection of archeology sites, improvement of water, air, native plants and soil and yet you refuse to limit the cattle as much as you choose to limit people. Ive been visiting and volunteering in the BENM area for 40 years. In that time I have seen many sites destroyed by cattle grazing. The crust where they graze is decimated, the water is fouled in that area and downstream for miles. The sound quality changes from bird sounds to bawling calves. The native plants are trampled and invasive weeds are taking over. And yet, your monitoring data and remote sensing data did not suggest that grazing was incompatible with protecting Monument objects in all areas of BENM, making it unlikely the BLM would be able to justify limiting grazing. Currently cattle graze all of Butler Wash, and wander as far up canyon as they want, often trampling pot Sherds, rubbing on wall of ancient dwellings and making the human visitors wonder why they are supposed to avoid walking on biocrust. The only site in Butler Wash that is safe from cattle is LongFingers and we have to fix the fence built by Friends of Cedar Mesa on a regular basis because cattle break the pipe fence. So little is left and that will soon be trampled by cattle if something is not done. The Wilderness study areas are open to cattle grazing and ranchers set up large cowboy camps where they house their horses, random cattle, fencing and their four wheelers.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Water Resources, Vegetation, and Cultural Resources sections include management actions for the protection of water resources, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. The nine side canyons of Butler Wash are already unavailable to grazing. Line camps are an approved range improvement for livestock grazing management. Existing range improvements would be maintained if consistent with protecting BENM objectives. Under the Proposed Plan new range improvements and modifications to existing improvements for livestock grazing purposes, are prohibited unless: The primary purpose is to protect or enhance BENM objects; and BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
1906-11	Morgan Sjogren		Areas where Tribal cultural sites, including springs and traditional plants, should be considered for grazing closures.	GRAZ01-General	The Proposed Plan in the Livestock Grazing, Water Resources, Vegetation, and Cultural Resources sections include management actions for the protection of water resources, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Further restrictions can be implemented at the implementation planning level when grazing permits undergo NEPA analysis.
2146-3	James Thompson		It's easy to understand that domestic livestock grazing has caused significant damage (and continues) to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan should require the agencies to immediately begin compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs.	GRAZ01-General	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the Management Actions by Alternative in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
30-1	Appalled by BLM's harmful grazing bias		BLM's preferred alternative for BENM is anemic, deficient, and demonstrates BLM's ongoing cowardice when it comes to managing grazing. And even the most restrictive DEIS alternative is inadequate in its relatively modest grazing changes. In light of the science, and the patent threat that ongoing grazing poses in BENM, I cannot support any alternative. None of the alternatives address grazing at the required spatial and temporal scale.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely.
30-2	Appalled by BLM's harmful grazing bias		When it comes to grazing in BENM, BLM needs to "go back to the drawing board" to revise the BENM DEIS or provide in the BENM FEIS an honest action alternative that would eliminate or at least greatly reduce future BENM grazing. BLM should also actively seek the acquisition or donation of BENM grazing permits so that those allotments could be permanently retired under the new BENM Plan.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely.
3148-2	Christina Bauer 1016 Boylan Road Bozeman, MT 59771		However, I have seen the manure clogged creeks and desert flats choked by tumbleweed within Bears Ears Monument. Cows destroy such a fragile ecosystem. Please eliminate or greatly reduce grazing.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3.
642-3	BLM should not be cowed by ranchers		Grazing and associated roads, range "improvements", water wells, pipelines, and other developments are collectively the most widespread and cumulatively serious threat to the protection of monument objects. While managing increasing public recreation is also important, grazing is the most pernicious land use on the monument landscape. Although grazing is considered an "allowable use" in the monument, BLM can and should limit or remove grazing when monument objects are or may be adversely impacted. Object protection legally is the highest monument management priority and grazing is subservient to that priority.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Under the Proposed Plan more acres are made unavailable to grazing or limited to trailing only than is currently authorized. The Proposed Plan, as described in the Management Actions by Alternative in the Livestock Grazing section, would prohibit new range improvements and modifications to existing range improvements unless: The primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed. Existing range improvements for livestock grazing purposes would be maintained in the same manner and degree as authorized, if consistent with protecting BENM objects.
707-1			None of the DEIS alternatives would prevent livestock grazing from adversely impacting monument objects. Alternative D would have the greatest grazing reduction, but the vast majority of the monument would remain open for grazing. Grazing may be an allowable use but it is not a required use, especially when objects are threatened.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
719-2	Sarah Graham		Livestock grazing has consistently been shown to be ecologically damaging. It has been linked in the scientific literature to soil erosion, water pollution, riparian degradation, biodiversity loss, and overall ecosystem function degradation (Filazzola et al, 2020; Fleischner, 1994). In taking this information into account while evaluating the ambitious RMP/EIS goals to protect BENM soil resources, ecological stability, stream function and morphology, desired vegetation, and critical habitat, it is apparent to me that the livestock grazing restrictions outlined in the document are lacking sufficient muscle.	GRAZ01-General	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, and Vegetation sections include management actions for the protection of water resources, soils and vegetation. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
719-3	Sarah Graham		Language should be added to the RMP/EIS stating that a National Environmental Policy Act (NEPA) review and a Land Health Standards review (for Bureau of Land Management [BLM] allotments) are required prior to grazing permit renewal. This process was historically mandated by law prior to the passing of Federal Land Policy and Management Act Amended Section 402(c)(2) in 2014, which allowed for permit renewal in advance of these critical environmental reviews to address delays from the NEPA backlog at the BLM.	GRAZ01-General	This RMP does not change the way grazing permits are renewed. They will be renewed in accordance with the current protocol and process. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
719-4	Sarah Graham		The ecological goals of the RMP/EIS, the declarations in Proclamation 10285 of the cultural and ecological significance of BENMs plants, wildlife, and ecosystems, and the rapid pace of degradation possible in BENM riparian areas from cattle congregation all suggest that the Section 402(c)(2) loophole should not be an option for Bears Ears allotments.	GRAZ01-General	This RMP does not change the way grazing permits are renewed. They will be renewed in accordance with the current protocol and process. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals in collaboration with the BEC.
719-6	Sarah Graham		As of October 2022, 19 of the 20 grazing allotments overlapping BENM were classified with an Improve management category (U.S. Department of the Interior, 2022). This indicates that these ecosystems have already experienced degradation which is likely to worsen barring protections. If the RMP/EIS fails to incorporate rules for grazing that are on par with those indicated for other land use practices in the monument, outcomes for BENMs natural landscapes will likely fall short of the Presidents goals in designating the monument as well as the overarching ecosystem objectives stated in the RMP/EIS.	GRAZ01-General	An allotment being categorized as "I" does not automatically indicate that it is degraded. The criteria used for the placement of the allotments into the category are based on resource potential, resource use conflict, or controversy, opportunity for positive economic return on public investments, and the present management situation. In each category, all items may apply to the allotment or there may be only one specific item that causes the allotment to be placed into the specific category. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
7711-1	Ryan Leonard		Resource extraction like mining, and cattle grazing should not be permitted. Grazing is not viable option, it destroys biodiversity, competes with wildlife and is unsustainable for this area. Biological soil crusts perform important ecological roles including carbon fixation, nitrogen fixation and soil stabilization. Cattle grazing destroys these soils and is counter to what the BLM teaches for this area.	GRAZ01-General	Subject to valid existing rights, BLM and NFS lands within BENM are withdrawn from location, entry, selection, or patent under the Mining Law of 1872 and from disposition under all laws relating to mineral and geothermal leasing. The agencies, in collaboration with the BEC, would, to the greatest extent possible, and in accordance with applicable law, manage any operations that occur under Mining Law or the mineral leasing laws pursuant to valid existing rights in a manner that protects and mitigates impacts to the protection of BENM objects. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in Livestock Grazing, Soil Resources and Wildlife and Fisheries sections include management actions for the protection soils and wildlife. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
7711-2	Ryan Leonard		This plan needs to address and have justifiable criteria for its fees or lack thereof and have justifiable criteria leaving them below current fair market value. An AUM is NOT justified in 2024, and is one of the reasons for so much deferred maintenance. I believe this is important because the review should provide a cost benefit to each management activity: horses, skiing, grazing, hunting, hiking, Mnt biking etc) and financially show their true impacts to our public lands (damage, rehabilitation, management process). Areas that should be reviewed: Legacy users and super utilizers (grazer- a true cost of damage from road maintenance, habitat damage, trail damage, nonnative vegetation species spreads and remove), permittees, and legacy fees. Funding needs to be realistic to meet the first objective of addressing backlog maintenance. An example, My family goes camping for 2 nights. Ill spend ~\$40 + for 3 days of recreation while a cow and calf is a fraction of that amount and causing exponentially more resources damage and negatively impacting wildlife as well. They should be paying their fair share. This plan needs to address this inequity.	GRAZ01-General	Potential economic impacts of the Proposed Plan are discussed in the Environmental Justice and Social and Economic Values section. Livestock grazing fees are not set by planning processes. The impacts of livestock grazing on resources are discussed throughout Chapter 3. The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined in the Livestock Grazing section of Chapter 2. Livestock management can be adjusted as necessary to meet these objectives for rangeland health.
8014-2	Joseph LaCavera		Improper grazing continues to cause significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The agencies should immediately begin compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock.	GRAZ01-General	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, the agencies would: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
8784-1	Bill Baker		I mostly want to express my concern that there will likely be continued degradation of most of the Monument area by domestic livestock grazing, which reduces native plant cover, destroys the cryptogamic crust, and increases invasive non-native plants. I strongly suggest removing livestock from 50% of this irreplaceable landscape and limiting livestock use on the other 50% to just upland areas. Please no livestock grazing allowed in any canyon or on any canyon slopes, only on uplands and only away from water. The Colorado Plateau is not a place where sustainable livestock production is possible—it is too dry, too delicate (cryptogamic crust), and too vulnerable to invasive plants. Please analyze this as an alternative in the next version of this plan and adopt it as the most sensible compromise for this delicate set of ecosystems.	GRAZ01-General	The Livestock Grazing, Soil Resources, Water Resources, and Vegetation sections include management actions to protect vegetation, soil and water resources. The Proposed Plan includes additional acres on BLM made unavailable to grazing or limited to trailing only than is currently grazed. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.

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994-1	Angela Marian		Grazing Restrictions: Monument status often brings new regulations that can restrict grazing areas or the number of livestock allowed. These restrictions can reduce the carrying capacity of the land for livestock, directly impacting ranchers and their income.	GRAZ01-General	The Proposed Plan does not alter currently allocated AUMs as outlined in Chapter 2 Livestock Grazing. Any reductions that are determined to be necessary due to the reduction of acres available to grazing would be done at the implementation planning level. The impacts of the Proposed Plan to livestock grazing and permittees is disclosed in the Livestock Grazing section Chapter 3 where it is recognized that restrictions could have an impact on permittees.
997-1	Angela Marian		The Lack of Consideration: In this plan the AUM (Animal Units Month) in total may have been calculated, however the individual economic loss for each and every individual rancher was not calculated. In the Nepa law one requirement is addressing each project, taking into account all consequences. By not doing so this is illegal.	GRAZ01-General	Potential economic impacts of the Proposed Plan are discussed in the Environmental Justice and Social and Economic Values section. The agencies conducted a landscape level analysis that covers a large area and a broad range of resources. The economic impacts are discussed at a Planning Area scale appropriate to the scope of this RMP. When considering any future permit renewals for allotments within BENM, the agencies will analyze the economic impacts to the permittee and any other associates of the grazing operation, as appropriate, including if AUMs/available acreage are reduced.
998-1	Angela Marian		Limited Access to Resources: Restrictions on land use can limit ranchers access to essential resources like water and forage. Traditional practices, such as moving livestock between grazing areas seasonally, may be disrupted, affecting the health and productivity of their herds.	GRAZ01-General	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Any restrictions on grazing activities are done to protect BENM objects to align with Proclamation 10285. Access that is limited to the general public can still be granted to permittees if the permitted access is consistent with protecting BENM objects.
1484-3	Lisa Potter		Please improve Alternative B to ensure livestock management of grazing in the final plan by setting utilization levels at 30% until you determine if a higher level of grazing is still protective of monument objects and values.	GRAZ01-General, ALT02-Alternative B	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
6813-7	Debbie Justice		Alternative D has a better livestock plan. I live close to Gold Butte where the Bundy family has unilaterally decided that they can graze wherever they want without paying a penny. I have seen what this anarchist approach has wrought. We have sadly learned that precious resources are not limitless and need to be managed for the health of our land and cattle. I believe the final Bears Ears Management Plan should include compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs. With careful management, paid for by the cattlemen, we can ensure a good use balance for the area.	GRAZ01-General, ALT04-Alternative D	The Proposed Plan in the Livestock Grazing and Water Resources sections, includes management actions for the protection of water resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
9372-15	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	It is imperative to the entire grazing economy that Alternative D does not get selected. Under alternative D, nearly all winter ranges are highly impacted, and it would collapse the grazing economy and the entire culture behind it in this area.	GRAZ01-General, ALT04-Alternative D	The Proposed Plan incorporates some elements of Alternative D. Impacts on economic conditions from changes in grazing, such as changes in jobs, income, social conditions, and changes in culture and way-of-life, are discussed in Chapter 3.
9287-4	Vaughn Hadenfeldt		Having grown up on farms and ranches I appreciate the local ranching lifestyle but not when raising livestock changes the landscape. The effects of over-grazing, especially during our long-term drought cycles, must be seriously addressed. I have witnessed the devastating impact overgrazing has wrought on the vegetation across the mesas in BENM. Wandering livestock has punishing impact on the archaeology and overall environmental health of the entire BENM.	GRAZ01-General, ALT05-Alternative E	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The potential impacts of the Proposed Plan to vegetation and cultural resources and archeology sites are disclosed in the Terrestrial Habitat and Vegetation Resilience, Cultural Resources, and Archeological Sites sections as well as impacts to other natural resources throughout Chapter 3.
1928-5	Robert Pazik		For livestock grazing, I advocate a standard measure across the Monument to track and assess range health and to align evaluation intervals and forage assessments.	GRAZ01-General, ALT05-Alternative E	In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
10343-2			3. Exclude livestock from perennial surface water, riparian areas, and springs.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan in the Livestock Grazing and Water Resources sections include management actions for the protection of water resources.

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10678-1			The Bears Ears Inter-Tribal Coalition Land Use Plan advises that cattle "be cared for properly so they dont destroy the land." Alternative E should incorporate language requiring range riders to move cattle daily to prevent over-concentration in sensitive areas, particularly springs, and eliminate fences and livestock watering installations where possible. I also support the grazing closures represented in Alternative D.	GRAZ01-General, ALT05-Alternative E	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Routine management of livestock may include the use of "cowboys" or "range riders" to distribute livestock, maintain range improvements, and other duties associated with livestock management. Requiring these specific monitoring approaches is outside the scope of this Plan. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section prohibits new range improvements or modifying range improvements unless the primary purpose is project BENM objects. The Proposed Plan includes additional acres as unavailable to grazing.
10678-2			I am advocating for the adoption of Alternative D's provision to reduce the amount of vegetation used by cattle from 50% to 30%, until scientific evidence shows that a higher percentage can still protect resources.	GRAZ01-General, ALT05-Alternative E	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
10857-1	Shawn Ivins		There is wording in the different Alternatives under the livestock grazing section that is very unclear and ambiguous. For example, in Alternative E, it states that range improvements would be maintained only if they are consistent with the protection of objects. So, I would ask, how is it decided and who gets to decide if they are consistent with protection of objects.	GRAZ01-General, ALT05-Alternative E	See Proposed Plan in the Management Actions Common To All Alternatives in the Livestock Grazing section. Agencies would continue to make decisions in collaboration with the BEC and with grazing permittees regarding range improvements.
11767-2	Steven Kloetzel		Livestock Permits should be assessed going forward on a 2-year basis. The condition of a grazing allotments native plant communities, soil health, erosion, cryptobiotic crusts, weed occurrence, and cultural sites should be thoroughly assessed and evaluated by a team comprised of professional soil scientists, botanists, hydrologists, and Tribal representatives. Allotments with degraded conditions should be phased out within 2 to 5 years.	GRAZ01-General, ALT05-Alternative E	In the Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section, the BLM is prioritizing seven allotments for Land Health Assessments. The agencies are continually assessing allotments as part of annual rangeland management. Agencies have monitoring plans outlining schedules for assessment. These Land Health Assessments and continued monitoring would be done in collaboration with the BEC. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached.
12732-2	Patricia Becnel		I favor limiting grazing and support retiring grazing leases when they expire. Grazing harms the soil and we have seen riparian areas ruined becasue of grazing and damage to the watersheds.	GRAZ01-General, ALT05-Alternative E	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. As outlined in the Goals and Objectives of the Water Resources section agencies will protect and restore water resources, including riparian areas, wetlands, springs, and seeps. The Management Actions Common To All Alternatives in the Water Resources section outlines that riparian and wetland resources would be managed for PFC; manage water resources for quality and quantity. The Soil analysis discusses impacts from livestock grazing in the Soil Resources section.
15055-8	Robin Todd	Maryland Ornithological Society	Riparian vegetation in the canyons provides essential habitat for both resident and migrant birds. Grazing by domestic livestock impairs that value of the monument. Grazing in riparian areas has been studied by range scientists and wildlife biologists over many years. Their findings tell us that livestock congregate along watercourses to seek forage, water and shade, and this results in intense grazing and trampling and the destruction of riparian vegetation. The final plan should provide for reductions in grazing to bring back native ecosystems. Livestock should be excluded strictly from perennial surface waters, riparian habitat areas, and springs.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan in the Livestock Grazing and Water Resources sections include management actions for the protection of water resources and riparian habitat. See the Vegetation section for a discussion of impacts to riparian habitat from livestock grazing.
15116-3	Michele Ivins Halls 479 E Eagleridge Dr North Salt Lake, UT 84054		Alternative E includes the following wording: Prohibit new water source development for domestic livestock unless necessary to protect BENM objects. Existing water developments for livestock or wildlife would be removed unless they protect BENM objects, where feasible. Such wording is inconsistent, irrational, and illogical if the goals are to maintain the health of the land and the resources. Domestic livestock will congregate around water sources, so if water sources are removed or not developed, there will be fewer locations for animals to water. The impact to the soil, plant life, and natural sources of water (springs) will not be protected if water sources are not developed or are removed.	GRAZ01-General, ALT05-Alternative E	See Proposed Plan in the Livestock Grazing section which states water developments would be removed if not consistent with protection BENM objects. The impacts of the prohibition of new range improvements unless the primary purpose is to protect BENM objects is analyzed in the Livestock Grazing section of Chapter 3.
1518-3	Norma Kline		Also, in Alternative E livestock grazing in the final plan should be limited at 30% until science-based information determines a higher level of grazing is still protective of monument objects and values.	GRAZ01-General, ALT05-Alternative E	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.

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15209-3	Carson Halls UT		Alternative E includes the following wording: Prohibit new water source development for domestic livestock unless necessary to protect BENM objects. Existing water developments for livestock or wildlife would be removed unless they protect BENM objects, where feasible. Such wording is inconsistent, irrational, and illogical if the goals are to maintain the health of the land and the resources. Domestic livestock will congregate around water sources, so if water sources are removed or not developed, there will be fewer locations for animals to water. The impact to the soil, plant life, and natural sources of water (springs) will not be protected if water sources are not developed or are removed. Range improvements are always implemented to help support sustainable grazing practices. A rancher would not devote time, effort, and money to a range IMPROVEMENT unless it IMPROVED the area. Hence, saying range improvements will be removed does not make sense (Alternative E).	GRAZO1-General, ALT05-Alternative E	See Proposed Plan at the Management Actions by Alternative in the Livestock Grazing section which states water developments would be removed if not consistent with protection BENM objects. The impacts of the prohibition of new range improvements unless the primary purpose is to protect BENM objects is analyzed in Livestock Grazing section in Chapter 3. If water developments are not found to protect BENM objects, then they will be removed and additional site-specific NEPA would need to occur on NFS lands.
1538-2	Susan Ordway		Please improve Alternative Es management of livestock grazing in the final plan by setting utilization levels at 30% until you determine if a higher level of grazing is still protective of monument objects and values.	GRAZO1-General, ALT05-Alternative E	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis. These utilization levels would be established within two years of the release of this RMP/EIS.
1574-4	Karen Naiman Denver, CO 80247-3020		Improper grazing has caused, and continues to cause, significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan should require the agencies to immediately begin compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs.	GRAZO1-General, ALT05-Alternative E	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, and Cultural Resources sections includes management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and, for BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
15980-3	Payton Halls		Alternative E includes the following wording: Prohibit new water source development for domestic livestock unless necessary to protect BENM objects. Existing water developments for livestock or wildlife would be removed unless they protect BENM objects, where feasible. Such wording is inconsistent, irrational, and illogical if the goals are to maintain the health of the land and the resources. Domestic livestock will congregate around water sources, so if water sources are removed or not developed, there will be fewer locations for animals to water. The impact to the soil, plant life, and natural sources of water (springs) will not be protected if water sources are not developed or are removed. Range improvements are always implemented to help support sustainable grazing practices. A rancher would not devote time, effort, and money to a range IMPROVEMENT unless it IMPROVED the area. Hence, saying range improvements will be removed does not make sense (Alternative E).	GRAZO1-General, ALT05-Alternative E	See Proposed Plan at the Management Actions by Alternative in the Livestock Grazing section which states water developments would be removed if not consistent with protecting BENM objects. The impacts of the prohibition of new range improvements unless the primary purpose is to protect BENM objects is analyzed in the Livestock Grazing section of Chapter 3.
16940-3	Christopher Lish 1004 Los Gamos Road Apt. D San Rafael, 94903		Improper grazing has caused, and continues to cause, significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan should require the agencies to immediately begin compliance monitoring and resource assessments, prohibit new water developments, encourage retirement of grazing allotments, and exclude livestock from perennial surface water, riparian areas, and springs. Alternative E should incorporate language requiring range riders to move cattle daily to prevent over-concentration in sensitive areas, particularly springs, and eliminate fences and livestock watering installations where possible. Please set utilization levels at no more than 30%, at least until land managers determine if a higher level of grazing can still be appropriate to protect monument objects and values. This will help ensure that monument objects and values are better protected from overgrazing.	GRAZO1-General, ALT05-Alternative E	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Under the Proposed Plan, in Chapter 2 it states: Prohibit new range improvements and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and, for BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed. Routine management of livestock may include the use of "cowboys" or "range riders" to distribute livestock, maintain range improvements, and other duties associated with livestock management. Requiring these specific monitoring approaches is outside the scope of this Plan. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines.
17195-2	Terry Camp 9865 State St. Sandy, UT 84070	Utah Farm Bureau Federation	The restrictions on grazing and related infrastructure are frustrating, especially considering that President Bidens Proclamation cites historic grazing as one of the resources of the area. The Proclamation also discusses the long history of grazing by Navajo and Ute families and later Anglo settlers as well as historic cattle-ranching cabins on the landscape. The farming and ranching community in the Bears Ears region is central to the areas identity and sense of community. For generations, families in the BENM region have tended to the lands, nurtured them, and utilized them sustainably to support livestock. The UFBF urges the BLM and USFS to recognize livestock grazing within BENM as a monument object meriting protection. Livestock grazing in this region is not merely a utilitarian activity but a deeply ingrained cultural tradition. As such, grazing deserves the same level of protection and consideration as other cultural and historical artifacts within the BENM boundaries	GRAZ01-General, ALT05-Alternative E	While livestock grazing is a use noted in Proclamation 10285 and Proclamation 9558, historic grazing is not an object of historic and scientific interest designated for protection. However, the Proclamation does identify certain objects associated with grazing that are protected by the Proposed Plan, such as historic signatures. Potential impacts of the Proposed Plan on historic resources are discussed in the Historic Communities, Historical Resources section. The Proposed Plan includes management actions and goals to protect historic properties and sites associated with the historic period.
17357-2	Audrey Glendenning	Great Old Broads for Wilderness	However, Alternative E does not fully address the impacts of grazing on the landscape. Improper grazing causes damage to native plants, water quality, soils, and cultural sites. Grazing suitability decisions should be guided by potential impacts to monument objects. Areas where grazing is inconsistent with proper protection of monument objects should be designated as not suitable for grazing in the final plan.	GRAZ01-General, ALT05-Alternative E	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, and Cultural Resources section includes management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
17357-4	Audrey Glendenning	Great Old Broads for Wilderness	The final plan should also clearly exclude livestock from perennial surface water, riparian areas, and springs.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan in the Water Resources and Livestock Grazing section includes management actions for the protection of water resources. The Proposed Plan prohibits trailing in riparian corridors except where existing livestock corridors occur, and rehabilitates existing corridors where damage is occurring to riparian resources.
17646-2	Martha Ham Leeds, UT 84746		Revise the grazing allotment retirement list to reflect Alternative D, while still conducting compliance monitoring and necessary livestock unit/seasonal adjustments outlined in Alternative E.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan includes some additional acres made unavailable to grazing. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
17807-4	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Ranching What grazing schedules are in place for all livestock, define specifically how all livestock may pose a threat to protection of BENM.	GRAZ01-General, ALT05-Alternative E	Grazing schedules, such as season of use and livestock on/off dates are defined in individual permits and so differ by permit and are done at the implementation level. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan does not make the assertion that "all livestock may pose a threat to protection of BENM".
1810-1	Isaac Lindstrom 287 4th Ave Salt Lake City, UT 84103		Alternative E keeps a concerningly large portion of the National Monument open for grazing. I would prefer a more limited approach to ensure that native wildlife - mule deer, elk, etc get additional feed.	GRAZ01-General, ALT05-Alternative E	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines areas to be made unavailable to grazing and restricted to trailing only.
1814-2			However, Alternative E is deficient on the need to sufficiently reduce livestock grazing to improve resource protection.	GRAZ01-General, ALT05-Alternative E	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines areas to be made unavailable to grazing and restricted to trailing only.
18238-75	Chaitna Sinha		Undertaking range improvements without a land health assessment would mean proceeding without relevant information necessary to inform those improvements. Such an approach is not appropriate in BENM, which should be a model for management best practices and should integrate land health assessments into all relevant aspects of management. We propose that Alternative E be improved with the following management actions adopted from Alternative B (underlined): . Prohibit new range improvements or modifications to existing range improvements, for livestock grazing purposes, unless: . The primary purpose is to protect BENM objects. . They support sustainable grazing practices and reduce impacts to the cultural landscape, including vegetation, wildlife, soil, and other important ecological and cultural resources. . BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed, and, if needed, a causal factor determination has been made for the allotment or applicable watershed. As informed by the land health assessment and causal factor determination, the new/modified range improvements would support the achievement of the BLM Utah Rangeland Health Standards. An exception to this requirement could be approved for new/modifications to range improvements to prevent imminent damage to BENM objects. Existing range improvements would be maintained only if they are consistent with the protection of BENM objects. Existing range improvements that are not consistent with the protection of BENM objects will be removed. [see letter for emphasis]	GRAZ01-General, ALT05-Alternative E	Under the Proposed Plan, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. For BLM, a current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. Under the Proposed Plan, existing range improvements for livestock grazing not consistent with the protection of BENM objects would be removed, modified, or abandoned to be consistent with such protection.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18580-1	Debra Young Moab, UT		I appreciate the opportunity to support option E for its tribal inclusion and land protections, but knowing these lands and having recreated and spent a lot of time in the Bear's Ears region, I don't think the conservation goes far enough. The degradation that grazing causes for the spring and stream beds, the destruction of cultural sites, and the destruction of the soil crust inherent in grazing is not appropriate to these tribal lands for conservation or for the spiritual degradation that grazing causes.	GRAZ01-General, ALT05-Alternative E	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes areas that are available/suitable and unavailable/unsuitable to grazing. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, and vegetation sections include management actions for the protection of soils, water resources and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3.
18686-3	Ed And Gisela Gunderson Los Alamos, NM 87544		We support improving grazing management by requiring resource assessments and livestock monitoring, encouraging retirement of grazing allotments, and by protecting riparian areas, seeps, and springs from grazing impacts.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Included in the Management Actions by Alternative in the Livestock Grazing section is the agencies would prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments, to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.
1906-10	Morgan Sjogren		Alternative E balances livestock grazing with landscape health and protection of cultural resources. To fulfill this a standard and consistent measurement of range health should be monitored across the monument at intervals of no more than 3-5 years.	GRAZ01-General, ALT05-Alternative E	In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within 3 years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
5095-2	Lorna Reed 3553 G Road Palisade, CO 81526		My only change would be to the range management. It is an unnecessary burden to the American taxpayer to subsidize cattle ranching in the desert. The erosion and introduction of invasive species wrought on the land by cows is almost if not completely irreversible.	GRAZ01-General, ALT05-Alternative E	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing and Vegetation sections includes management actions for the protection of vegetation. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Livestock grazing impacts to natural resources are disclosed in Chapter 3.
572-3	Amanda Perkins		The preferred alternative allows grazing in 88% of the 1.36 million acres, this is tragically inadequate for the protection of the ecosystem and preservation of cultural heritage sites which are scattered over 150,000 locations throughout the designated land. The precious and delicate cryptobiotic soil, as well as fragile riparian areas need to be protected from the trampling of cattle. Specified areas may remain for properly rotated cattle who are diligently managed in an environmentally conscious manner.	GRAZ01-General, ALT05-Alternative E	The Livestock Grazing section of the Proposed Plan includes further acres made unavailable to grazing and limited to trailing only. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, and Vegetation sections include management actions for the protection of water resources, soils, and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Livestock grazing impacts to soils, cultural sites, and riparian are disclosed in Chapter 3.
5740-2	Roger Jenkins 588 Evening Star Ln, Bozeman, MT 59715 BOZEMAN, 59715		I was astounded that Alt-E permitted MORE acres open to grazing. My personal experience while hiking in many areas of the Bears Ears is that cattle grazing is a blight on the landscape. In many cases, it seems that cattle and maybe sheep are competing with native wildlife for forage. Also, I have seen evidence in some ground level or near ground level cultural sites that cattle were entering these sites. To me, that seems like a violation of the Antiquities Act, and the best way to stop such is to drastically cut back on those areas where grazing is currently permitted.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Vegetation, Wildlife and Fisheries, and Cultural Resources sections include management actions for the protection of vegetation, wildlife and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Livestock grazing impacts to cultural sites and wildlife is disclosed in Chapter 3.
60-2			I do not believe that Alternative E adequately reduces livestock grazing. Some BENM objects are jeopardized by grazing. Cattle trample soils, disturb cultural sites, and spread cheatgrass. Cattle also compete with wildlife for limited water and forage. Ranchers use primitive routes that could otherwise be closed and reclaimed. Please approve Alternative E with added reductions in livestock grazing.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, Wildlife and Fisheries, and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation, wildlife and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Livestock grazing impacts to soils, cultural sites, wildlife and spread of invasives is disclosed in Chapter 3. Travel management is implementation level planning.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
6813-4	Debbie Justice		Alternative D has a better livestock plan. I believe the final Bears Ears Management Plan should include compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs. With careful management, paid for by the cattlemen, we can ensure a good use balance for the area.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan in the Livestock Grazing and Water Resources sections, include management actions for the protection of water resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. It states in Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in Chapter 2 it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
7958-8			In addition, why is grazing allowed at apparently the same levels in a time of years of drought. Butler Wash remains open to grazing in spite of little forage as evidenced by the extensive cattle trailing throughout the canyon caused by cattle who can't find forage. Along with this problem is the impact cattle are causing to archaeological sites. Cattle are still getting into alcove sites and I have seen extensive disturbance to open sites in Butler Wash. Even one undisturbed prehistorical burial site has been experiencing cattle pooping and sleeping on top of the burial. Bears Ears National Monument is a monument in name only.	GRAZ01-General, ALT05-Alternative E	The Livestock Grazing and Cultural Resources sections includes management actions to protect cultural resources. The Proposed Plan includes additional acres on BLM made unavailable to grazing or limited to trailing only than is currently grazed. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
9061-3			As was done in Grand Staircase National Monument, uneconomic and socially destructive grazing allotments should be retired over time.	GRAZ01-General, ALT05-Alternative E	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Presidential Proclamation 10285 states: "Should grazing permits or leases be voluntarily relinquished by existing holders, the Secretaries shall retire from livestock grazing the lands covered by such permits or leases pursuant to the processes of applicable law." The process for voluntary retirement of grazing permits and leases is described in the Management Actions by Alternative in the Livestock Grazing section.
9127-3	Adam Auerbach		Please also advocate for the grazing closures represented in Alternative D.	GRAZ01-General, ALT05-Alternative E	The Proposed Plan would make fewer acres on BLM-administered lands available to grazing or trailing compared to current management levels.
9188-3	Nike Stevens		I support withdrawals from grazing in Alternative E including Nine side canyons of Butler Wash Developed recreation sites Comb Wash side canyons (Mule Canyon south of SR-95 and Arch, Fish, Owl, and Road Canyons) Arch Canyon, including Texas and Butts Canyons (USFS)Bridger Jack Mesa Lavender Mesa Shay Canyon limited to trailing only (boundary area identified for trailing and is not the Shay Canyon ACEC boundary) Indian Creek from Kelly Ranch vicinity to USFS boundary limited to trailing only Developed recreation sites (existing and as described in Section 2.4.7).	GRAZ01-General, ALT05-Alternative E	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes all the acres unavailable in Alternative E and some additional acres from Alternative D. Many of these areas are already unavailable to grazing under the current RMPs.
9199-3	Linda Stitzer 143 Limestone Rdg SEDONA, AZ 86336		2) Livestock grazing. The impact of livestock grazing in some areas of southern Utah, including parts of BENM is devastating. It is the norm to find the few stream sides trampled and streams polluted with waste. These water sources are scarce and unique. Climate change is impacting water resources as well. While I understand that there is a long history and some local economic benefit of livestock grazing on public lands, these ecosystems are being severely damaged and are not properly managed and protected. While the Proclamation calls for not renewing grazing permits in areas where they have been voluntarily relinquished, it can take many years for any benefits of this approach to be realized and the acreage allowed in Alternative E is large. I support the grazing proposal in Alternative D, which uses a different methodology to fully assess grazing impacts and reduces the amount of acreage that can be grazed.	GRAZ01-General, ALT05-Alternative E	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Livestock Grazing and Water Resources sections includes management actions for the protection of water resources. The Proposed Plan includes some additional acres unavailable to grazing or limited to trailing only that were in Alternative D.
	Howard Cohen		Please improve Alternative Es management of livestock grazing in the final plan by setting utilization levels at 30% until you determine if a higher level of grazing is still protective of monument objects and values, or, preferably, reducing external livestock grazing to zero to preserve the local ecosystem.	GRAZ01-General, ALT05-Alternative E	Under the Proposed Plan livestock grazing would be managed, subject to terms and conditions, in a manner consistent with the protection of Monument objects. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS.
18238-68	Chaitna Sinha		We propose that this area from Alternative D be allocated as not suitable for grazing in the final plan. Dark Canyon is identified as a Monument object, with its hanging gardens, springs, riparian areas, habitat for wildlife, and known populations of Mexican spotted owls specifically highlighted. The Dark Canyon area also contains many culturally significant plant species. Due to the steep walls of Dark Canyon and the lack of significant upland areas adjacent to its riparian areas, cattle grazing is concentrated in the sensitive riparian areas where its effects are intensified. Cattle are damaging the Dark Canyon riparian area, with substantial stream incision and excessive, ongoing erosion being a significant concern. See Appendix A, Dark Canyon Condition Assessment.	GRAZ01-General, ALT05-Alternative E, DATA03-Suggest Additional Data Source	Allotments on NFS and BLM-administered lands will continue to be monitored during implementation planning as part of rangeland health assessments. For NFS lands, a large portion of the Dark Canyon Wilderness is currently closed to grazing including Woodenshoe Canyon and Dark Canyon located down canyon from Rig Canyon. If monitoring indicates livestock grazing is impacting the protection of BENM objects, appropriate changes to livestock grazing management would be implemented to mitigate those impacts in a manner that ensures protection of BENM objects. As summarized in the PRMP/FEIS the Livestock Grazing section in Chapter 3, under all alternatives, the BLM and USDA Forest Service would work with permittees and the BEC to develop and implement grazing management plans for all

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					allotments within BENM. This would occur during the scheduled permit renewal process to ensure management does not compromise Monument objects and to also help improve range conditions.
18238-4	Chaitna Sinha		Considering the pervasive use of livestock grazing across BENM, the final plan should include adaptive management strategies for soil resources. We propose: Include a general plan (in collaboration with the BEC) to monitor soils with a commitment to identify triggers for mandatory actions and develop consequences for the failure to meet objectives as part of the management action to inventory, classify, and protect BSCs. DEIS, Vol. 1, p. 2-17, Table 2-4.	GRAZ01-General, ALT05-Alternative E, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	The Management Actions Common To All Alternatives in the Livestock Grazing section of the Proposed Plan will require allotment management plans and other step down implementation plans to address a variety of topics. The allotment management plans would consider BSCs.
3125-15	Steve Knox		Page 2-128, 2.4.22, Livestock Grazing, Table 2-21, 2nd 1st 2020 ROD/MMP action, Alternative E See Comment 36 below. Page 2-130, Livestock Grazing, Table 2-21, 1986 Manti-La Sal LRMP, Alternative A, Dark Canyon Wilderness Management (DCW) This action says Forest Service will Manage forage use and limit range improvement to be compatible with wilderness character. This language should be applied to all categories of lands managed for their wilderness characteristics (Wilderness, WSAs, LWC, and IRAs), under any alternative BLM and Forest Service.	GRAZ01-General, ALT07-Modification of Existing Alternatives	USDA Forest Service manages activities within the designated Dark Canyon Wilderness to preserve and protect wilderness character, as required by the Wilderness Act. Management direction for the Dark Canyon Wilderness will remain in the Forest Plan and will not be included in this plan. This management only pertains to designated wilderness areas, not to other designated areas such as wilderness study areas (WSAs) or inventoried roadless areas (IRAs) or to lands with wilderness characteristics (LWC applies to BLM-administered lands only). WSAs, IRAs, and LWCs have their own applicable management direction that is summarized in Chapter 2 of the PRMP/FEIS. For example, IRAs maintain roadless characteristics as described in the 2001 Roadless Rule.
14767-159	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Next lets move to the livestock grazing section 2.4.22. As we will discuss in detail in a later sections dealing with the EISs failure to analyze impacts in relation to the protect and restore mandate, the DRMP treats livestock grazing as a given. The aspirational goals are: Protect and restore healthy native rangelands. Implement livestock grazing management practices to meet standards for rangeland health in a manner that is consistent with the protection of BENM objects. Manage grazing to minimize or eliminate intrusion of nonnative grass and plant species due to grazing-related activities. What grazing practices are consistent with the protection of BENM objects is undefined and unanalyzed. But what is evident from the EIS and DRPM is that the BLM is considering status quo livestock grazing as consistent, even though it provides no rational support for that assertion. How would these practices whatever they are, we dont know, be implemented? BENM was first established nearly a decade ago and no changes to livestock grazing have been made, except more bulldozing water developments, fences, wells and pipelines, all of which further degraded objects. As discussed earlier, the BLM has become addicted to FLPMA 402c2 and has essentially stopped doing NEPA for permit renewals. So the only trigger to implement practices no longer exists. How would livestock grazing be managed to minimize the spread of invasives? The EIS and DRMP are silent. How would these management changes be implemented in light of the BLMs 402c2 addiction? How effective would these actions that likely will never be implemented, be? How is, possibly, maybe, reducing the rate of spread slightly be implementing the BLMs protect and restore mandate? What are the key factors i.e. soil disturbance and destruction/elimination of BSC, for the spread of invasives and how are they impacted by the discretionary use of livestock grazing? Does continuing livestock grazing restore the BSC needed to prevent invasives? None of these obvious questions were asked or answered. That failure violates NEPAs hard look requirement.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan also includes prioritizing 6 allotments for the completion of rangeland health assessments within 3 years and NEPA within 6 years of the signing of a ROD for this planning effort. See Chapter 3 for discussion of impacts from livestock grazing to resources including BENM objects, BSC, and invasive plants.
14767-163	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	And lastly in this section, we see a promise from the BLM to implement its regulatory requirements. That is reassuring. The BLM saying they will do what they are required to do. Most of the alternatives are based off of Alt A: Utilization levels would continue to be the same as those disclosed in the 2008 Monticello RMP and the 2020 ROD/MMPs as follows: Per 2008 Monticello RMP For BLM-administered allotments, desired utilization levels as management guidelines for key forage species would be identified as needed to monitor use levels on an allotment-specific basis to achieve desired future condition. Where utilization levels have not been established, a use level of 50% would be the management guideline. Utilization is the proportion or degree of current years forage production that is consumed or removed by animals (including insects). Utilization data should be analyzed in conjunction with climate, actual grazing use, current or historic impacts (e.g., wildfire, livestock, wildlife, insects), and long-term trend data to help evaluate existing management and design future management to meet land use plan objectives. Per 2020 ROD/MMPs For allotments administered by the USDA Forest Service, proper use criteria (unless specified elsewhere in the 1986 Manti-La Sal LRMP or in an AMP for uplands are identified as 40% to 55% (season-long use), 45% to 60% (deferred rotation), and 55% to 65% (rest rotation) use of key species. Proper use criteria for riparian areas are identified as 50% to 60% (spring), 45% to 50% (summer), and 30% to 40% (fall) use or 4- to 5-inch stubble or regrowth of key species. So compliance is optional (guideline) and is up to 65% which has no scientific basis, as discussed earlier. For Alterative C: Utilization levels on key forage species would be identified on an allotment-specific basis. Livestock grazing levels would be managed to meet the goals and objectives in this plan. Key forage species would typically include native species but may include nonnative placeholder forage species as necessary to preclude the spread of noxious weeds. But this will not be triggered because BLM no longer does NEPA. Further, as laid out in the planning handbook Appendix C, sideboards and specifics are required to be put in the RMP, not punted to some unknown future. For Alt D: Same as Alternative A except that, where not otherwise established, utilization levels would be 30% until monitoring data are used to identify an appropriate utilization level. Reducing the utilization rate by ~40% without adjusting the permitted AUMs is a meaningless paper exercise, because the same number of cows will graze for the same	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines. Utilization levels would take forage needs of wildlife into consideration and are monitored. Grazing permit compliance will continue under the Proposed Plan. The Management Actions by Alternative in the Livestock Grazing section states the following: The agencies, working collaboratively with the BEC, would: Prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments, to protect Monument objects BENM objects. And coordinate with the BEC on opportunities for joint data collection and/or analysis.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			period of time, over the same area. The BLM rarely monitors utilization, and when it does, it uses the wildly subjective ocular guess method. So the above may look nice on paper, its loopholes within loopholes renders it meaningless. Alternative E suffers from similar fatal flaws: Utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines		
14767-164	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	All the alternatives allow further water developments, pipelines, fences, seeding and other so-called range improvements for emphasizing private livestock production as long as the BLM manufactures rationale that, as it has over the last few years, they are to protect objects. Grazing would be managed so as to reduce impacts to soil erosion and damage to BSCs and in a way that protects Tribal access to culturally important plants, including trees. Grazing would be managed to protect streams, springs, and other important riparian areas. These general goals, in the actions section, have no requirements or limitations to achieve those goals, as required by Appendix C of the planning handbook. Even the apparent commitments for Alt B (land health assessments and do full processing likely another 402c2 rubber stamping on a quarter of the allotments within 6 years) and D (land health assessments and do full processing likely another 402c2 rubber stamping for all allotments within a decade) is vitiated by the fact that, at best, they will be using the land health standards for multiple use lands which are far below that level needed to protect and restore objects.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Goals and Objectives of the Livestock Grazing section apply to all alternatives, including the Proposed Plan. The Proposed Plan prohibits new range improvements or modifications to existing range improvements, for livestock grazing purposes, unless: • The primary purpose is to protect BENM objects; and • BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed. Also in the Management Actions by Alternative in the Livestock Grazing section the Proposed Plan would not authorize new groundwater withdrawals or diversions unless necessary to ensure the protection of BENM objects and a hydrologic study would be required. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.
15116-2	Michele Ivins Halls 479 E Eagleridge Dr North Salt Lake, UT 84054		Management actions common to all alternatives (2.4.22.2) should ALSO include collaboration with local ranchers who know what they are doing. Their grazing practices are most consistent with Grazing Alternative A and B.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Livestock Grazing section of the Proposed Plan, the agencies would collaborate with the BEC and grazing permittees when developing grazing permit terms and conditions. Additionally, in considering subsequent site-specific grazing permit actions under NEPA, the agencies would coordinate with stakeholders which includes local ranchers and permit holders. The Proposed Plan was clarified to include this coordination with permittees.
15209-2	Carson Halls UT		My familys grazing management practices are consistent with standards that maintain, protect, and restore the rangeland health and well-being, to use words from the BENM Livestock Grazing goals and objectives. Management actions common to all alternatives (2.4.22.2) should ALSO include collaboration with local ranchers who know what they are doing. Their grazing practices are most consistent with Grazing Alternative A and B.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Management Actions Common to All Alternatives in the Livestock Grazing section includes management to collaborate with the BEC and grazing permittees when developing grazing permit terms and conditions. Additionally, the NEPA Process includes coordination with stakeholders which includes local ranchers and permit holders.
15381-1	Sagebrush Habitat Conservation Fund		ES 4.3 Alternative B, Livestock Grazing Here is the first introduction of the term unavailable/unsuitable for livestock grazing. No place in the document is this term defined. There are no criteria stated for determining areas unavailable/unsuitable. Without the criteria there is no way for the reader to evaluate how meaningful they are or how well they have been applied. If we use the standard definition of suitability within the field of rangeland management, we suspect there are far more unsuitable acres than are accounted for. These would include badlands, barren, slickrock areas as well as areas more than two miles from water and areas of steep slopes. If these are all accounted for, we suspect far more than 10% of the Monument would be unsuitable. As for unavailable areas, that is a management determination that cannot be evaluated or analyzed without the criteria being disclosed. We request the final RMP/EIS address the following: -Definitions and criteria for both unsuitable and unavailable. -It is not clear whether these areas are presently grazed, ungrazed, or available for grazing. -How the criteria and definitions are applied and whether they are applied uniformly across the planning area. -Since the acreage determined to be unsuitable/unavailable varies by alternative, we must assume either the criteria were different or applied differently in each alternative. These differences should be explained and accounted for. -What is the actual effect of these areas? Does it mean livestock are prohibited in those areas, or does it mean the forage in those areas is not allocated to livestock, but livestock can still freely access those areas? The analysis sections imply those areas would be protected from livestock impacts. That will only occur if livestock are prohibited. If livestock are permitted free access to the unavailable/unsuitable areas, the analysis of impacts should not assume full protection from livestock impacts. -If livestock are not allowed in unsuitable/unavailable areas what is the mechanism for keeping livestock out? Will this require additional fencing? Closure to livestock in adjacent areas? -There is no timeframe identified. When would the unavailable/unsuitable designations take effect? This comment refers to all discussion of unavailable/unsuitable for livestock within the Draft RMP/EIS, not just within the Executive Summary.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The definition of unavailable (BLM) and not suitable (USDA Forest Service) will be added to the final EIS. BLM Land Use Plan Handbook H1601 in Appendix C.II.B provides the criteria for identifying lands available or not available for livestock grazing. In the Management Actions by Alternative in the Livestock Grazing section, livestock would be physically restricted from these areas based upon topography (e.g., cliff lines) and/or fences. Site specific barriers (e.g., fences) would be done at the implementation level decision, yet these areas essentially have current barriers or fences that can already exclude livestock at the time the Record of Decision is issued. It would not require areas being made unavailable in adjacent areas because existing barriers were used to form the boundaries. The Proposed Plan includes acres unavailable to grazing and limited to trailing only that are currently grazed. The unavailable allocation would take effect once the ROD is signed, however, the BLM would need to undertake additional processes to modify permits or to construct fences if needed to prevent access, if necessary.
15381-19	Sagebrush Habitat Conservation Fund		There is a general assumption that under all alternatives, livestock management facilities like fences, water projects, vegetation manipulation will be maintained, and new ones will continue to be developed as per past practice, except for some limitations dealing with riparian areas. There is no justification for continuing past practices. Development of new projects are discretionary actions are being treated as though they are on autopilot.	GRAZ01-General, ALT07-Modification of Existing Alternatives	In the Management Actions by Alternative in the Livestock Grazing section the Proposed Plan states: prohibit new range improvements or modifications to existing range improvements, for livestock grazing purposes, unless: The primary purpose is to protect BENM objects; and, for BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed, and, if needed, a causal factor determination has been made for the allotment or applicable watershed. As informed by the land health assessment and causal factor determination, the new/modified range improvements would support the achievement of the BLM Utah Rangeland Health Standards. An exception to this requirement could be approved for new/modifications to range improvements to prevent imminent damage to BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17577-1	Wayne Y Hoskisson		The way grazing utilization is managed also needs to be changed. On far too many allotment assessments I noted the conclusion was that the allotment was progressing towards desired conditions or the ecological site description. The same conclusion seemed to be made many times without the allotment ever reaching the appropriate ecological site description or desired conditions. Whenever an allotment is assessed as progressing towards desired conditions the assessment should also include when the BLM or FS expects the allotment to reach the desired condition and state specific actions to be taken if an allotment is not meeting those desired conditions. Generally the most effective actions to reach desired conditions would be rest and/or stocking rate reductions. The BLM and FS are now managing a National Monument not a commercial livestock industry.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS. Also, under the Proposed Plan the agencies would develop and implement allotment management plans (AMPs) for all allotments within BENM as necessary, in collaboration with the BEC. Development and implementation of AMPs would include analysis of the allotment, including evaluating range improvements and stocking rates, as needed, and ensure consistency with protection of BENM objects. If there is an existing AMP, the agencies will consider whether the AMP needs to be renewed or adjusted in collaboration with the BEC.
17617-16	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	We recommend that 3-5 years after the ROD, land assessments for appropriateness and forage assessments be conducted centering Traditional Ecological Knowledge on sensitive grazing allotments, including Moqui Canyon-Lower, Dry Wash, Harts Draw Pasture, Road Canyon Pasture, Snow Flat Pasture, Slickhorn Pasture, Happy Jack Pasture, Gravel Canyon Pasture, throughout Indian Creek, Point Lookout Pasture, Dry Wash and Bullfrog Pastures, Lime Creek Tuerto Canyon and Milk Ranch Point and 10 years after the ROD for all grazing leases to ensure that the objects and resources of BENM are adequately protected and managed for. Currently, BLM preference is to wait for 10 year permits to approach renewal to assess ecological health and Monument objects/compatibility. Bears Ears Partnership feel strongly that this interval should be shortened significantly so that damage is interrupted and mitigated at the earliest possible time.	GRAZ01-General, ALT07-Modification of Existing Alternatives	This RMP does not change the way grazing permits are renewed. They will be renewed in accordance with the current protocol and process. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.
17683-5	multiple form plus senders see Excel attachment; Fabiola Delgado	Center for Biological Diversity; Center for Biological Diversity	ABSOLUTELY NO CATTLE!!! Livestock grazing is damaging the same cultural sites, native vegetation, wildlife, habitat, soil, and riparian areas that the monument was designated to protect.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in Livestock Grazing, Soil Resources, Water Resources, Vegetation, Wildlife and Fisheries, and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation, wildlife and cultural resources. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In addition, the Goals and Objectives of the Livestock Grazing section and Appendix G includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic/riparian functions.
17969-10	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Any decision to remove grazing should be firmly based on evidence that grazing is the causal factor, distinguished from drought and other land uses such as recreation. That evidence, which could be informed by ongoing research at the CRC, is now lacking. The proposal to eliminate grazing in these pastures is based on Assessment, Inventory, and Monitoring (AIM) data and benchmark analysis. The ecosystems of the Indian Creek unit are very complex to understand, requiring research that begins to disentangle the relative contributions of current livestock use and management, past overgrazing, and ongoing aridification and drought. From the data provided in the draft RMP & EIS, there does not appear to be sufficient data to support current grazing as a driver of the declines in rangeland condition described. Trends observed in the AIM data start in a wetter period with high perennial cover (2013-2017) and continue into a drier period with lower cover (2019-2021). This trend is not limited to grazed pastures, but also has been observed in a nearby never-grazed site (See Figure 1, Duniway et al. 3 2023). It is therefore not possible to conclude that trends used to propose eliminating grazing in the Indian Creek Allotment are due to livestock impacts, nor that trends in plant cover would have been more desirable if livestock grazing had not occurred. In summary, TNC recommends that the Proposed RMP/Final EIS enable BENM livestock permittees to implement traditional and innovative technologies and range improvements in consultation with the BEC that research and facilitate sustainable grazing, healthy rangeland and protection of BENM objects and that any of the Indian Creek pasture closures or restrictions are not carried forward into the Proposed RMP/Final EIS.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, the North Cottonwood and North Cottonwood Upper pastures would be limited to trailing only. This decision was informed by AIM data that indicates that the riparian areas present along North Cottonwood are departed from expected values.
18082-32	Shannon Snyder. Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Page 2-128 of the Draft EIS states: Grazing would be managed to protect streams, springs, and other important riparian areas under Alternative E. However, the Draft EIS does not discuss concrete steps that would be taken to ensure this. The EPA recommends including under the final chosen alternative the provisions specified under Alternative D on page 2-128, such as excluding livestock from perennial surface waters, except for existing stock ponds, and associated riparian areas and springs. The EPA notes that recommendations along these lines are suggested by some Tribal members in the BEITC LMP (Appendix L, page 35) and that Alternative E maximizes the consideration and use of Tribal perspectives on managing the landscape of [the Bears Ears National Monument] (Draft EIS, page ES-9). We also note there are livestock grazing BMPs in Appendix G, however, it appears these are not mandatory. We recommend the chosen alternative include mandatory actions that would apply to livestock grazing on the Monument or discuss the impacts that could be expected to occur if the non-mandatory BMPs are not implemented.	GRAZ01-General, ALT07-Modification of Existing Alternatives	All permits include the following stipulation: Grazing management practices will comply with Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah (1997). These guidelines are very similar to what is included in Appendix G. This includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic/riparian functions.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18082-33	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The EPA notes that there is a small reduction in acreage within the planning area where livestock are permitted to graze under the Preferred Alternative (Alternative E) in comparison to the No Action Alternative (Alternative A). However, the permitted AUMs and HMs are the same under both alternatives (Table 3-145). We recommend the Final EIS include the rationale for why there isnt a broader range of livestock grazing alternatives (e.g., a range of acreages closed to livestock grazing and AUMs available).	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan would not alter currently allocated AUMs as outlined in the Management Actions by Alternative in the Livestock Grazing section. Modifications to AUMs would be done at the site-specific implementation level planning process. Under the Proposed Plan the agencies would develop and implement allotment management plans (AMPs) for all allotments within BENM as necessary, in collaboration with the BEC. Development and implementation of AMPs would include analysis of the allotment, including evaluating range improvements and stocking rates, as needed, and ensure consistency with protection of BENM objects. The process of relinquishment of grazing permits is included in the Proposed Plan as provided for in Proclamation 10285. This could lead to reductions in AUMs. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
18082-35	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Page 2-129 of the Draft EIS states for Alternatives B and C that within 3 years the BLM must complete land health assessments on three specific allotments/areas, and if needed, causal factor determinations. For Alternative D, it states that within 10 years the BLM must complete land health assessments on all BLM-administered lands, and if needed, causal factor determinations. However, for the Preferred Alternative, it says there is no similar management. To meet the goal, Implement livestock grazing management practices to meet standards for rangeland health in a manner that is consistent with the protection of BENM objects the EPA recommends that the chosen alternative in the Final EIS prioritize land health assessments and causal factor determinations on BLM-administered lands in the Monument and set a reasonable timeframe for completion. We also recommend evaluating whether Land Health Standards are adequate for protection of Monument ROVs since those standards were not developed for this purpose, and whether more stringent standards are needed.	GRAZ01-General, ALT07-Modification of Existing Alternatives	In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewal EAs will be guided by current land health evaluations. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable.
18082-42	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Public Employees for Environmental Responsibility (PEER) published data regarding BLM rangeland health and grazing. ¹⁴ It analyzed data from the BLM Rangeland Administration System that showed that over the last 10 years the percentage of grazing permits issued without any NEPA analysis increased, and the percentage of permits issued without a NEPA analysis is even higher for allotments with significant environmental resources (e.g., National Monuments and National Conservation Areas, ESA-designated critical habitat, and highest priority Greater sage-grouse habitat). Specifically for fiscal year 2022, 63% of all grazing permits were issued without a NEPA analysis, and the percentage of grazing permits issued without a NEPA analysis was higher for allotments with special resources (e.g., 75% for allotments that overlap with National Monuments and National Conservation Areas). According to these data, for BENM the BLM has only completed one NEPA review for over 100 current permits. We support the BLM prioritizing the review and processing of grazing permits and leases (p. 2-125). However, we have the following recommendations for the chosen alternative in the Final EIS and RMP. Prioritize LHS Assessments and grazing permit renewals in the Monument and include timeframes for completion. Include provisions requiring future NEPA analyses prior to issuing or renewing livestock grazing permits in the Monument and provide specific mechanisms to make adjustments during the permit term when allotments fail to meet permit conditions and/or LHS. The BLM could determine changes are needed to the terms and conditions of the grazing permit such as season of use, number of livestock, or additional monitoring. Include a timeframe for completion of adjustments. Prioritize monitoring and enforcement of grazing permits in the Monument.	GRAZ01-General, ALT07-Modification of Existing Alternatives	In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewal EAs will be guided by current land health evaluations. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable.
18330-10	Rose Chilcoat 2914 Junction St Durango, CO 81301		Ongoing monitoring and assessments must be scheduled and completed. Failure to do so should result in livestock grazing not being authorized until the assessments can be done.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort.
18330-4	Rose Chilcoat 2914 Junction St Durango, CO 81301		Grazing of domestic livestock on the Colorado Plateau is not a sustainable use of this landscape. It did not evolve with large herds of cattle like creatures. Large herds of native bighorn sheep prevailed and should prevail again. BLM and USFS must manage grazing allotments to the highest standard of land health and riparian health within the Monument. If this is not economic for the rancher that should not be the agencys concern. Protection of Monument resources should be paramount. The proclamation allows for permanent retirement of grazing permits with compensation to ranchers who would be affected. A strong RMP may provide the incentive for ranchers to take the buyouts and retire their allotments. It is time to do what is right for the resource.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The process of relinquishment of grazing permits is included in the Proposed Plan, see the Management Actions by Alternative in the Livestock Grazing section, consistent with Proclamation 10285.
18330-5	Rose Chilcoat 2914 Junction St Durango, CO 81301		Land Health Assessments must be prioritized for allotments that have not evaluations or determinations such as in Lake Canyon, Texas-Muley, Slickhorn and Cottonwood allotments. These are allotments that are in extremely poor condition due to many decades of over grazing by domestic cattle. Other allotments such as Comb Wash, Perkins North, and White Canyon do not have a clear status and there does not seem to be any determination as to land health and causes of failure to achieve standards. (Data from PEER website based upon FOIAs of BLM records https://mangomap.com/peer/maps/144094/BLM-Rangeland-Health-Status-(2024)—The-Significance-of-Livestock-Grazing-on-Public-	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. This includes the following BLM allotments Comb Wash, Indian Creek, Slickhorn, White Canyon, Perkins North and Tank Bench/Brushy Basin. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			Lands?_gl=1*1t7jks9*_ga*MTE4NDYxMjkwMC4xNzE4MTQ2MDI5*_ga_05P1NCLCQP*MTcxODE0NjAyOS4xLjEuMTcxODE0NjA1MS4wLjAuMA..#) Continued livestock grazing in these landscapes where native bunchgrasses are disappearing and forbs greatly diminished, where biological soil crusts are crushed and eliminated causing erosion and dust events, where rare riparian habitats are reduced to a fraction of their potential, where cultural resources are trampled and eroded due to livestock, is simply an unacceptable use as has happened with current management.		section includes areas that are available/suitable and unavailable/unsuitable to grazing. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation, and Cultural Resources sections include management actions for the protection of soils, water resources, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources are disclosed in Chapter 3.
18330-7	Rose Chilcoat 2914 Junction St Durango, CO 81301		No grazing permit within the Monument should be renewed without a full Environmental Impact Statement. This has not happened for most allotments. It is a complete failure of the publics trust and ability to weigh in for grazing permits to be automatically renewed without the hard look at impacts required per the National Environmental Protection Act. The RMP can set a new standard for renewals that serves the American public instead of the ranching community.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.
18330-8	Rose Chilcoat 2914 Junction St Durango, CO 81301		Large areas of the Monument in various Ecological Sites should be set aside as un-grazed reference areas where scientific study of recovery without grazing pressure can occur and agency staff can calibrate what actual productivity looks like in these ecosystems.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Ecological site groups are discussed in Appendix N. Ecological site groups for areas unavailable for grazing are provided in Chapter 3. Under the Proposed Plan, more acres would be unavailable to grazing and limited to trailing only, compared to current management.
18330-9	Rose Chilcoat 2914 Junction St Durango, CO 81301		Land Health Evaluations (LHE) must be completed within a couple of years of RMP ROD. Any LHE that fails to meet one or more standards where livestock grazing is determined to be a significant factor must face significant management changes reduced actual numbers of head each season, reduced season of use, years of non-use in order to allow actual recovery of key species expected in each Ecological Site Description. The extreme drought conditions the Bears Ears landscapes have experienced for the past 24 years are taking a toll. Livestock are not a compatible use given the climate stresses in this region.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.
18612-3	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	Additional acreage should be made unavailable to grazing from areas that are currently grazed. Candidates could include: – sites that are damaged by livestock and need to be restored – sites that have conflicting resource values with livestock (e.g., recreation, wildlife habitat) – sites that are in good condition that need to be protected – all allotments and pastures listed in Alt D	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing or limited to trailing. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
18612-8	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	The LUP discusses livestock grazing on page 35. It expresses concerns that livestock overgrazing could affect important tribal values, such as springs and waterways, with contamination and erosion. Culturally important plants could be negatively impacted by livestock, and degraded vegetation could result in reduced prey-base for raptors. The BEITC LUP grazing section should be a greater part of the preferred alternative. For example, the LUP says If livestock is going to remain within BENM, they need to be cared for properly so they do not destroy the land. The plan suggests using range riders to protect both monument objects and cattle themselves. This has been an effective method of management where it has been employed. In many areas range riders defend stock from predators, but they also have additional benefits, including early detection of disease, health problems, or birthing complications. This can increase stock survival and productivity rates. Range riders also respond more quickly to livestock damage to vegetation, soils, cultural, and paleontological objects, preventing impacts to monument objects. It could provide rare employment opportunities. Finally, accompanying livestock on a daily basis provides an opportunity for ranchers to more authentically practice the grazing culture and custom. Recommendations 7 - In accordance with the LUP and the co-stewardship mandate for BENM, we recommend that the RMP add a provision requiring cowboys, or range riders, to accompany livestock.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Routine management of livestock may include the use of "cowboys" or "range riders" to distribute livestock, maintain range improvements, and other duties associated with livestock management. Requiring these specific monitoring approaches is outside the scope of this Plan.
18708-6	Heidi Blankenship Blanding, UT 84511		If stock use is to be allowed in the Grand Gulch, some method of trail monitoring, management, and maintenance needs to be developed. The areas listed that would be open to stock are not currently safe for most equestrians to ride (Collins at the confluence of the Gulch, Government from the rim to the floor of the Gulch, the interior corridor of the Grand Gulch).	GRAZ01-General, ALT07-Modification of Existing Alternatives	Trail use and users would be addressed in implementation level planning, likely as part of a RAMP for the Cedar Mesa MA or a Travel Plan. Current trail use is carried forward from the 2008 plan. Until implementation level planning, specific issues with trails, such as safety concerns, could be addressed in the stipulations attached to ISRPs.
18927-2	Daniel Kent 399 E 100N Moab, UT 84532	Friends of the Abajos	I have spent most of my adult life witnessing and documenting the many negative impacts of cattle grazing on this fragile sandy desert here in Southeastern Utah. I have written hundreds of letters in opposition to this use of the sandy, steep, highly erosive Canyonlands and have documented countless places where this use has wrought irreparable devastation on public lands, most of which are still vulnerable to this day. The radiating affects of cattle grazing in this environment and the many associated destructive activities, such as vegetation conversion projects, stream alteration, wildlife competition and wildlife elimination through predator assassination and other lethal to wildlife rancher support projects, can never be mitigated fully and have no place in a National Monument, especially one like this with such vast, ubiquitous archeological resources and such a wide range of potentially healthy populations of animals deemed threatening to livestock operations. Therefore, the management plan should: 1- phase out ALL cattle grazing, starting first with eliminating grazing in springs and fragile watersheds and erosive features subject to catastrophic collapse when improperly grazed 2- end ALL so-called revegetation, restoration and fire prevention projects whose primary goals include habitat improvement for livestock 3- outlaw predator hunting and Wildlife Services-style elimination of ranchers pests such as prairie dogs, snakes, raptors, coyotes, wolves, cougars, bears,	GRAZ01-General, ALT07-Modification of Existing Alternatives	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely. The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing or limited to trailing. See the Proposed Plan in the Fire Management and Vegetation section. Prior to approval of any site-specific proposals for vegetation treatment, the BLM and USDA Forest Service would perform any necessary environmental analysis and reviews, including a determination of whether the activity is consistent with the proper care and management of BENM objects and values. This evaluation would include cultural resource surveys, impacts analyses, and identification of any applicable mitigation actions, which may include altering prescribed treatment methods or the location of treatments. Legal hunting is outside of the scope of this RMP and falls under the jurisdiction of the State/UDWR. The Proposed Plan in the Livestock Grazing, Water Resources, Vegetation, and Cultural Resources sections include management actions for the protection of water resources, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			gophers, et.al. There should be no reason to be pre-emptively killing any wildlife or plants for stock growers AT ALL in the monument. 4- prohibit special dispensations, allowances, seats-at-the-table or any kind of preferential treatment for ranchers/permittees.		
491-1	Robert Wilcox, Kathryn Wilcox		I believe it is in the best interest of the monument that you continue to give the ranchers the ability to make range improvements. It will not only add to the beauty of the area, but they will help manage the area where the BLM is short handed and isnt always able to be in that area. I have seen areas in this area where it is shut down to everything and the land seems to diminish. On the other hand, I have seen the areas that are used for grazing, and those areas seem to flourish with the amount of growth and management to the area. Please continue to let ranchers make improvements to the grazing lands.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Management Actions by Alternatives section in the Proposed Plan for Livestock Grazing would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. On BLM-administered lands, a current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. Under the Proposed Plan, existing range improvements for livestock grazing not consistent with the protection of BENM objects would be removed, modified, or abandoned to be consistent with such protection.
51-1	Advocate for BLM grazing reforms		Grazing is common in most of this national monument as are its impacts on natural and cultural resources. Grazing spreads invasive plants that alter fuels and increase the risk of catastrophic habitat converting fires. Grazing removes limited vegetation and surface water that would otherwise be available for wildlife. The attachments describe the types of adverse impacts that continued grazing would cause in this national monument. Please read this information and apply it to this NEPA analysis. In particular, please revise the NEPA analysis to objectively evaluate a grazing reduction alternative that better comports with the science. Monument protection is the "dominant reservation" and supersedes normal FLPMA, PRIA, and Taylor Grazing Act grazing management.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Management Actions by Alternatives section in the Proposed Plan for Livestock Grazing, more land would be unavailable to grazing and limited to trailing only, compared to existing management conditions. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Livestock grazing impacts to natural and cultural resources are disclosed in Chapter 3.
7339-7			For livestock grazing, we advocate a standard measure across the Monument to track and assess range health and to align evaluation intervals and forage assessments,	GRAZ01-General, ALT07-Modification of Existing Alternatives	In the Management Actions by Alternatives section in the Proposed Plan for Livestock Grazing, it states that within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewals will be guided by current land health evaluations. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. The BLM will also continue to monitor and/or administer Rangeland Health evaluations (of which PFC is a part of) of the rest of the allotments within or partially within BENM.
9011-1	Anne Dal Vera		Also, it is important to include the closures of livestock grazing addressed in Alternative D. It is important to have a way to close an allotment if it becomes vacant or if a permittee chooses to accept a buyout to retire the allotment.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Presidential Proclamation 10285 states: "Should grazing permits or leases be voluntarily relinquished by existing holders, the Secretaries shall retire from livestock grazing the lands covered by such permits or leases pursuant to the processes of applicable law." The process of relinquishment is further clarified in the Proposed Plan in the Management Actions by Alternatives section for Livestock Grazing. Under the Proposed Plan, the Livestock Grazing section, more land would be unavailable to grazing and limited to trailing only, compared to existing management conditions.
914-1	Nikki Shurack		Please restrict livestock grazing utilization levels to 30% only and unless a higher level of grazing is still protective of monument objects and values.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan livestock grazing would be managed, subject to terms and conditions, in a manner consistent with the protection of Monument objects. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS.
9160-2	Gary Stetler 329 IRON HORSE CT. GRAND JUNCTION, 81507		I have concerns about the extent of grazing allowed by alternatives other than D. The Colorado Plateau, containing BENM, is one of the fastest-warming regions in North America, stressing grasslands, pinyons, and junipers. Although livestock grazing has been a traditional use, I am concerned that with our rapidly warming climate, grazing will become too destructive if it is not reduced.	GRAZ01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, in the Management Actions by Alternatives section for Livestock Grazing, more land would be unavailable to grazing and limited to trailing only, compared to existing management conditions. The impacts of livestock grazing on natural resources is disclosed throughout Chapter 3 and includes consideration of the impacts of climate change. The Proposed Plan in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
9313-1	Washington County Utah resident		Grazing threatens BENM objects through direct, indirect, and cumulative adverse impacts. Alternatives D and E should be strengthened to better respond to these impacts. More allotments should be closed, no new range improvements allowed, and utilization levels dropped to thirty percent or less. All streams, springs, and seeps should be off limits to cattle. Protecting BENM objects is the dominant legal requirement and supersedes normal multiple use management on public domain lands. The final BENM plan must contain decisions and designations that will collectively fulfill that dominant requirement.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan in the Livestock Grazing section and Water Resources section include management actions for the protection of water resources. In the Management Actions by Alternatives section for Livestock Grazing, the Proposed Plan would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. Under the Proposed Plan, in the Management Actions by Alternatives section for Livestock Grazing, more land would be unavailable to grazing and limited to trailing only, compared to existing management conditions. Under the Proposed Plan livestock grazing

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					would be managed, subject to terms and conditions, in a manner consistent with the protection of Monument objects. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. Under the Proposed Plan, utilization levels would be identified on an allotment-specific basis, taking forage needs of wildlife into consideration. These utilization levels would be established within two years of the release of this RMP/EIS.
F13-4			Livestock grazing is damaging the same cultural sites, native vegetation, wildlife, habitat, soil, and riparian areas that the monument was designated to protect. This needs to change. The final resource-management plan for Bears Ears should require compliance monitoring and resource assessments from federal agencies, prohibit new water developments, and exclude livestock grazing from creeks, springs, riparian areas, and other habitats and cultural sites where its harm is incompatible with the protection of monument objects.	GRAZ01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan in Section the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation, wildlife and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternatives section for Livestock Grazing, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and, for BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
15381-6	Sagebrush Habitat Conservation Fund		Table 2-21. Alternatives for Livestock Grazing. No place in the document is the criteria for determining areas unavailable/unsuitable given. Without knowing the criteria there is no way for the reader to evaluate how meaningful they are or how well they have been applied. If we are to use the standard definition of suitability within the field of rangeland management, we suspect there are far more unsuitable acres than stated in the alternatives. These would include badlands, barren, slickrock areas as well as areas more than two miles from water and areas of steep slopes. If these are all accounted for, we suspect far more than 10% of the Monument would be unsuitable. As for unavailable areas, this is a management determination that cannot be evaluated or analyzed without the criteria being disclosed. We request the final RMP/EIS address the following: -Definitions and criteria for both unsuitable and unavailable. -It is not clear whether these areas are presently being grazed or are just available for grazing. -How the criteria and definitions were applied and whether they were applied uniformly across the planning area. -Since the acreage determined to be unsuitable/unavailable varies by alternative, we must assume either the criteria were different or applied differently in each alternative. These differences should be explained and accounted for. - What is the actual effect of these areas? Does it mean livestock are prohibited in those areas, or does it mean the forage in those areas is not allocated to livestock, but livestock can still freely access those areas? The analysis sections imply those areas would be protected from livestock impacts. That will only occur if livestock are prohibited. If livestock are permitted free access to the unavailable/unsuitable areas, the analysis of impacts should not assume full protection from livestock impacts. -If livestock are not allowed in unsuitable/unavailable areas what is the mechanism for keeping livestock out? Will this require additional fencing? Closure to livestock in adjacent areas? -There is no timeframe identified. When would the unavailable/unsuitable designations take effect? This section mentions generic monitoring. To be meaningful, the type and frequency of monitoring should be specified. Current rangeland monitoring includes utilization (more thoroughly addressed below), and trend. Trend studies are problematic because they do not consider range condition. A static trend on a severely damaged range site is quite different from a static trend on a site near the ESD description. Rangeland condition studies, at least partially using ESD for baseline must be included. The other issue with current BLM trend studies is they focus on a few, key livestock forage species rather than the health of the ecological site. Rangeland management by BLM should be concerned with more than just what cows eat. Limiting livestock use to trailing only can be an appropriate management action. To be meaningful, the term trailing must be defined. We have seen too many examples where trailing consists of a permit to drift livestock through an area over a period of weeks or months. Trailing must be defined to include time limitations, miles per day to be covered. Utilization Levels. This action is impossible to evaluate without specifying utilization levels and monitoring methods. Current utilization is based on percentage of plant weight removed as estimated by the range specialist through visual inspection. Utilization standards should be based on what is left, not on what is removed. Herbaceous plants grow from the bottom up, livestock eat from the top down. Under current standards 100% of the flowers/seedheads can be removed under light utilization. This not only removes the seed source for future plant replacement/recruitment, but it also removes important resources in terms of native pollinators and ethnobotany/traditional plant uses. Utilization levels are related to soil moisture and temperature and ground level wind exposure and snow retention. None of these are addressed in the document but all are critical to site health. The method of determining utilization should be more reliable and repeatable than what is currently achieved though ocular reconnaissance. Also, current utilization standards tend to focus on one or two key forage plants, hardly a holistic approach that gets to assessing effects on biodiversity and	GRAZ01-General, ALT07-Modification of Existing Alternatives, DECI04-Mitigation and Monitoring	The definition of unavailable (BLM) and not suitable (USDA Forest Service) has been added to the final EIS. BLM Land Use Plan Handbook H1601 in Appendix C.II.B provides the criteria for identifying lands available or not available for livestock grazing. In the Proposed Plan, within the Management Actions by Alternatives section for Livestock Grazing, livestock would be physically restricted from these areas based upon topography (e.g., cliff lines) and/or fences. Site specific barriers (e.g., fences) would be done as a part of implementation level planning., Many of these areas have barriers or fences that already exclude livestock. It would not require areas being made unavailable in adjacent areas because existing barriers were used to form the boundaries. The Proposed Plan includes acres unavailable to grazing and limited to trailing only that are currently grazed. The unavailable allocation would take effect once the ROD is signed, however, the BLM would need to undertake additional processes to modify permits or to construct fences if needed to prevent access, if necessary.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			rangeland health. Utilization studies need to focus on ecological community health, not just amount of forage removal on one or two grass species. Drought Management. The proposal under Alternatives B, C, and D, seem to be well thought out and at least directs some action. The proposal under Alternative E might as well be the same as the No Action Alternative. A promise to develop a plan at some undetermined point in the future is hardly a way to actively address drought. We would suggest the Alternative B approach be used for Alternative E unless or until a better drought management plan is developed. Utah has experienced a 20+ year megadrought that may well not be over based on a good year or two. As of May 28, the US Drought Monitor shows San Juan County/Bears Ears as being abnormally dry. Over the past several years the Monument has been in Severe, Extreme and Exceptional drought conditions that have been persistent. We have seen no indication BLM has made adjustments to grazing to address these conditions. With the mere promise of a Drought Management Plan, we expect the No Action alternative would be implemented, no response to drought regardless of how dry and dire conditions become.		
F6-3			Improper grazing has caused, and continues to cause, significant damage to cultural sites, native vegetation, water quality and quantity, riparian areas, and soils. The final plan should require the agencies to immediately begin compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs.	GRAZ01-General, ALT07-Modification of Existing Alternatives, DECI04-Mitigation and Monitoring	The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, Vegetation and Cultural Resources sections include management actions for the protection of water resources, soils, vegetation and cultural resources. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. In the Management Actions by Alternatives section for Livestock Grazing, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, in the Livestock Grazing section it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and for BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
15381-10	Sagebrush Habitat Conservation Fund		3.4.4.2.2. Impacts Common to All Alternatives (Terrestrial Vegetation discussion continued) This section heading is not consistent with the content. It describes future actions like consultation, using Indigenous Knowledge, etc. This is not a description of impacts, these are action items, but they are so nebulous and speculative they cannot be analyzed as to their impact. There is not even an attempt at quantification. The discussion of livestock grazing impacts is all but meaningless. There is a range textbook discussion of detrimental effects livestock grazing may have. Interestingly there is no mention of damage to biological soil crusts even though they are a major issue in this plan. What remains is analysis saying grazing may have some negative impacts but due to management direction, impacts could be neutral. The term neutral needs definition. Does it mean livestock have no impact? Does it mean that degraded ranges will continue in their degraded state, and healthy rangelands will continue to be healthy? Does it mean no net loss as compared to current conditions? There is no demonstration that impacts could be neutral on the deserts of SE Utah and certainly no management action proposed that would move the needle to the neutral zone. Livestock grazing is having major impacts on vegetation, soils, riparian and ecological conditions currently. There is no reason to assume keeping present grazing management will result in anything different. In short, this discussion of impacts is mere speculation about what might or could happen without tying the impacts to any change agent within the alternatives other than the undefined acres unsuitable/unavailable for livestock.	GRAZ01-General, ALT07-Modification of Existing Alternatives, HABVEG01-Vegetation	These headers are consistent throughout the EIS to describe management and discretionary actions common to all alternatives; no change was made. Impacts to biological soil crusts under all alternatives are discussed in the Soil Resources section of Chapter 3 and Appendix N, and impacts from grazing specific to the Proposed Plan are discussed in the Livestock Grazing section of Chapter 3 and Appendix N of the RMP/EIS, see changes. Trend data, as well as the discussion about the BLM's allotment categories can be found in Appendix N, in the Travel, Transportation, and Access Management section.
11232-6	Andy Butler		I would encourage that the slightly more restrictive grazing limits of Alternative D be used in the final plan. Over the years, I've seen a great deal of damage to cultural and natural resources in BENM due to cattle grazing. I was stunned on my visit this spring to see tanker trucks providing water for livestock at virtually every side road along highway 261. This is a severe visual impact and confirms the view that the area is badly over-grazed in the era of changing, drier weather patterns. I am not anti-cow, I grew up on a cattle ranch! But BENM is not the place for them.	GRAZ01-General, ALT07-Modification of Existing Alternatives, VIS01-General	The Proposed Plan does carry forward some areas identified in Alt D as unavailable to grazing. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
786-1	BLM should not be cowed by ranchers		Cheatgrass expansion and associated devastating wildfires are primarily caused by livestock grazing. These fires can convert healthy natural landscapes and habitats into boring and sterile monocultures. These fires therefore pose a fundamental threat to BENM objects, resources, and values. But none of the DEIS alternatives would properly eliminate or even substantially reduce future BENM grazing. This shows that BLM continues to be improperly biased toward grazing over monument object protection. Please carefully review the attachment and use this highly relevant information in preparing the FEIS.	GRAZ01-General, ALT07-Modification of Existing Alternatives, WEED01-General	See Proposed Plan in the Goals and Objectives of the Livestock Grazing section. "Manage grazing to minimize or eliminate intrusion of invasive grass and plant species due to grazing-related activities" The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. The Proposed Plan in the Management Actions by Alternatives section for Livestock Grazing outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-45	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The Role of Drought in Range Management is an excellent review of the current problem with agencies current drought responses and must be incorporated into this planning process, but was ignored when we provided it during scoping.	GRAZ01-General, CC01-General, DATA03-Suggest Additional Data Source	Outlined in the Management Actions by Alternatives section for Water Resources, the Proposed Plan states the agencies would develop a formal drought management plan that is based on the best available Western scientific information and Traditional Ecological Knowledge specific to the region and regarding climate change. The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
8424-3	Janet Slowman Chee		We have to protect the land even with ranching, and I support and understand and value ranching; however, I have cows, and cows will eat anything, any kind of plant. I know up there, when I was growing up, there were certain plants that only came every two years, every three years, even every four years, and my grandparents went there to gather those plants, the special plant that came every three years or four years, and that will not be available. It will disrupt that. You know, like I said, I understand animals need to eat, but there's got to be some kind of management plan to protect that.	GRAZ01-General, CUL02-Traditional, Religious, or Cultural Use	In the Management Actions by Alternatives section in the Proposed Plan for Livestock Grazing, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewal EAs will be guided by current land health evaluations. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. The BLM and USDA Forest Service can apply restrictions Monument uses if ongoing impacts to resources are observed and restrictions are necessary to provide for the proper care and management of Monument objects including traditionally important plants.
14767-40	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In addressing range management in the RMP, the BLM should use and reference the quantitative data (including the methodologies used to collect them and the time they were collected) pertaining to the current and expected acreages which meet, or fail to meet, desired vegetative condition, and trends in vegetative condition. Using out-dated data or using methodologies which are no longer accepted, would be inappropriate. As we previously cited, the BLMs own planning handbook requires the use of the best available information.	GRAZ01-General, DATA01-Analysis Methods and Data	The agencies used the best available science and up to date BLM and USDA Forest Service data to develop the Proposed Plan. The Livestock Grazing section in Chapter 3 discusses use of AIM data and trend studies for livestock grazing management.
18082-41	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS states, Under several alternatives, land health assessments and/or causal factor determinations would be completed in certain areas within given time frames and may be used to inform livestock grazing permit renewals. Where a categorical exclusion cannot be used to fully process a grazing permit, a no grazing alternative would be considered in the NEPA document consistent with BLM Instruction Memorandum 2012-169 (p. 2-8). This statement implies that renewal of grazing permits is regularly carried out through the NEPA process, but the available data do not support this.	GRAZ01-General, DATA01-Analysis Methods and Data	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.
14767-117	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The BLM has provided no rational support for its ridiculous assertion that livestock grazing is not discretionary, and it can not provide any. This same failure infects a fatal flaw into all the alternatives. Alternative E is meant to emphasize resource protection but has the same level of livestock grazing as all the other alternatives.	GRAZ01-General, DATA02-Inadequate Methodologies	Under the Proposed Plan, the BLM closes 817 fewer acres to grazing when compared to Alternative B, C, and E. The agencies clarified the issues statement in the Terrestrial Habitat and Vegetation Resilience and Conservation section in Chapter 3 to clarify discretionary uses. Grazing management in the Proposed Plan is designed to protect resources, including objects of BENM. Proclamation 10285 states: "The Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 9558." Grazing is a discretionary action and agencies can under existing laws and regulations suspend or cancel permits and to close areas to grazing either temporarily or long-term.
14767-16	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	AMS 5.2 Livestock grazing impacts and recreation impacts can not be conflated. Recreation impacts occur on a tiny fraction of the total acres and are highly limited whereas livestock grazing impacts are nearly universal on every acre accessible to livestock.	GRAZ01-General, DATA02-Inadequate Methodologies	See Chapter 3 of the RMP/EIS for discussion of impacts from livestock grazing to resources including BENM objects, BSC, and invasive plants.
14767-189	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Next, the BLM states: Failure to properly manage soils after a disturbance can allow irreversible invasion by annual grasses (e.g., cheatgrass) and other invasive plants such as Russian thistle (Salsola tragus) as well as erosion. But the BLM is not only allowing repeated and regular destruction of BSC, far beyond what would allow for recovery, but the BLM fails to implement any proper management for recovery, which it admits will allow irreversible invasion of invasives and excessive erosion. Again, the BLM has not provided any evidence that their status quo livestock grazing would protect and restore BSC or other objects. How can irreversible invasion and excessive erosion protect and restore objects? It can't.	GRAZ01-General, DATA02-Inadequate Methodologies	The Goals and Objectives of the Livestock Grazing section and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
14767-21	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Further, often critical issues related to compatibility of discretionary uses and their impacts on protected values and purposes of the Monument are ignored. For instance, livestock grazing is the primary cause of invasive species yet there is no criteria to examine whether livestock grazing should continue despite this.	GRAZ01-General, DATA02-Inadequate Methodologies	Impacts of livestock grazing on vegetation and invasive plants is discussed in Chapter 3. As outlined in the Management Actions Common To All Alternatives in the Livestock Grazing section, livestock grazing will be implemented to meet the standards for rangeland health in a manner that is consistent with the protection of BENM objects, which include invasive species as an indicator. In addition, if monitoring indicates that domestic livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-43	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Ignored in the AMS, EIS and DRMP is the fact that livestock are significantly larger now than when the concept of the AUM was developed with the result being livestock forage consumption has increased dramatically and is now approximately 1,400 lbs for a cow calf pair, not 780 lbs. that the BLM now permits. So for example, if a permit, set in the 1960s for 2,000 AUMs based on production at the time of 1.56 million pounds of forage, that same permit for 2,000 AUMs removes 2.8 million pounds of forage, nearly twice as much. Yet the BLM has never examined this critical issue. The AMS, EIS and DRMP are completely silent on this foundational problem. Please see attached review of this issue.	GRAZ01-General, DATA02-Inadequate Methodologies	The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined in the Livestock Grazing section. Livestock management can be adjusted as necessary to meet these objectives for rangeland health.
14767-6	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Greasewood - In CANY, 75 percent of samples are in biocrust-dominated states, whereas the 12.5 percent each of samples belonged to the shrub-bare state and the annualized state. On the Dugout Ranch, no samples belonged to the biocrust state. 40 percent and 60 percent are in the shrub-bare and annualized state, respectively. This is an example of the stark contrast between recovering lands in CANY and the continually degraded lands on the Monument. No honest person could shrug this off as acceptable degradation even on multiple use BLM lands, let alone NLCS lands mandated for protection and recovery. Blackbrush - Distribution of putative states: The portfolios of CANY and the Dugout Ranch starkly contrast. In CANY, 86 percent of samples are in biocrust-dominated states, whereas the remainder is examples of the shrub-bare state. On the Dugout Ranch, about 83 percent of sites are representative of the shrub-bare, and 17 percent represent the biocrust state. Juniper Blackbrush - In CANY, 88 percent of samples are in biocrust dominated shrubland-woodland states. Another 12 percent are in the invaded state. The Dugout Ranch samples are exclusively in the shrub-bare state. Grasslands - states: In CANY, 43 percent of samples are in grass-bare states. Another 36 percent are in biocrust states, and 21 percent in persistent annualized states. The Dugout Ranch is dominated even more extensively by grass-bare states, at 71 percent. Another 25 percent are annualized, and only 5 percent exist in a biocrust state. Cluster 5 occurs exclusively outside of CANY in currently grazed pastures. It is considerably different from cluster 6 in that total plant cover is about two thirds less, possibly due to recent grazing. This cluster lacks palatable shrubs entirely. Canyonlands National Park attained higher scores and more favorable portfolios of ecosystem state distribution than the Dugout Ranch in most of the ecosystem services and properties considered. The contrast is most obvious in a map of C-storage P-score results, wherein the CANY boundary signifies a profound shift in values (fig. 8). Grazing not only consumes forage directly, but consumption diminishes buildup of organic residues, and disrupts the photosynthetic biocrust on the soil surface which is also C-rich (Warren and Eldridge 2003). We provide a highlighted copy for you complete review.	GRAZ01-General, DATA02-Inadequate Methodologies	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
14767-68	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Utilization limits (harvest coefficient) that meets all the requirements discussed in the section regarding NLCS Policy as well as the physiological needs of the vegetation, while allowing for BSC to recover and fully play its ecological role, must also be factored in. NLCS prioritization of resource protection over resource extraction has to be addressed in utilization limits. The EIS and DRMP completely failed to do this.	GRAZ01-General, DATA02-Inadequate Methodologies	The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined in the Livestock Grazing section. Livestock management can be adjusted as necessary to meet these objectives for rangeland health.
14767-8	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	All discretionary uses must be examined under the protection and recovery mandate based on current science and data. This process needs to exclude range cons as they have no expertise in this field and they feel it is their mandate to protect the livestock industry. The EIS utterly failed to examine discretionary uses (i.e. livestock grazing, etc) under the protection and recovery mandate.	GRAZ01-General, DATA02-Inadequate Methodologies	See Chapter 3 for the impacts of livestock grazing on all resources and uses of the Monument.
17963-4	Sierra Nelson		Legal Issues with Retiring Grazing Allotments Permanently retiring grazing allotments violates federal law unless an environmental analysis shows the lands are no longer primarily valuable for grazing. The DRMP lacks such analysis, making the proposed retirements illegal.	GRAZ01-General, DATA02-Inadequate Methodologies	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan does not alter currently allocated AUMs as outlined in Chapter 2 Livestock Grazing. Any reductions that are determined to be necessary due to the reduction of acres available to grazing would be done at the implementation planning level. The retirement of lands subject to a voluntarily relinquished livestock grazing permit or lease is required by Presidential Proclamation 10285.
18082-36	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	One page 3-354 of the Social and Economic Values analysis, it states that there are 26 permittees whose livestock grazing operations use BENM lands. To understand the nature and magnitude the proposed alternatives would have on the Tribes, we recommend the Final EIS identify the Tribe(s) that graze on the Monument, and how many permits, permitted acres, and AUMs the Tribes hold. The EPA also recommends discussing whether and to what extent each alternative would affect Tribal members grazing interests within the planning area.	GRAZ01-General, DATA02-Inadequate Methodologies	Individual grazing permittee information, includes the Tribes, is not necessary for analysis of the Proposed Plan.
18112-22	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	While the plan speaks to potential effects on grazing (harming ranchers), it does not provide stakeholders with information in terms that the ranchers and the regulators both use, such as allotment numbers. How can the Bureau expect substantive comments on the effects on ranching when the affected population cannot discern whether the proposed changes will affect them? In the proposal, for example, the Bureau acknowledges, All alternatives would have an impact to water developments and range improvements, with Alternative A having the least impact and allowing for the most new improvements and developments, whereas Alternatives D and E restrict them and include the potential to remove existing improvements and developments, except where they help protect BENM objects. Draft Plan ES-28. But where? On which grazing allotments? As a starting point,	GRAZ01-General, DATA02-Inadequate Methodologies	A map of allotments will be added into Appendix N, in the Livestock Grazing section. There is also a list of specific pastures in the Management Actions by Alternative in the Livestock Grazing section. Entire allotments would not be made unavailable or retired under the Proposed Plan, yet specific areas and/or pastures within an allotment are made unavailable.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			each alternative other than the status quo will reduce the land purportedly available/suitable for grazing. See Draft Plan 2-125, at Table 2-21. But which allotments would be deemed unavailable or retired under each alternative? Where are they? The Bureau knows that grazing is managed by allotment names and numbers. And the Bureau has catalogued allotments by name. Draft Plan 3-4463-448, at Table 3-140. But how is Blanding City or any given rancher supposed to figure out whether his/her allotment will no longer be available/suitable? The Bureau does not say. Instead, the Bureau describes expected dramatic losses of animal unit months and head months generally attributable to the entire planning area. E.g., Draft Plan 2-131. Are Blanding City and its constituents supposed to guess where those losses of their incomes, tax bases, and ways of life will take place? Further, without more detail, how can the public read the draft plan and trust that the Bureau conducted a proper analysis between the competing alternatives? If the Bureau is just guessing, then it is not taking an honest hard look at the consequences of its actions. See Wyoming v. U.S. Dept of Agric., 661 F.3d 1209, 1264 (10th Cir. 2011). If the Bureau is keeping information from the public, then it is being unreasonable. See New Mexico ex rel. Richardson, 565 F.3d at 703. Either the Bureau does not actually know where it will newly designate land unavailable/unsuitable for grazing, or it is withholding that information from the public. But in NEPA, Congress demands more transparency than that, and persisting in this way would require setting the proposed revisions aside. See 5 U.S.C. 706(2).		
43-1	Not happy with BLM		This DEIS under estimates the threat that further grazing poses to monument objects. For example, livestock are the main cause for the expansion of cheatgrass. Cheatgrass changes fuel patterns and facilitates more severe fires. These fires convert ecosystems into sterile monocultures of annual grass. This jeopardizes the monument landscape and its objects. But the DEIS has no alternative to respond to this jeopardy at the proper scale.	GRAZ01-General, DATA02-Inadequate Methodologies	See Proposed Plan in the Livestock Grazing section, which includes the following: "Manage grazing to minimize or eliminate intrusion of invasive grass and plant species due to grazing-related activities."
14767-105	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We also provide the classic Mack and Thompson, 1982 paper.	GRAZ01-General, DATA03-Suggest Additional Data Source	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
14767-111	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In scoping, we suggested you review basic range science such as the Holechek Range Management Principles and Practice textbook. You did not, so we are having to again refer you to this primary range science textbook. Selection of the correct stocking rate is the most important of all grazing management decisions from the standpoint of vegetation, livestock, wildlife, and economic return. Rather than focusing so much on rotation grazing systems and trying to maximize forage harvest efficiency, we believe public rangeland managers and ranchers should place greater emphasis on keeping animal numbers in balance with forage supplies The critical aspects of range management in desert areas are to keep livestock in balance with forage supplies	GRAZ01-General, DATA03-Suggest Additional Data Source	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. All BLM permits include the following stipulation: Grazing management practices will comply with Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah (1997) which include the following: "Maintain sufficient residual vegetation and litter on both upland and riparian sites to protect the soil from wind and water erosion and support ecological functions."
14767-112	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	This primary range science textbook sums up current science regarding utilization rates when it states: Conventional wisdom has been that moderate stocking involves 50 percent use of forage (Table 8.2). This guideline applies well in the southern pine forests, humid grasslands, and annual grasslands but results in rangeland deterioration in coniferous forest rangelands (pg. 140 of Holechek et al. 2011). The general guideline of take half and leave half of the current season's growth recommended by early range managers appears applicable only to humid and annual grassland ranges. Holechek 1988 Rangelands 10(1) The textbooks review of the literature found that Troxel and White, 1989, Lacey et al, 1994, Johnson et al, 1996, White and McGinty, 1997 as well as USDA NRCS, 1997 all recommend stocking based on allocation of 25% of the current year forage to livestock, and another 25% to natural disappearance (insects, wildlife, weathering) with 50% left for site protection. The approach developed by Holechek (1988) is based on maximizing forage by livestock, while Troxel and While (1989) works well for range betterment and minimization of risk. Id at 157. The textbook concludes that use of a harvest coefficient higher than 25% invariably leads to land degradation. Id at 157. Galt et al, 2000 in Rangelands 22(6) echoes the foundational importance of proper stocking rates We increasingly hold the opinion that a 25% harvest coefficient is a sound idea for most western rangelands. After careful analysis of their own and existing research, Johnston et al. recommended a 25% harvest coefficient for Australian rangelands. It allows both forage species and livestock to maximize their productivity, allows for error in forage production estimates, greatly reduces problems from buying and selling livestock, reduces the risk of financial ruin during drought years, and promotes multiple use values. The above discussion is based on livestock production maximization considerations and do not factor in regulatory requirements, such as 43 CFR 4180 compliance, NLCS requirements or the requirements to prioritize the protection and recovery of Monument values.	GRAZ01-General, DATA03-Suggest Additional Data Source	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. The determination of current forage capacity and associated AUMs are determined at the site-specific implementation level, typically when the grazing permit is fully processed and renewed. Routine monitoring of the rangelands includes range utilization of key plant species that would indicate if areas are being over-utilized, under-utilized, and/or utilized at desired rates to meet the goals and objectives of this plan outlined in the Livestock Grazing section. Livestock management can be adjusted as necessary to meet these objectives for rangeland health. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Monitoring will include collection of utilization data, and management actions could include reducing utilization levels for livestock when utilization thresholds are reached. As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines. Utilization levels would take forage needs of wildlife into consideration.

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14767-3	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	A few years back the USGS issued a report on a study comparing the Indian Creek allotment with the adjacent Canyonlands National Park which has been recovering from the same abusive livestock grazing practices for 40-50 years. While Canyonlands is far from recovered from its century of livestock abuse, the comparison is stark. This study and many others must be kept in mind when your range cons advocate for continuing the status quo in their unwavering dedication to the livestock industry.	GRAZ01-General, DATA03-Suggest Additional Data Source	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.
14767-69	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	While the BLM is a multiple-use agency but the BLM lands under NLCS are not, we provide examples of capability analysis processes by both R4 and R2. Of course, these fail to factor in issues other than production, slope, soils and distance from water. We provided a science-based process for this process in Catlin et al. 2003. This provides a good structure to bring in protection and recovery of Monument objects, but does not directly address FLPMA Section 302 (a), The Omnibus Public Lands Act of 2009 or all the specific NLCS requirements that the agency has written to govern itself. While Catlin et al. provides some information regarding utilization rates, we request that you review Range Management Principles and Practice, which is the primary range management textbook. While the textbook is for livestock management maximization (not NLCS requirements). This textbook recommends a maximum utilization rate of 25% and summarizes the literature by stating use of a harvest coefficient higher than 25% invariably leads to land degradation. Holecheks review of current range science is based on a multiple use perspective and does not deal with NLCS requirements that go well beyond the low bar of multiple use.	GRAZ01-General, DATA03-Suggest Additional Data Source	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. As outlined in the Management Actions by Alternative in the Livestock Grazing section, the Proposed Plan outlines utilization levels of key forage species would be identified on an allotment-specific basis. Utilization levels would be managed to meet the goals and objectives in this plan and implementation plans, as applicable. Utilization levels would be established within 2 years of the release of this RMP/EIS assessing appropriate utilization levels and baselines. Utilization levels would take forage needs of wildlife into consideration and are monitored. The agencies complied with all applicable Federal Law and regulation in developing the RMP/EIS. See Appendix B for a list of the relevant laws, regulations, policies, and plans considered in the development of the RMP/EIS and for which the EIS is compliant.
14767-7	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The attached Hole in the Rock Well archi report from Glen Canyon does an important job at understanding the impacts of livestock grazing on archi resources. After the permittee, with the support of the BLM, illegally drilled a well on NPS lands, the NPS undertook a review of the impacts on its archi resources. It showed major impacts to archi resources out to 3 miles. The report concluded: The effects of cattle grazing are anathema to the archeological record. Although it may not be politically possible to permanently withdraw the Soda Allotment from grazing, not doing so is a death warrant for scientific study and preservation of its archeological record. We see the mention of protection of historical resources. This is one of the values to be protected under the Proclamation. Again the primary source of impacts to archeological resources is the direct and indirect impacts of the discretionary authorization of livestock grazing. Where a use impacts a protected value, that discretionary use must give way to the primary purpose of the unit, the protection of the values and resources within the establishing document. This is not opinion. It is the demand of FLPMA Section 302 (a), the Omnibus Public Lands Act, the Secretarial Order and the various NLCS directives. Further, every and all impacts to cultural resources are, by definition, cumulative and permanent.	GRAZ01-General, DATA03-Suggest Additional Data Source	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. See Chapter 3 for a discussion of impacts to cultural resources from livestock grazing.
18238-71	Chaitna Sinha		We propose that a modified polygon be adopted as the Indian Creek - Lower area and be allocated as unavailable for grazing in the final plan. This area is included in Alternative B, and our understanding is that this area was identified as not currently being grazed. We visited this area and found that a fence and natural topography prevent cattle from grazing a larger area than what is encompassed in the polygon included in the DEIS GIS data. We observed no evidence of cattle use in this larger area, such as recent or old cowpies. Thus, we are submitting a shapefile that includes a modified polygon of this area that encompasses the larger currently ungrazed area. This shapefile includes associated metadata that explain the modifications based on our observations.	GRAZ01-General, DATA03-Suggest Additional Data Source, ALTO5-Alternative E	Thank you for your comment. See changes to the Proposed Plan in the livestock grazing section. The BLM proposes to make part of lower Indian Creek unavailable to grazing.
18994-4	Redge Johnson (please contact PLPCO's archaeologist, Kristopher Carambelas)		The draft document utterly ignores the importance of traditional livestock grazing within the monument. The agencies should acknowledge this important cultural practice and based on published evidence and historical documents submitted by residents, formally determine a livestock grazing TCP within the BENM. The agencies should then reanalyze how the proposed alternatives may affect this TCP, because, from PLPCO's perspective, many of the alternatives will result in adverse effects. To engender further frustration among non-Indigenous people, the draft EIS/RMP fails to acknowledge how livestock grazing specifically, and the lands upon which this culturally significant practice is conducted must be considered under existing laws, regulations, and policies. The agencies are obligated to comply with 54 U.S.C. SS306108 by following the Section 106 Process (36 C.F.R. SS800 Subpart B) using agency guidance. PLPCO, as a consulting party to this undertaking, previously asserted its knowledge of, and concerns with, the traditional cultural and economic practice of grazing in the BENM.4 Specifically, our office argued that the practice of livestock grazing on allotments within the monument comprises a Traditional Cultural Property (TCP) that is eligible for National Register inclusion because of its "association with cultural practices [and] beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community".5 This TCP is significant, minimally, because it maintains aspects of integrity that are critical to conveying significance, especially location, setting, feeling, 6 and is "associated with events that have made a significant contribution to the broad patterns of [local] history".7 Further research may reveal that the TCP is associated with the lives of persons significant in the past8 and possesses aspects of design, materials, and workmanship. No one can argue that livestock grazing does not have deep, historical roots in the BENM.9 Even Proclamation 10285 states that "Elk Ridge also has a long history of livestock grazing by Navajo and	GRAZ01-General, DECIO2-Section 106 Consultation	The State has failed to provide the agencies with sufficient information to begin evaluating lands used for livestock grazing as a TCP. The State has provided no delineated tangible area or property to be evaluated as a TCP. Accordingly, the agencies are not able to evaluate livestock grazing as a TCP in accordance with Section 106 at this time. Further, the State's comments make references to multiple groups but does not identify a single community or group that are associated with, and value the traditional practice of grazing (see <i>National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties</i>). However, even if the State had provided sufficient information to begin evaluating lands for livestock grazing as a TCP, the Proposed Plan would not result in adverse effects to livestock grazing practices; approximately 97% acres of grazing currently available for grazing would remain available to grazing, and would not alter currently allocated AUMs. This highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			Ute families and later Anglo settlers". Similarly, livestock grazing within BENM is important in maintaining the continuing cultural identity of the community. The descendants of Mormon pioneers, for example, are bound to agree with Robert S. McPherson's statement that the Latter-day Saint mission to San Juan in the late 1800s "framed the character and grit of those early settlers, enshrined the importance of the San Juan mission in their hearts, and proved their stalwart ability to see a task through to its end". Today, many living descendants still believe that the San Juan mission is an ongoing task, that character and grit are essential traits of the cultural identity, and that livestock grazing in BENM is a vital economic and cultural practice that makes these things possible. These letters, along with others that were undoubtedly submitted during the draft comment period, unequivocally establish a livestock grazing TCP within the BENM. The agencies should recognize this TCP with a formal determination of National Register eligibility. As a TCP, the agencies must assess how the RMP's alternatives "may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association".¹³ And if there is an adverse effect, which will almost certainly be the case under Alternatives B through E, then the agencies must engage in consultation to avoid, minimize, or mitigate adverse effects. For instance, the mandate to retire grazing lands¹⁴ would have an adverse effect on the TCP because it would, at least, change the character of the property's use. Grazing land retirement would also lead to neglect, which would further diminish critical aspects of integrity. As the agencies prefer to avoid adverse effects, it behooves them to keep these allotments open to grazing and find permittees who desire to continue this traditional economic and cultural practice.		
15381-20	Sagebrush Habitat Conservation Fund		There is a lack of quantification as to the current and projected impact of livestock grazing on water quality, cultural resources, biological soil crusts, let alone rangeland health and species diversity. This plan makes assertions to abide by Standards for Rangeland Health when less than half the planning area has ever been assessed for those standards. The allotments that BLM has assessed are not addressed and quantified. Over half the assessments are dated, having been done 14 or more years ago. What we are left with are the same old, unkept promises BLM has been making for the past 40 years unspecified monitoring focused on dominant livestock forage plants, and adaptive management. Our experience is that the monitoring is inadequate if it is done at all, and there is seldom if ever management action addressing obvious resource damage. This document promises more unspecified monitoring, plus nebulous Indigenous Traditional Knowledge, with no firm management direction or commitment. It is difficult to assess the impacts of the various alternatives when those alternatives consist of varying degrees of stated good intentions in future actions rather than direct management action.	GRAZ01-General, DECI04-Mitigation and Monitoring	The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewals will be guided by current land health evaluations. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. As stated in Chapter 3, Traditional Indigenous Knowledge is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives. Traditional Ecological Knowledge and Traditional Indigenous Knowledge are defined in the Glossary.
9524-4	379 Ridge View Drive Grand Junction, CO 81507Sherry Schenk		Livestock grazing across the Bears Ears National Monument needs to be done in such a manner that the lands will meet land health and optimum forage assessment standards. Those standards must be measured on a consistent schedule using the best scientific knowledge so that the land health is maintained at an optimum level across the Monument.	GRAZ01-General, DECI04-Mitigation and Monitoring, ALT07-Modification of Existing Alternatives	In the Management Actions by Alternative in the Livestock Grazing section, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewal EAs will be guided by current land health evaluations. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards. Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
17969-4	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	TNC hopes to finalize another cooperative agreement with the BLM in July 2024 to demonstrate how improved management models that incorporate flexibility with accountability into livestock grazing systems can provide better benefits to people and nature. The demonstration project ranches, including Dugout Ranch, all have public grazing allotments and permits, covering the diversity of western landscapes with the scale, topography, and remoteness that typify the opportunity and the challenge of the BLMs management. Working with local BLM staff, TNC will show how existing rules and regulations can provide more flexible and accountable livestock grazing systems, while also suggesting how those policies can be improved to make such systems affordable and accessible to producers across the biome. TNC will use both traditional and novel livestock management tools, such as virtual fencing technology. This technology includes the creation of publicly- and privately-owned infrastructure networks that provide coverage across large landscapes to allow for more flexible and accountable livestock management. TNC recommends that the proposed RMP/Final EIS accommodate and allow this effort to ensure TNC can fulfill obligations in the anticipated BLM cooperative agreement. We provide specific recommendations on this in the Livestock Grazing and Visual Resources sections below.	GRAZ01-General, DECI05-Cooperating Agency Relationships, ALT07-Modification of Existing Alternatives	The plan does not restrict development of cooperative agreements. Any actions must allow for the protection of BENM objects.

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18994-5	Redge Johnson (please contact PLCPO's archaeologist, Kristopher Carambelas)		Despite intentional or surreptitious efforts to mislead the public into believing that the traditional cultural practice of livestock grazing, and the lands on which this practice occurs, are somehow protected by the monument designation, most members of the livestock grazing community now know that such protections do not exist. Furthermore, many people also know that the draft EIS/RMP fails to recognize that existing laws, rules, and regulations potentially offer protections for these important cultural resources. Imagine the frustration non-Indigenous people feel when they learn that the agencies have not been forthright with them about cultural resource protections, and then learn that the draft EIS/RMP gives less respect, dignity, and protections to their heritage when compared to the heritage of the area's Indigenous people. Concerning misinformation, consider the BENM Plan Fact Sheet released on March 8, 2024.2 Anyone who has not carefully read Proclamation 10285 may be tempted to believe that the traditional cultural practice of livestock grazing is a historic object protected by the monument because the "proclamation notes other important uses in the area, including grazing ...". Additionally, at a public meeting held at the Blanding City Office on May 9, 2024, District Ranger Michael Engelhart responded to a question about the historical importance of grazing by stating that "the proclamation refers to historical grazing several times." Again, this statement may have led some people to believe that the monument designation protects this important historical practice. However, what the Fact Sheet and Ranger Englehart's response fail to mention is that "historic grazing" is explicitly excluded from monument protections.3	GRAZO1-General, DECI07-Compliance with other laws and policies	While livestock grazing is a use noted in Proclamation 10285 and Proclamation 9558, livestock grazing is not an object of historic and scientific interest designated for protection. However, the Proclamation does identify certain objects associated with grazing that are protected by the Proposed Plan, such as historic signatures. The proclamation states that grazing is a historical use by indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details.
14767-209	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.4.2.3: Under Alternative A, 1,223,820 acres would be available for grazing (90% of the total acreage). In these areas, vegetation would continue to be impacted by grazing as described in Section 3.4.4.5.2. In 3.4.5.1: Controlling undesirable and nonnative species is one of the most difficult challenges, as well as one of the most significant problems, facing vegetation managers. We have known for decades what promotes the spread of invasives, any soil disturbance. What is, by far, the largest cause of soil disturbance and spread of invasives. Livestock grazing. Yet despite these facts, the BLM refuses do anything to about this cause of the problem they say is one of the most significant problems they face. Grazing can also increase susceptibility for the introduction and spread of noxious and invasive plants by degrading the native grass community and creating ground disturbance from the livestock themselves and from maintenance of associated infrastructure. As described in Affected Environment, grazing is associated with decreased BSC and perennial grass cover and corresponding increases in invasive annual grasses (Duniway et al. 2018). Livestock movement and associated activities, such as the transport of contaminated hay, can also introduce noxious and invasive plants into new locations. However, all alternatives include management direction to mitigate the risks of these impacts and to emphasize sustainable, healthy rangelands with respect to grazing practices. Does authorizing the very activity that is most at fault for invasive spread complying with the BLMs protect and restore mandate? Of course not. But all the alternatives maintain the status quo for livestock grazing.	GRAZO1-General, DECI07-Compliance with other laws and policies	See Chapter 3 of the RMP/EIS for data used to analyze the impacts of proposed management on the resources contained in the Monument. As outlined in Management Actions Common To All Alternatives in the Livestock Grazing section, livestock grazing will be implemented to meet the standards for rangeland health in a manner that is consistent with the protection of BENM objects, which include invasive species as an indicator. In addition, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts.
14767-210	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.5.1.2.1, the BLM states: Management actions that limit surface disturbance, such as those associated with water, soil, vegetation, and visual resources, would limit associated impacts to cultural resources. Conversely, management actions that allow surface disturbance, such as livestock grazing or granting of a ROW, would potentially subject cultural resources to impacts, although such impacts would be addressed at a project-specific implementation level. Management actions related to recreation, tourism, OHV use, and grazing have the greatest potential to affect cultural resources. Livestock grazing would continue under all alternatives. Grazing can impact archaeological sites through surface trampling, livestock wallowing, and establishment of livestock trails through sites. Under each management alternative, allowable grazing activity areas are established, each of which could differentially affect the potential impact of grazing to archaeological sites. In general, where grazing is made available there is greater potential impact to archaeological sites than in areas where grazing activity is limited or prohibited. Firstly, as is obvious, cultural resources is an object that is required to be protected. As discussed earlier, all impacts to cultural resources, by definition, are cumulative and permanent. Yet here, the BLM admits that it is prioritizing discretionary uses like livestock grazing which it knows will degrad and destroy objects, over its protect and restore mandate. It is as if the BLM refuses to abandon its multiple use mindset in contradiction to the legal requirements of FLPMA 302 (a), The Omnibus Public Lands Management Act of 2009, the applicable Secretarial Order and the entire NLCS set of directives.	GRAZO1-General, DECI07-Compliance with other laws and policies	Cultural resources would be inventoried at the project and implementation level for site-specific grazing actions. If cultural resources have the potential to be adversely impact by the action, appropriate mitigation measures would be implemented. Management Actions Common To All Alternatives in the Livestock Grazing section outlines if monitoring indicates that domestic livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts in a manner that ensures protection of BENM objects.
14767-33	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Appendix C of the Handbook provides the heart of the planning process. Given its importance to complying with FLPMA, we are providing it, with highlights, in its entirety in our comments. Of particular importance to grazing are Section I Subsections B, C, D, F, G and Section II Subsection B. Reading the EIS and DRMP it appears that either the BLM failed to read/understand its own planning handbook or chose to ignore it as inconvenient. Neither case is appropriate behavior for public servants.	GRAZO1-General, DECI07-Compliance with other laws and policies	The agencies followed the BLM's Planning Policy Handbook for the BENM RMP/EIS. The Proposed Plan identifies lands available, or not available, for livestock grazing, as provided in the handbook. The Proposed Plan outlines a plan for designating forage on an allotment level. See the Management Actions by Alternative in the Livestock Grazing section of the Proposed Plan for management actions regarding livestock grazing.
14767-48	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The RMP amendment must include timelines and priorities for the completion and review of progress of the Fundamentals of Rangeland Health Standards and Guidelines assessments and determinations as required under the 4180 regulations. The current DRMP completely ignored the impact of the agencies addiction to FLPMA 402c2. Everything in the very short range section of the	GRAZO1-General, DECI07-Compliance with other laws and policies	In the Management Actions by Alternative in the Livestock Grazing section the Proposed Plan identifies 6 priority allotments for which the BLM will complete land health assessments, and, if needed, causal factor determinations. The BLM will then complete appropriate NEPA and Section 106 compliance and consultation to renew such permits.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			DRMP is only triggered, under the best case scenario during range permit NEPA which no longer happens. Simply creating a listing of allotments, a 20 minute process, does nothing. Its typical of the agency's plan to plan, its promised to consult, assess, analyze and the like, none of which actually do anything. For further details on the implementation of the 4180 regulations, we previously requested that the BLM review its 1/19/01 Manual Transmittal Sheet for H-4180-1 Rangeland Health Standards. We, again, specifically bring the BLMs attention to its duties to make significant progress towards meeting Standards and Guidelines. The RMP failed to provide direction to achieve the Fundamentals of Rangeland Health and the Standards and Guidelines, and in those situations, of which there are many, where these are not being met, the RMP failed to provide sufficient direction that results in the required significant progress. Again, the BLM utterly ignored its own requirements, even though these form the foundation of the task and even if the BLM was unaware of its own obviously applicable requirements, we provided them in detail during scoping.		
17195-6	Terry Camp 9865 State St. Sandy, UT 84070	Utah Farm Bureau Federation	The UFBF also believes that permanently retiring grazing allotments within BENM violates current federal law. Under the Grazing Retirement Clause in the most recent Proclamation, President Biden directed the Secretaries to retire grazing permits or leases if voluntarily relinquished by the existing holder. The same Proclamation, however, states that the Secretaries shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations President Bidens proclamation conflicts with existing federal law which does not allow for the permanent retirement of grazing allotments unless a detailed environmental analysis shows that those lands are no longer chiefly valuable for grazing. In 1934, the Taylor Grazing Act divided most of the western United States into Taylor Grazing Districts. To be included in a Taylor Grazing District, the Secretary of the Interior makes a determination if lands are chiefly valuable for grazing which establishes that grazing is the primary use of those lands. As the majority of BENM is located within Utah TGA District 6, the Secretary of the Interior determined that most of the area which is now BENM is chiefly valuable for grazing. ⁹ The DRMP does not complete an environmental analysis for any of the allotments that could become unavailable under the current DRMP. Therefore, the permanent retirement of allotments violates existing federal law and should be prohibited.	GRAZ01-General, DECIO7-Compliance with other laws and policies	The Proposed Plan does not effectuate or reflect any permanent retirements as a result of voluntary relinquishments, nor permanently retires any grazing allotments (yet portions may be made unavailable or restricted to trailing only). The retirement of lands subject to a voluntarily relinquished livestock grazing permit or lease is required by Presidential Proclamation 10285.
17573-51	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The States prior comments also noted that while the Grazing Retirement Clause ³⁶ found in the Bears Ears Proclamation directs the Secretary to retire grazing permits/leases if voluntarily relinquished by the existing holder, the same Proclamation also states that the Secretary shall manage livestock grazing in accordance with existing laws and regulations ³⁷ The Grazing Retirement Clause is extremely concerning to the State, and the State opposes any land use planning decisions based on this clause. Further, current federal law does not allow for the permanent retirement of grazing allotments unless a detailed environmental analysis shows that those lands are not chiefly suitable for grazing. Such an analysis has not been done here for any allotments. As such, the retirement of grazing allotments violates existing state and federal laws and regulations, and as such, should not be allowed.	GRAZ01-General, DECIO7-Compliance with other laws and policies	The Proposed Plan's direction concerning voluntary relinquishment is consistent with Proclamation 10285.
17573-57	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	In its prior comment letters, the State provided an in-depth, and lengthy analysis of grazing within the BENM, as well as its various and specific concerns regarding the Draft Alternatives put forth by the Agencies, which are now solidified in the DRMP/EIS. These concepts are not consistent with the States SRMP which extensively protects grazing opportunities on public lands in accordance with State law. The States SRMP states that grazing AUMs should remain at or above current levels unless a scientific need for temporary reduction is demonstrated. ⁵⁰ Here, the Agencies decided to reduce AUMs not following a comprehensive rangeland health analysis, but because the agencies received pressure from within and without the Agencies to show a reduction in AUMs.	GRAZ01-General, DECIO7-Compliance with other laws and policies	The Proposed Plan would not alter currently allocated AUMs as outlined in the Management Actions by Alternative in the Livestock Grazing section. Modifications to AUMs would be done at the site-specific implementation level planning process, consistent with Federal law, regulation and policy using the best available science, and after the permit or lease is voluntarily relinquished. Under the Proposed Plan, the agencies would develop and implement Allotment Management Plans in order to further manage livestock grazing.
17630-2	Brent Tanner		Livestock grazing is a permitted and legally recognized use of the reviewed area. The suggestion of permanently retiring grazing violates existing law. The Taylor Grazing Act provides for lands to be designated as chiefly valuable for grazing. Much of the monument falls within areas that have received that designation. Any alteration from that designation should require significant NEPA and other congressionally required review processes.	GRAZ01-General, DECIO7-Compliance with other laws and policies	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan would not alter currently allocated AUMs as outlined in the Livestock Grazing section. Any reductions that are determined to be necessary due to the reduction of acres available to grazing would be done at the implementation planning level. The retirement of lands subject to a voluntarily relinquished livestock grazing permit or lease is required by Presidential Proclamation 10285.
688-2	Cory Codner		The native Americans need more grazing permits cause each tribe gets a certain number of cows so dark canyon would be helpful if allowed to run cows if the Native Americans can run cattle in the bears ears that would benefit the Native Americans.	GRAZ01-General, EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	The BLM-managed portion of Dark Canyon is unavailable to grazing in the Proposed Plan. The USDA Forest Service manages portions of Dark Canyon that are already grazed. Applications for grazing permits are considered on a case by case basis outside of this planning effort.
9100-2	David Robinson		This allotment has roads on it that are essential to our cattle in order to maintain and operate our ranch. Some of the roads go to vital water locations for the cattle such as a water well and reservoir. If this part of the Bear's Ears allotment is closed to cattle and we are unable to graze this location, it will mean the end of my ranching operation and way of life.	GRAZ01-General, EJSOC03-Local Economy (jobs, grazing, visitation, etc.)	Impacts on economic conditions from changes in grazing, such as changes in jobs and income, and impacts on social conditions from changes in grazing, such as changes in culture and way-of-life, are discussed in Chapter 3. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section makes some additional acres unavailable for grazing, however none of these are on the Harts Point allotment.

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15381-11	Sagebrush Habitat Conservation Fund		Impacts to vegetation from livestock for each alternative (Terrestrial Vegetation discussion continued) For alternative A it states impacts of livestock grazing could continue. Alternative B indicates livestock grazing impacts would continue to have a neutral impact. Which is it? Under Alternatives C, D, and E there are no impacts to terrestrial vegetation, neutral or otherwise beyond the areas declared unsuitable/unavailable. The only meaningful management changes in grazing are the areas unavailable/unsuitable. For the areas that are available for livestock grazing, grazing management is the same status quo grazing that has been occurring for the last 50 years. This is hardly a meaningful range of alternatives.	GRAZ01-General, HABVEG01-Vegetation	The analysis of Alternative A in Chapter 3 describes impacts from grazing under current management conditions which would continue if Alternative A were selected. Language was added to the Vegetation section. The Proposed Plan Has multiple different management actions related to grazing, compared to current management See the Management Actions by Alternative in the Livestock Grazing section of the Proposed Plan. For example, the Proposed Plan only allows for range improvements in order to protect Monument objects.
17950-1	Mark Franklin		Cattle grazing allotments must be phased out within Bears Ears National Monument as allowed under the enabling proclamation for the monument as signed by President Biden. Over the past century, cattle have damaged wildlife habitat, riparian areas, recreation resources, archeological and sacred sites, landscapes, ancient travel routes, traditional cultural properties, and cultural landscapes. Grazing must be discontinued on all allotments especially those that do not meet healthy rangeland conditions as identified by BLM. Vegetation in Comb Wash area provides little livestock forage, resulting in livestock concentrating in riparian areas. Unfortunately, cattle grazing has already impacted cultural landscapes. Ancient crops such as Indian rice grass is significantly declining as a result of current and historic overgrazing. Cattle grazing must be discontinued until these landscapes are restored to Ancient landscape conditions and rice grass is returned as the primary cover. Constructed water reservoirs for cattle must not be allowed within Bears Ears National Monument. In addition, existing water reservoirs must be dismantled and landscapes re-vegetated with native brush and rice grass. Pasture fences, drift fences, corrals, and abandoned infrastructure items associated with grazing must be removed by the permittee. (This includes culverts, feed troughs, molasses stations, barbed wire, irrigation pipes and PVC water lines.) Decades of casual enforcement of grazing allotments must come to an end. BLM must aggressively enforce public land health standards.	GRAZ01-General, HABVEG01-Vegetation	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The retirement of lands subject to a voluntarily relinquished livestock grazing permit or lease is required by Presidential Proclamation 10285. The Management Actions by Alternative in the Livestock Grazing section of the Proposed Plan explains that the agencies would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements. In The Livestock Grazing section under Chapter 2, under the Proposed Plan, within three years of the signing of a ROD for this planning effort, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. In addition, the Goals and Objectives in the Livestock Grazing section and Appendix G includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic/riparian functions.
17573-44	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The BENM resource management planning process continues to operate under the misplaced assumption that grazing infrastructure and other remnants of early European settlement are not objects of historic interest for which the monument was designated. Proclamation 10285 does recite President Obamas proclamation language regarding historic grazing and outdoor recreation and describes them as not being objects of historic interest. However, proclamation 10285 then goes on to identify its grazing-related objects. Specifically, proclamation 10285 outlines the long history of livestock grazing by Navajo and Ute families and later Anglo settlers. It also mentions cabins used by cowboys in their work of running cattle in the area. Most interestingly, proclamation 10285 also describes the entire BENM landscape as convey[ing] westward expansion of European Americans and the settlement of Latter-day communities in southern Utah. Additionally, proclamation 10285 also references Hispanic sheepherders and their descendants who continue to live in local communities. These paragraphs dedicated to grazing and early settlement cultural resources create identifiable objects of historic interest to be protected under the proclamation if it is valid, and the Agencies have failed to sufficiently explain why they are not.	GRAZ01-General, HISTO01-General	While livestock grazing is a use noted in Proclamation 10285 and Proclamation 9558, historic grazing is not an object of historic and scientific interest designated for protection. However, the Proclamation does identify certain objects associated with grazing that are protected by the Proposed Plan, such as historic signatures. Potential impacts of the Proposed Plan on historic resources are discussed in the Historic Communities, Historical Resources section. The Proposed Plan includes management actions and goals to protect historic properties and sites associated with the historic period.
16784-23	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Table 2-21: Grazing, especially trampling by livestock and vehicular access to grazing areas can have a negative impact on paleontological resources near the surface. Alternatives that expand the area open to grazing or that increase its intensity are discouraged by SVP, and we prefer alternatives that reduce the acreage available for livestock grazing and/or alternatives that protect paleontological resources from the impacts of grazing. This is particularly true for areas with the Potential Fossil Yield Classification (PFYC) rating of 4 or 5, and SVP asks that any decision-making should be made in consultation with the agency's qualified paleontologists in the region.	GRAZ01-General, PALEOGE003-Paleo	The Proposed Plan does not increase the areas available for grazing. See the Management Actions by Alternative in the Livestock Grazing section for grazing availability and unavailability in BENM.
17573-70	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, Alternative D would manage the least acreage in PFYC Classes 4 and 5 as available to grazing, reducing potential impacts to paleontological resources from grazing. However, this is not necessary as there is no scientific data to indicate that grazing has harmful impacts on paleontological resources, and the alternatives built on this assumption are arbitrary and capricious because this faulty understanding cannot be used to justify obvious harm to grazing communities.	GRAZ01-General, PALEOGE003-Paleo	The Proposed Plan manages more acreage as available to grazing in PFYC 4 and 5 than Alternative D. See Chapter 3 for information regarding the effects of grazing on paleontological resources that are common to all alternatives, and the following subsections specific to the effects under each alternative.
18238-77	Chaitna Sinha		The Management Actions Common to All Alternatives section states that allotment management plans (AMPs) would be developed for all allotments during the scheduled permit renewal process, and that this would include analysis of the allotment. Id., p. 2-125. Alternative D states: Within 10 years of the signing of the ROD fully process all permit renewals across BENM Id., p. 2-129. Neither of these is explicit about what exactly analysis of the allotment or fully process all permit renewals means. We believe these both refer to completing NEPA analysis for allotments (i.e., not categorically excluding them from NEPA). This must be made explicit in the Final EIS for clarity as the plan is implemented. We propose that the final plan adopt the following language from Management Actions Common to All Alternatives with the following additions (in bold): . Develop and implement allotment management plans (AMPs) for all allotments within BENM during the scheduled permit renewal process and in collaboration with BEC. Development and implementation of AMPs will be conducted pursuant to NEPA, and include analysis of the allotment, including range improvements, and ensure consistency with protection of BENM objects. DEIS, p. 2-125. [see letter for emphasis]	GRAZ01-General, PUBL01-Public and Stakeholder Involvement, ALT05-Alternative E	The level of NEPA analysis required for implementation actions, including permit renewals, is determined on a case-by-case basis. The Proposed Plan includes prioritizing 6 allotments for the completion of NEPA within 6 years of the signing of a ROD for this planning effort. The BLM will continue to work to complete the 6 priority allotment reviews and reviews for the other allotments in BENM as fully processed permit renewals.

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14767-195	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Sensitive soils are generally more susceptible to ground-disturbing activities with amplified impacts from surface disturbance. BSCs are fragile and extremely susceptible to physical disruption from foot traffic, grazing, OHVs, and mechanized equipment, which destabilize surface soils. BSCs remain challenging to restore (Bowker 2007). All alternatives would seek to protect highly sensitive soils (i.e., soils highly susceptible to erosion) and BSCs. So again, the BLM admits that its not even attempting to comply with the protect and restore mandate. Then, the bald assertion that all alternative seek to protect BSC and sensitive soils. Well that statement is not borne out by the facts. The BLM states that 99% of the grazable acres9 in the Monument are sensitive soils, the EIS fails to even provide a map of the soils ratings overlaid by allotment boundaries. But even worse, none of the alternatives have requirements or limitations that would protect, let alone restore, BSC or protect (or restore sensitive soils from the impacts of livestock grazing.	GRAZ01-General, SOILS01-General	A map showing soil susceptibility ratings has been added to the RMP/EIS. The Goals and Objectives in the Livestock Grazing section and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
9296-4	John Carter PO Box 464 Bondurant, WY 82922	Yellowstone to Uintas Connection	Once the lands available for livestock grazing are identified and delineated on maps, the BLM Land Use Planning Manual (Appendix C II B p. 14) states: identify on an areawide basis both the amount of existing forage available for livestock (expressed in animal unit months) and the future anticipated amount of forage available for livestock with full implementation of the land use plan while maintaining a thriving natural ecological balance and multiple-use relationships. The Soil Survey (p. 174) states: The objective of range management is to manage all uses, including grazing, so that the plants growing on a site are about the same in kind and amount as the potential natural plant community for that site or a desired plant community, which is one of the sites potential vegetation states. Such management generally results in the optimum production of vegetation, control of undesirable plants, conservation of water, and control of erosion. These references illustrate the elements the RMP should be addressing in regard to determining suitability, stocking rates, and management for livestock grazing. We also dont see any analysis of the potential of these plant and soil communities. They should be dominated by soil crusts. What is needed is an analysis of long term livestock excluded areas such as Canyonlands National Park compared to conditions in BENM as well as analysis of soil survey data.	GRAZ01-General, SOILS02-Structure, Health, Function, and Preservation of Soil Resources, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, livestock grazing would be managed in a way that protects BENM objects. If monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. The Proposed Plan in the Livestock Grazing, Soil Resources, Water Resources, and vegetation sections include management actions for the protection of water resources, soils, and vegetation. The potential impacts of livestock grazing on soils, water and vegetation are found in Chapter 3.
1980-2	thea levkovitz		There are some improvements that could really make this Alternative E the gold standard for land management. 1) It needs to highlight the effect of livestock on the fragile cryptobiotic soils. The impact of these disturbed soils on climate change is well documented as the soil is carried on wind to the surrounding snow pack.	GRAZ01-General, SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs)), ALT05-Alternative E	Impacts to biological soil crust from livestock grazing is discussed in Chapter 3 of the RMP/EIS. The Goals and Objectives of the Livestock Grazing section and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.
14767-162	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The idea that TEK is an expert on livestock production is absurd. But beyond that, these are public lands. They are governed by an array of laws, regulations, directives and policies, all developed through legal processes under the laws of the United States. This TEK has not even been defined, let alone vetted through the processes required for implementation on our public lands. We dont even know what they are. They have no scientific examination. They have not been adopted under processes such as the Administrative Procedures Act. They have not undergone rule making. They have not gone through the processes necessary to even be agency policy or directives. The BLM, itself, doesnt know what TEK (or TIK) even is. Yet you are selling snake oil as the panacea to make livestock grazing consistent with protect and restore mandate. This obviously violates NEPA.	GRAZ01-General, TIK01-Traditional Ecological or Indigenous Knowledge	Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. TEK, just as Western Science, is simply a method for generating knowledge. It is important to note that the scientific method itself has not been subject to provisions of the Administrative Procedures Act nor has the scientific method undergone administrative rule making. As stated in Chapter 3, Traditional Indigenous Knowledge is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives. Traditional Ecological Knowledge and Traditional Indigenous Knowledge are defined in the Glossary.
9017-2			Current amounts of livestock grazing and OHV use should be greatly reduced.	GRAZ01-General, TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes additional acres on BLM made unavailable to grazing or limited to trailing only than is currently grazed. Under the Proposed Plan in the Transportation and Access section there are about 200,000 more acres in Ohv closed areas then currently.
15381-3	Sagebrush Habitat Conservation Fund		2.4.6.2. WATER RESOURCES MANAGEMENT ACTIONS. As throughout the document, we find the goals and objectives to be laudable, the actions cannot at shown to be effective at achieving those goals. The first three actions common to all alternatives are as follows: -Manage riparian and wetland resources for PFCs; manage water resources for quality and quantity. -Maintain and enhance water quantity and quality, the desired mix of vegetation types, structural stages, and landscape/riparian/watershed function to protect BENM objects. Conduct comprehensive monitoring to track water quality conditions. -Manage riparian areas to ensure stream channel morphology and functions are appropriate to the local soil type, climate, and landform. Ensure ecological diversity, stability, and sustainability, including maintaining the desired mix of vegetation types and structural stages. Provide for native and special status plant, fish, and wildlife habitats, and traditional, cultural, and ceremonial uses of water on BENM. These are written more as goal statements than management actions. Livestock grazing is a major change agent preventing the achievement of PFCs, and meeting water quality and quantity standards. Sadly, there are no management prescriptions presented for any alternative that address livestock impacts on water and riparian resources. Management actions instead are directed at recreational use and other direct human activities. Livestock grazing is not specifically mentioned. There is language in all alternatives modeled after the existing RMP stating: If monitoring determines that a permitted activity is a causal factor in riparian areas functional-at risk or nonfunctional, steps would be taken to mitigate the impacts of that activity or temporarily restrict the activity, or, if necessary, the riparian area would be closed to that activity to	GRAZ01-General, WAT01-General	The Proposed Plan in the Livestock Grazing and Water Resources sections include management actions for the protection of water resources. Under the Proposed Plan, in Chapter 2 it states: Prohibit new water developments and modifications to existing water developments for livestock grazing purposes, unless: The primary purpose is to protect or enhance BENM objects; and for BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			provide for restoration and maintenance of riparian area PFC. We are already there. There are water resources and riparian areas not meeting PFC or water quality standards. Why are we reliant on a future promise to do the right thing instead of taking positive action with this RMP?		
17969-8	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	TNC is concerned that certain aspects of Alternative E could inadvertently damage efforts to protect objects and resources of BENM. We believe limitations on new water development and the erection of facilities that could support virtual fencing, as currently described in Alternative E, could reduce the ability to control livestock within BENM. This would also disrupt the only studies of grazing impact and breed comparison now being conducted on the Colorado Plateau, which could be valuable in building resiliency for rangelands in BENM, the Colorado Plateau and Southwest region. Research at the CRC is being conducted in collaboration with the USDA-ARSs Jornada Experimental Range as part of USDAs Long Term Agroecosystem Research (LTAR) network. This research includes a study to determine if a heritage cattle breed, Rarmuri criollo, is better adapted to desert environments than breeds currently used by ranchers within BENM and on federal lands across the region; virtual fence technology as a precision ranching tool; and assessment of indicators that can better monitor soil and vegetation condition in response to current management. Each of these projects can contribute significantly to our understanding of sustainable land management to protect BENM resources and environments. The CRC is uniquely positioned to better address how current livestock use on the Colorado Plateau is interacting with drought and aridification, and how agencies such as the BLM and USFS as well as Tribes and other interested parties can best interpret monitoring data. The information generated from CRCs will be vital as we seek solutions for managing Colorado Plateau rangelands under future climates. TNC recommends the Proposed RMP/Final EIS does not prohibit new water development of springs and other water sources or the updating of existing water developments. The potential negative impacts of grazing are well documented, but they are not evenly distributed across the landscape. Within areas grazed by livestock, it is important to be able to restrict the duration cattle access places where there are sensitive soils, plant species or communities, and riparian areas. Fencing is the most common way to restrict cattle movement, but this is impractical for BENM because of the high cost of fence construction in such a vast landscape, and even more importantly because doing so could disturb the cultural or paleontological objects that BENM was designated to protect. Where physical fences are not appropriate, the best ways to influence cattle distribution are through the manipulation of water sources to draw livestock away from sensitive resources or to use virtual fencing that uses GPS technology to discourage cattle from entering environmentally sensitive areas. As currently written, the draft plan appears to make these preventive measures difficult if not impossible to implement. While seep and spring developments will be designed and constructed to protect ecological resources and functions and improve livestock and wildlife distribution (Appendix G, section 1.5), the plan guidance for livestock grazing (section 2.4.22.3) would [p]rohibit new water source development for domestic livestock unless necessary to protect BENM objects. If this restriction refers only to cultural and paleontological objects as mentioned in the proclamation, it appears to eliminate the opportunity to develop new water sources to facilitate intentional distribution of livestock to protect sensitive vegetation and soils.	GRAZ01-General, WAT01-General, ALT05-Alternative E	VRM was adjusted in the Proposed Plan that would allow for more development that is discussed in the comment. In the Management Actions by Alternative in the Livestock Grazing section the Proposed Plan would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements.
1979-1	Harvey Halpern		The final plan should require the agencies to immediately begin compliance monitoring and resource assessments, prohibit new water developments, and exclude livestock from perennial surface water, riparian areas, and springs.	GRAZ01-General, WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology)	Compliance monitoring occurs on an ongoing basis. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section, has management actions for new water developments. They are prohibited unless they can protect BENM objects. In the Proposed Plan, the Water Resources section includes protection for water sources.
2015-3	Thomas La Point		Livestock should be banned from areas where there is surface water.	GRAZ01-General, WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology)	The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section, has management actions for new water developments. They are prohibited unless they can protect BENM objects. In the Proposed Plan, the Water Resources section includes protection for water sources.
15381-13	Sagebrush Habitat Conservation Fund		3.4.5.2.2. Impacts Common to All Alternatives Livestock Grazing This section states: However all alternatives include management direction to mitigate the risks of these impacts and to emphasize sustainable, healthy rangelands with respect to grazing practices. There are no specific management directions proposed that would mitigate weed risk. If there were it would be nice to identify them and the mechanisms that would result in less weed propagation. The management direction is to coordinate, collaborate, incorporate Indigenous Knowledge. These directions are so vague there is no way to assess their impact on the noxious weeds. The only actual management actions are voluntary permit retirement, and the unavailable/unsuitable acreage. That leaves most of the planning area without meaningful mitigation. While the importance of biological soil crusts is recognized, there are no specific management actions related to grazing that would restore BSCs over 80% of the Monument.	GRAZ01-General, WEED01-General	Impacts of livestock grazing on vegetation and invasive plants is discussed in Chapter 3 of the Draft RMP/EIS. As outlined in Management Actions Common To All Alternatives in the Livestock Grazing section, livestock grazing will be implemented to meet the standards for rangeland health in a manner that is consistent with the protection of BENM objects, which include invasive species as an indicator. In addition, if monitoring indicates that domestic livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. BMPs for livestock grazing are listed in Appendix G of the RMP/EIS. Under the Proposed Plan, grazing would be managed so to maintain or improve soil stability, erosion and damage to BSCs.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
2007-1	Peter Guynn		Cattle grazing must be strictly controlled and reduced on all public land especially on any monument or park land. Cattle grazing always leads to predator control whether or not legal or not. Riparian areas are destroyed by cattle as well and the condition of the land.	GRAZO1-General, WILDFISH01-General, WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Proposed Plan in the Management Actions by Alternative in the Livestock Grazing section includes further acres made unavailable to grazing and limited to trailing only. The Proposed Plan in the Livestock Grazing section and Soil Resources section include management actions for the protection of soils. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. Predator control is managed by the State.
603-6	Retired BLM P&EC		I am concerned that BLM and the Forest Service remain biased toward grazing and other human uses that may harm BENM objects and resources. Please review the attachment relating to problems with BLM's regressive dominant management culture and with some suggested solutions. I believe that at least some of this information is relevant to this current BENM planning and NEPA process.	GRAZO1-General, DATA03-Suggest Additional Data Source .	The BLM and USDA Forest Service reviewed the provided literature and incorporated relevant literature where appropriate.

Table U-16. LWC

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
3125-2	Steve Knox		Page 2-34, 2.4.9, Lands with Wilderness Characteristics (BLM lands only) In this planning process you have analyzed and considered the spectrum of resource values and uses in the Bears Ears National Monument, considering each resource value and use with and against one another, and made proposals for how those resource values and uses would be managed. Since you propose to manage lands with wilderness characteristics (LWC) for their wilderness values and characteristics in Alternative E, the Agencies Preferred Alternative, then it would follow to designate LWC managed for their wilderness values and characteristics as Wilderness Study Areas (WSAs) under Section 202 of FLPMA and manage them under BLM Manual 6330 and Manual Handbook 8550-1, pending Congressional action on Wilderness designation.	LWC01-General	Per BLM Manual 6320, the BLM evaluates lands with wilderness characteristics through the land use planning process. When such lands are present, the BLM examines options for managing these lands and determine the most appropriate land use allocations for them. Considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) allowing for other multiple uses in an area while not protecting wilderness characteristics; (2) Minimize impacts to wilderness characteristics via management restrictions (e.g., terms and conditions of use or stipulations) while emphasizing other multiple uses; or (3) Protecting wilderness characteristics while providing for compatible multiple uses. The BLM may choose any one of these outcomes, or some combination thereof, for a parcel of land possessing wilderness characteristics, provided that the land use plan documents the basis for this determination. See the Proposed Plan under the Lands with Wilderness Characteristics section for management actions protecting LWC. The BLM, in the Proposed Plan is managing protect LWC as OHV Closed and VRM 1.The BLM does not have the authority to designate new Wilderness Study Areas.
3125-25	Steve Knox		Page 2-35, Lands with Wilderness Characteristics, Table 2-8, 2008 Monticello RMP, 1st action, Alternative A The management prescription for LWC in this alternative does not protect wilderness values/characteristics. Allowing motorized travel on vehicle ways in the LWC (I assume the routes that meet the definition of a road are cherrystemmed/ excluded) will degrade the natural character of the LWC and opportunities for solitude and primitive recreation, and maybe some supplemental wilderness values. This action should include OHV closed.	LWC01-General	Alternative A represents current management direction; therefore, no changes have been made to this alternative. Effects on LWCs from management under Alternative A are described in the Lands with wilderness Characteristics section of Chapter 3 in the Draft RMP/EIS. See other alternatives for different approaches to LWC management.
3125-9	Steve Knox		Page 2-34, 2.4.9, Lands with Wilderness Characteristics (BLM lands only), Table 2-8, Goals and Objectives, 1st Goal/Objective This goal/objective will not protect wilderness values/characteristics if you consider protection of those values in the context of competing resource demands. Youre either managing to protect the wilderness values of LWC or you are not. The language of this goal/objective should be written to protect wilderness characteristics period.	LWC01-General	Per BLM Manual 6320, the BLM evaluates lands with wilderness characteristics through the land use planning process. When such lands are present, the BLM examines options for managing these lands and determine the most appropriate land use allocations for them. Considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) allowing for other multiple uses in an area while not protecting wilderness characteristics; (2) Minimize impacts to wilderness characteristics via management restrictions (e.g., terms and conditions of use or stipulations) while emphasizing other multiple uses; or (3) Protecting wilderness characteristics while providing for compatible multiple uses. The BLM may choose any one of these outcomes, or some combination thereof, for a parcel of land possessing wilderness characteristics, provided that the land use plan documents the basis for this determination. See the Proposed Plan under the Lands with Wilderness Characteristics section for management actions protecting LWC. The BLM, in the Proposed Plan is managing protect LWC as OHV Closed and VRM 1.
16236-7	Michael Painter Californians for Western Wilderness, P.O. Box 210474 San Francisco, CA 94121	Californians for Western Wilderness	Route closures should also be instituted in lands with wilderness character to protect that character.	LWC01-General, ALT07-Modification of Existing Alternatives	See the Proposed Plan under the Land with Wilderness Characteristics of Chapter 3 and Travel Management of Chapter 3. In the Proposed Plan, lands being managed for the protection of wilderness characteristics are also OHV closed areas.
17573-100	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.8 Lands with Wilderness Characteristics (page 2-35) Lands managed for wilderness characteristics range from alternative A, 48,954 acres, to alternative E, 419,128 acres. Alternatives C through E will change from VRM class 2 to right-of-way (ROW) avoidance areas, and OHV travel will be limited to VRM class one, excluding ROW and closed OHV use. These alternatives will limit access, habitat improvements, and the ability to manage wildlife and their habitats within the monument. The DWR recommends the selection of Alternatives A or B (as it relates to this section if the Agencies decide to manage for additional LWC lands despite State objections)in the Final RMP.	LWC01-General, ALT07-Modification of Existing Alternatives	The management actions related to LWC under the Proposed Plan are described in Section 2.4.9.2, and reflect elements of various alternatives analyzed in the Draft RMP/EIS.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
889-59	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We strongly oppose designating any areas managed for the protection of wilderness characteristics / BLM Natural Areas / recommended wilderness within the Bears Ears National 52 Monument beyond those that already exist. A huge portion of the monument is already either designated Wilderness, WSAs, or BLM natural areas. We are concerned that some of the proposed management actions (particularly in alternatives D and E) would result in the vast majority of the monument being managed as de facto wilderness, to the exclusion of all other valid uses.	LWC01-General, ALT07-Modification of Existing Alternatives	Alternative A addresses current management of BENM. As such, this request is already within the range of alternatives analyzed in the RMP/EIS.
889-61	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Designating excessive amounts of BLM Natural Areas or recommended wilderness would only serve to prohibit legitimate multiple uses of the monument while needlessly hindering the agencies ability to actively manage these areas to promote forest health and reduce fire danger. We are especially concerned that any BLM Natural Areas or recommended wilderness areas that either include existing motorized routes or are adjacent to them would only be used as an excuse to close those routes in future travel management proceedings, or to mandate their closure outright as alternative D does by designating all lands managed for wilderness characteristics as OHV-closed. We therefore strongly oppose the creation of any additional BLM natural areas or recommended wilderness areas beyond those already in existence, and argue that arbitrarily designating all inventoried lands with wilderness characteristics as natural areas closed to OHV use is an abuse of discretion that is inconsistent with maintaining public access to important parts of the monument. There is no mandate in the monument proclamation to manage the majority of the monument for protection of wilderness characteristics, and it would be inappropriate for the agencies to adopt such an extreme action which would cause severe and undo harm to recreational opportunities and other multiple uses within the monument.	LWC01-General, ALT07-Modification of Existing Alternatives	Wilderness and wilderness characteristics are some of the many uses that the agency manages for. In Chapter 3 in the travel and transportation management section of the RMP/EIS the agencies have evaluated a range of alternatives regarding lands managed for wilderness characteristics and also analyzes the impacts each alternative would have on travel and recreation.
16784-15	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Table 2-8: Although SVP supports the requirements to maintain lands with wilderness characteristics, SVP finds all possible alternatives in this entire section to be vague about how the paleontological activities can be carried out. Because paleontological resources commonly occur in such wilderness areas, having no management plan specifically for paleontological resources would be problematic. SVP prefers an alternative that would allow paleontological inventories/surveys, excavations, and mitigations, that may involve some degree of surface disturbances, on a case-by-case basis. If any excavation of scientifically significant paleontological resources is deemed necessary in such areas, flexibility for allowing surface disturbances to protect and preserve the paleontological resources as well as the use of mechanical tools for their extractions should be permitted to qualified paleontologists on a case-by-case basis. SVP asks that any decision-making should be made in consultation with the agencies qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	LWC01-General, ALT07-Modification of Existing Alternatives, PALEOGE003-Paleo	The agencies considered the comment. In of the Detailed Descriptions of the Alternatives, Paleontological Resources under the Proposed Plan section of Chapter 2, the agencies would develop a paleontological resource implementation plan within 5 years in collaboration with the BEC. Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources. The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
18238-34	Chaitna Sinha		Though it is true that both the National Forest Management Acts 2012 Planning Rule and the Utah Wilderness Act of 1984 require the Manti-La Sal National Forest (M-LS NF) to inventory, evaluate, and recommend potential wilderness areas in the Forest Planning process, leaving Forest Service lands out of this plan regarding potential wilderness is a major oversight. Further, the BEC appears not to have been consulted in the Forest Planning process regarding wilderness review and evaluation. This is required under the Inter-Governmental Cooperative Agreement (IGCA) entered into between the five Tribal Nations and USDOI-BLM and USDA-FS on June 18, 2022.	LWC01-General, DECI01-Decision Process, PUBL02-Bears Ears Commission	The Bureau of Land Management (BLM) and the U.S. Department of Agriculture, Forest Service (USDA Forest Service) (collectively referred to as the agencies), in coordination with the BEC, are jointly preparing this new resource management plan and associated environmental impact statement (RMP/EIS) pursuant to BLM land use planning regulations at 43 Code of Federal Regulations (CFR) 1610. Although the USDA Forest Service has its own set of land use planning and administrative review processes to ensure compliance with relevant laws and regulations, throughout this process, the BLM and USDA Forest Service have agreed that the USDA Forest Service will adopt the BLMs land use planning and administrative review processes as allowed by 36 CFR 219.59 (BLM and USDA Forest Service 2022a). Given this, BLM regulations and direction are cited throughout this document and apply to both agencies. While the wilderness evaluation process outlined in the 2012 Planning Rule is outside the scope of this plan, the USDA Forest Service is conducting a wilderness evaluation for lands it manages in BENM, under its Forest Plan Revision process. The BEC and all other interested tribes have been involved and consulted with concerning the wilderness evaluation process, in both meetings and field trips to the areas.
576-1			The Bureau of Land Management should include the following items when drafting a management plan for Bear Ears National Monument: a landscape-level, zoned management approach to recreation that focuses use and development in existing, developed areas, while protecting more remote, fragile locations, wildlife habitat and migration corridors, cultural sites and resources, and quiet, backcountry experiences. Closing Arch Canyon, an important riparian area with sensitive plant and wildlife species and cultural resources, to motorized use. Managing all lands identified as having wilderness characteristics for the long-term protection of those values.	LWC01-General, REC01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, 205,721 acres of non-WSA LWC would be managed to protect their wilderness characteristics and 229,445 acres would be managed to minimize impacts on wilderness characteristics while allowing compatible uses that are consistent with the protection of BENM objects. The Proposed Plan employs a zoned approach to recreation management. Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18238-33	Chaitna Sinha		The DEIS states that [I]imitations on management actions and recreation use would be designed with consideration of seasonality in collaboration with the BEC. Id. The use of the descriptor limitations sets a negative tone and implies a lack of respect for the tribes cultural practices and values. We propose: Improve this management prescription to state: The agencies, in collaboration with the BEC, will design management actions and recreation use with consideration of seasonality and Traditional Indigenous Knowledge.	LWC01-General, TIK01-Traditional Ecological or Indigenous Knowledge, ALT05-Alternative E	Thank you for your comment. The agencies collaborated with the BEC on the development of the Proposed Plan. The agencies have determined to keep the current language.

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18238-32	Chaitna Sinha		We propose: Manage all LWC as OHV closed. As part of this management prescription, BLM will collaborate with the BEC to identify existing designated routes necessary for private wood harvest, and cultural/ceremonial purposes to remain open.	LWC01-General, TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan, all LWC managed to protect wilderness characteristics would be managed as OHV closed.
9255-15	Keith Alleman		I'd want to see more limitation on OHV acreage on BLM land. Allowing OHV travel on lands with wilderness characteristics or managed for wilderness characteristics is something I'd oppose. BLM should manage LWC by "protecting wilderness characteristics while providing for compatible multiple uses," which is apparently the 419,128 number, and that would mean eliminating or highly limiting OHV use. And because of that, it follows that I would support Alternative D's amount of acreage closed to OHV use, rather than the OHV exception carved out in Alternative E "protected LWC." Actually after looking at Table 3-35 some of the small acreage may not benefit from such restriction, but above some size like 500 acres (assuming the "Acres Found to Possess Wilderness Characteristics" in a unit are contiguous) I am certainly in favor of closure to OHVs.	LWC01-General, TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, WSAs, LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the motor vehicle use map.

Table U-17. Natural Soundscapes

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19026-18	Brian Carlstrom	National Park Service	3-255 3.4.13.2.2 Impacts Common To All - Soundscapes Document states: "Impacts to soundscapes from scenic overflights and drones in flight would occur under all alternatives." What are those impacts exactly? Does BENM receive commercial air tours? Scenic overflights referenced throughout document are in association with national park areas nearby that receive commercial air tours. The RMP DEIS does not directly address management of air tours for BENM. Might be good to consider how to address this issue now before commercial air tours over BENM become a concern. Maybe BENM co-management partners can set the standard now if want no air tours over the monument as part of Alt. E?	NOISE01	See the table Alternatives for Land and Realty in Chapter 2 where drone takeoffs and landings, different aircraft types (helicopter, fixed wing, hot air balloons, etc.) are described. See also the section on Management Actions Common to All Alternatives (Lands & Realty) in Chapter 2, where powered paragliders, and electric aircraft are mentioned, as well as the Impacts Common to All Alternatives (soundscapes) section in Chapter 3 which discuss impacts from aircraft and drone usage. Scenic overflights are expected to continue under all alternatives (See the Impacts Common to All Alternatives (Natural Soundscapes) section of Chapter 3; and the Cumulative Impacts section of Natural Soundscapes in Chapter 3). See also the section on Natural Soundscapes in the Executive Summary for discussion on airstrip landing or takeoff locations.
19026-19	Brian Carlstrom	National Park Service	3-255 Table 3-63 Existing Modeled L50 Sound Levels In Table 3-63 it's not clear over what time period the sound level needs to be achieved - are you looking for a median sound level (L50) of a given value, and if yes is that daytime L50? Or a 24- hour L50? This table is difficult for on-the-ground managers to determine if they have met the threshold, i.e. managers don't have the information they need to go out and measure and determine if they are meeting the standard. Maybe include more information in the text that describes how the metric is derived, how managers would use and implement, not just the target threshold?	NOISE01	The data used in the analysis in the RMP/EIS are tied to the concept of L50, a descriptor of loudness, which represents the existing ambient noise levels where the decibel level is exceeded 50% of the time. The Natural Soundscapes section of Appendix N acknowledges this data should not be used to evaluate noise levels in individual locations or at specific times. The National Transportation Noise Map Project, which provides context for existing noise levels in GSENM along rural highways and other roadways, was included to illustrate the increased noise levels adjacent to these roadways. The proposed soundscape management plan would be further informed by on-the-ground readings and other sources of noise data to meet BENM objectives.
19026-38	Brian Carlstrom	National Park Service	3-443 3.5.8.2.7. Impacts Under Alt. E - OHV use Again, having NPS boundaries depicted on the OHV maps would help better evaluate areas within BENM that would be open to OHV use and their proximity to NPS units. This would help inform need for acoustic monitoring in areas where NPS and BLM lands are adjacent or near. In desert environments that have limited vegetation, noise can travel farther and cause potential impacts to wildlife behavior and use of their habitat, and potential impacts to visitors wanting to experience quiet and solitude, as well as indigenous members seeking natural quiet needed for native and sacred practices. Limiting OHV use would help reduce noise impacts to adjacent NPS units and protect the acoustic environment. This would best be accomplished under Alt. D.	NOISE01	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and the Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on USFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USFS portion of BENM. Impacts of aircraft on the natural environment are discussed in backcountry airstrip use and impacts are discussed in the Chapter 3 sections for Natural Soundscapes, Cultural Resources, Archaeological Sites, Recreation Use and Visitor Services of the RMP/EIS. OHVs are defined in 43 CFR 8340.0 and include motorized aircraft and drones when on or immediately above public lands and waters, and when not being used in an authorized or emergency capacity.
17130-3	Carly Webster Moab, UT 84532		I do strongly support Alternative E's plan for managing the soundscapes of the monument. Off-Highway vehicle use should be reduced greatly to protect the monument from noise pollution. For this same reason, hunting should be limited across most of the monument, especially if hunters use dogs to chase, tree or trap game. I support the tribes' desire to have peace and quiet when visiting their sacred lands and holding ceremonies outdoors. Visiting these areas when they are quiet has been one of the most meaningful and memorable parts of my visits. In a world that is so chaotic and full of noise pollution, having wild places to retreat to is important for all human beings to reduce stress and reconnect to the natural world. It also allows the habitat and ecosystems of animals and birds to co-exist more easily with the encroaching, growing human population. Protections from noise pollution should be put in place for the animals and birds, as well as for humans!	NOISE01-General, ALT05-Alternative E	Hunting is outside of the scope of this RMP and falls under the jurisdiction of the State/UDWR. The Detailed Descriptions of the Alternatives section for Recreation and Visitor Services in Chapter 2 describes restrictions associated with pets including dogs used for hunting which varies across the suite of alternatives.
840-2	Wendy Lessig	Recreational Aviation Foundation	The noise study that is cited in the BENM draft RMP to support the takeoff and landing restriction is a noise study that was performed in the Grand Staircase-Escalante NM (GSENM). The GSENM noise study determined that noise from high-altitude commercial airline jets that overflew the GSENM was audible at ground level. The GSENM also referred to audible noise from vehicle engines. There was no	NOISE01-General, ALT07-Modification of Existing Alternatives, TRAVEL01-General	Thank you for your comment.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			mention or analysis of noise from aircraft take-offs or landings in the GSENM in the study. Thus, the GSENM noise study does not justify the restriction that aircraft only be allowed to take off and land at the Bluff Airport and Fry Canyon Airstrip within the BENM. The BENM draft RMP states the concern that scenic overflight routes associated with the adjacent Canyonlands NP per the National Parks Air Tour Management Act of 2000 will increase noise levels along the edge of the BENM due to the sightseeing air tour aircraft. The sightseeing aircraft would be flying along the boundary of the BENM and unlikely to be taking off or landing in the BENM. This noise concern does not justify the restriction that aircraft only be allowed to take off or land at the Bluff Airport and Fry Canyon Airstrip in the BENM. It makes sense to confine noisy activities to designated areas to preserve the quiet soundscapes throughout the rest of the BENM. Bluff Airport and Fry Canyon Airstrip are both near paved roads and are less sensitive to noise than other more remote areas.		
12746-28	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	The Proposal also creates expectations for sound levels that are functionally impossible to achieve in any manner. The Organizations have participated in professional sound testing as part of planning efforts in remote areas that are outside the scope of human created sounds, and this reporting simply does not align with any asserted planning or goals outlined in the Proposal. The horribly insufficient nature of information currently available on sound in the planning area is represented by the following map on sound levels in the area: [see letter for image]. The problematic failure of this information is again immediately apparent, as major state highways are often estimated to have similar sound levels when compared to remote areas far removed from anything on the planning area. While we do not contest that often these state highways may see limited amounts of usage, we also must recognize that the Federal Highways Administration estimates highway traffic at 70 to 80 dB. 52 This level of sound cannot be aligned with the Proposal assertion that state highways are averaging 40 dB. The inability of the soundscape inventory to align with existing decisions is again highlighted by the fact that the corridors around these routes do not align in any way with the ROS designations around these routes. ROS designations are required to address sound levels as one of the characteristics. While these tools may not overlap completely, there should be a strong correlation with these designations and there clearly is not. The Organizations concerns around the basic accuracy of the inventory expand as the most common level of sound asserted to be found on the Planning area is 32-37dB. This is immediately problematic as light rainfall is commonly estimated to be 40 dB.53 When this is compared to the map above, the assertion that most of the area is quieter than a lightly falling rain becomes problematic. Without a good understanding of the current conditions, the Organizations must question the quality of analysis supporting the assertion for a sound plan for the area. Again, this soundscape management plan is asserted to be needed under every Alternative provided to the public, but given the poor quality of data available, any meaningful analysis of possible impacts to satisfy NEPA is simply impossible.	NOISE01-General, DATA01-Analysis Methods and Data, DATA03-Suggest Additional Data Source	The data used in the analysis in the RMP/EIS are tied to the concept of L50, a descriptor of loudness, which represents the existing ambient noise levels where the decibel level is exceeded 50% of the time. The Natural Soundscapes section of Appendix N acknowledges this data should not be used to evaluate noise levels in individual locations or at specific times. The National Transportation Noise Map Project, which provides context for existing noise levels in GSENM along rural highways and other roadways, was included to illustrate the increased noise levels adjacent to these roadways. The proposed soundscape management plan would be further informed by on-the-ground readings and other sources of noise data to meet BENM objectives.
12746-39	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	The Organizations are very concerned that the Proposal moves well outside the scope of the Proclamation on the issue of sound management. We are unable to identify any portion of the Proclamation where this type of effort is required or even addressed. While this planning effort is not required under the Proclamation, the Proposal immediately identifies that sound is OHV, drone and aircraft based.54 How were these impacts identified and measured? Simply identifying the proper standards for measurement of sound has been a difficult undertaking in any planning effort. The Proposal simply omits this step and makes the conclusions noted above.	NOISE01-General, DATA02-Inadequate Methodologies	While natural soundscape is not specifically described in Proclamation 10285, the original proclamation (9558) which established the Monument, does specifically mention the "natural quiet" and "arresting quality of deafening silence" of BENM. To quantify impacts, different noise generating uses were compared with differing management approaches under each alternative to identify the level of protection of BENM soundscapes. The forthcoming soundscape management plan will identify methods to mitigate effects associated with trends and specific effects on soundscapes. This would include inventorying and monitoring soundscapes in collaboration with the BEC.
12746-40	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	Clearly, there is a significant difference between solitude and sound, and these requirements are already addressed with tools such as the ROS designations and Wilderness designations created by Congress that the Proposal already provides for. The Organizations are also concerned that neither of the planning documents currently in force for the area have any requirement for this type of soundscape plan. As a result, we must question the requirement for a soundscape plan in every Alternative, as we are unable to identify any requirement of this nature.	NOISE01-General, DATA02-Inadequate Methodologies	Proclamation 9558, which is incorporated into Proclamation 10285 describes the "natural quiet of the Bears Ears area" and says that "Bears Ears has that rare and arresting quality of deafening silence". The Detailed Descriptions of the Alternatives Visual Resource Management, Night Skies, and Soundscapes Section states the night skies management plan and soundscapes management plan would be developed to mitigate effects from BENM uses, including education about night skies (e.g., celestial observations), unimpeded natural viewscales, soundscapes, culturally important viewsheds, and their importance to BENM and Tribal Nations. The soundscape plan is an implementation plan that will be developed after this plan and will involve stakeholder considerations. Additionally, agencies would collaborate with the BEC to inventory and monitor soundscapes within BENM to identify general trends and specific effects from BLM and USDA Forest Service–managed uses within BENM.
17358-6	Ramona Blaber Oak Park, IL	Sierra Club	"Modifications" drawn from Alternative "D", or otherwise, will *further ensure* the acoustical preservation of scientifically well documented profound, pervasive depths of natural quiet, thus auditory acuity for humans – and especially for Bears! (with Bears Ears known to be twice as sensitive as human ears. This issue is especially meaningful to me as well-known articulator of natural quiet, within Sierra Club and elsewhere, such as Acoustical Society of America, based on my extensive beta-testing in Zion and Rocky Mountain national Parks, of LOWNOMS instrumentation focused on the astounding quality of natural quiet as found to extreme in Bear's Ears. I heard that first in Garden of the Gods for the entire time I was outside vehicle. That would be great location to put up educational signage, if not a special exhibit, about natural quiet, special acuity of black bears' ears, and the soul-enhancing opportunity of humans enjoying the "arresting" silence noted by President Clinton.	NOISE01-General, DATA03-Suggest Additional Data Source, ALTO4-Alternative D	An implementation level interpretation plan will be prepared and will involve stakeholder considerations

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889-82	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Since neither of the above two concerns are actually discussed in the DEIS, we now come to what appears to be the true motivation for banning drones across the entire monument – native American religious beliefs. Both the AMS document and the Bears Ears Intertribal Coalition proposed management plan repeatedly invoke the concept of preserving natural soundscapes in the monument, and the BEITC specifically gives this reason for asking the agencies to ban drones across the entire monument. While valuing natural soundscapes could have some secular purpose, as described in these documents it is presented as primarily a religious concept. Both the BEITC management plan and the DEIS reference spiritual reasons why the tribes value peace and quiet, such as the Hopi belief that loud noises disturb the spirits of their ancestors. ³⁸ As discussed above, while tribal members are free to believe whatever they want, Native American religious beliefs are an improper basis for federal land management policy and do not provide any justification for restricting recreational activities by non-Indians such as OHV driving or drone flying. As a proceeding under NEPA, the agencies are required to examine impacts on the human environment in this planning process. Ancient spirits are not part of the human environment upon which there can be a legally cognizable impact.	NOISE01-General, REC01-General; TIK01-Traditional Ecological or Indigenous Knowledge	The agencies reviewed and added two documents discussing drone noise effects to wildlife to References: Three Considerations around Drone Noise and Strategies for Mitigation and Terrestrial Megafauna Response to Drone Noise Levels in Ex Situ Areas. The analysis in the wildlife section of Appendix N was updated to include impacts to wildlife from drone use as provided in the above documents. Additionally, the Proclamation requires that the agencies ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations.
889-83	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	As far as secular values of preserving natural soundscapes go, drone flights are inherently ephemeral and do not significantly alter the natural soundscape of the monument. Many areas where drones might be flown are extremely remote and lightly visited, and someone occasionally flying a drone for 20 minutes in a location where no other humans or animals are present has no lasting impact on the overall soundscape of the monument. Modern drones are fairly quiet and are considerably quieter than a UTV or dirt bike. Recent FAA regulations imposing greater restrictions on larger drones has resulted in manufacturers increasingly producing smaller, lighter drones that make less noise than larger ones. The average consumer quadcopter cannot even be heard more than a few hundred yards away. Such devices simply cannot rationally be said to have any significant impact on natural soundscapes, and that is not a justification for prohibiting or restricting their operation.	NOISE01-General, REC01-General	The agencies reviewed and added two documents discussing drone noise effects to wildlife to References: Three Considerations around Drone Noise and Strategies for Mitigation and Terrestrial Megafauna Response to Drone Noise Levels in Ex Situ Areas. The analysis in wildlife section of Appendix N was updated to include impacts to wildlife from drone use as provided in the above documents.
840-3	Wendy Lessig	Recreational Aviation Foundation	I encourage the BLM to examine the noise effects of each of the different types of aircraft and their operations separately, rather than lumping all aircraft together. Private hobbyists who operate drones/UAS, powered parachutes, paramotors, gyrocopters, helicopters, which are types of aircraft that tend to operate in a localized area and/or at low altitude. The noise from these types of aircraft is more persistent and possibly bothersome to other BENM visitors than the temporary noise from a private noncommercial fixed-wing aircraft transitioning the area overhead or an aircraft arrival/landing at a backcountry airstrip followed by engine shutdown. Something for the BLM to consider is that these types of localized, low-level aircraft do not necessarily require an airport or airstrip from which to operate. Paramotors, powered parachutes, drones, etc., can transport their equipment by car or trailer, then park, set up and are capable of takeoff and landing from almost any open patch of land that is free of obstacles. Likewise, it is very uncommon to have conventional fixed-wing airplanes operating at the same airport as paramotors, powered parachutes, drones and gyrocopters, due to potential safety issues. The latter aircraft are much slower and generally do not have air-to-air radio communication capability compared to conventional fixed-wing airplanes and helicopters. The FAA requires pilots to see and avoid each other to avoid mid-air collisions. I encourage the BLM to take into consideration the safety aspects of different types of aircraft operations together at the same airport/airstrip. If this disparate mixture of aircraft will all be operating together at the Bluff Airport and Fry Canyon Airstrip, for safety, it might be prudent to have the slower aircraft operate along one side of the runway and the faster, larger aircraft traffic pattern on the other side of the runway to help keep them separated. Non-FAA data sources (i.e., Foreflight) list the traffic pattern at Fry Canyon Airstrip for landing in either direction as being to the west of the airstrip, over Utah State Route 95. The FAA Chart Supplement lists the current traffic pattern for Bluff Airport as left traffic, meaning that depending on which direction an aircraft is landing, the flight pattern will be either northwest or southeast of the runway. Since Bluff Airport has an FAA identifier and is listed as a public-use airport, it is possible to add a notice (NOTAM) to the FAA Chart Supplement to notify pilots of the traffic pattern for each type of aircraft, and for pilots to be vigilant for the slower aircraft and the potential safety hazard. However, although Fry Canyon Airstrip has an FAA identifier, it is categorized as a private-use airstrip, meaning that it is not listed in the FAA Chart Supplement and does not have access to the NOTAMs system to warn pilots of any hazards or restrictions. A suggestion for the BLM is to file the necessary forms with the FAA to recategorize the Fry Canyon airstrip as a public-use airstrip so that it will be easier for pilots to find out about any hazards at the airstrip through the NOTAMs. Alternatively, the BLM might consider whether there is another suitable open area in the BENM for the drones, paramotors, powered parachutes, etc., to drive to and operate that is farther from the airport/airstrip and in a suitable area where noise is not a sensitive issue. Commercial flights that take off and land in the BENM may increase as visitation to the BENM increases. Since commercial flights tend to offer visitors a package tour, where the sightseeing tour is flown repeatedly along the same route, it makes sense to limit the frequent takeoffs and landings of commercial flights to airstrips that are less noise sensitive, such as Bluff and Fry Canyon. There are all kinds of commercial uses for aircraft in the BENM, including sightseeing tours, film making, powerline/utility inspection, etc. I encourage the BLM to not outright ban any of	NOISE01-General, TRAVEL01-General, ALTO7-Modification of Existing Alternatives	See the Table for Alternatives for Land and Realty in Chapter 2 where drone takeoffs and landings, different aircraft types (helicopter, fixed wing, hot air balloons, etc.) are described. See also the Management Actions Common to All Alternatives for Lands & Realty in Chapter 2, where powered paragliders, and electric aircraft are mentioned, as well as the Impacts Common to All Alternatives for Natural Soundscapes section in Chapter 3 which discuss impacts from aircraft and drone usage. Scenic overflights are expected to continue under all alternatives (See the Impacts Common to All Alternatives and Cumulative Impacts sections for Natural Soundscapes in Chapter 3:). See also the Natural Soundscapes section in the Executive Summary for discussion on airstrip landing or takeoff locations.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			the commercial aircraft uses, rather include the provision in the BENM RMP to review any commercial proposals and control the commercial aircraft uses via a permit.		
840-4	Wendy Lessig	Recreational Aviation Foundation	Private, non-commercial, fixed-wing aircraft have been using the 18 existing, historic airstrips in the BENM area for the past 40-70 years for recreational purposes, enjoying dispersed, primitive camping. These are not new airstrips. These recreational pilots do not fly any particular or regular route or schedule to get to the airstrips. Pilots generally fly one or two passes over a backcountry airstrip to check for obstacles and condition of the landing surface before landing, parking the airplane and shutting off the engine. The noise is temporary and transient. Once on the ground, pilots and their passengers are quiet campers, the same as any backpackers. Likewise, when the recreational pilots leave, the aircraft engine would be audible near the airstrip as the airplane takes off and then fade away quickly as the airplane leaves the area. The reality is that use of the airstrips in the BENM is currently, and is likely to remain, intermittent and relatively infrequent. There is absolutely no noise from private, non-commercial, fixed-wing aircraft at the BENM airstrips when the weather is raining, snowing, stormy, too windy, too hot, too cold, foggy, misty, low clouds, or at night. Pilots do not fly to backcountry airstrips in instrument meteorological conditions, even if the aircraft is equipped with such instruments, because seeing and avoiding terrain is done visually in the backcountry, including the BENM. Aviation is a compatible use in the BENM backcountry, with seasonal usage aspects. I request that the BLM take this recreational aviation usage profile into consideration when choosing among the alternatives for management of the BENM.	NOISE01-General, TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and the Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on USFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USFS portion of BENM. Impacts of aircraft on the natural environment are discussed in Backcountry airstrip use and impacts are discussed in the Chapter 3 cumulative impacts sections for Travel, Transportation, and Access Management, Wilderness Study Areas, Wildlife and Fisheries, Natural Soundscapes Cultural Resource Management, Indigenous Peoples’ Religious Concerns and Tribal Use, Archaeological Sites, and Recreation Use and Visitor Services of the RMP/EIS. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.

Table U-18. Night Skies

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19026-16	Brian Carlstrom	National Park Service	3-280 3.4.15.2.2 Impacts Common To All - Night Skies Document states: "Longterm impacts from lands and realty actions on dark night skies would be minimized through the application of BMPs from BLM Technical Note 457..." Suggest adding "and a Lighting Management Plan developed by the BEC, interested Tribes, and Subject Matter Experts in lighting" or something similar.	NIGHT01	Thank you for your comment. See Impacts under Alternative E and the Proposed Plan.
19026-17	Brian Carlstrom	National Park Service	3-282 3.4.15.2.7 Impacts Under Alt E - Night Skies Document in 2nd para states: "... standards for accreditation as an International Dark-Sky Associated International Dark Sky Place..." IDA changed their name to just Dark Sky. Please re-word. Suggested re-word in E.S.	NIGHT01	The documents have been edited to reflect the new and correct name for the DarkSky organization.
19026-25	Brian Carlstrom	National Park Service	G-8 1.7 1.7.1 (Camping) and 1.9 Night Skies Consider some of the new LNT Soundscape and Dark Sky Guidelines under 1.7.1 and/or 1.9, especially as applicable to camping - use of headlamps, refrain from decorative lighting around campsite, etc. https://lnt.org/research-resources/soundscape-guidelines/ https://lnt.org/wp-content/uploads/2024/01/2023DarkSkyArtificialLighting-Guidelines-Final.pdf Each set of guidelines have a downloadable brochure option. These guidelines are meant to apply to all people recreating on all public lands.	NIGHT01	See management in the Chapter 2 Night Skies section to develop a night skies management plan. These suggestions may be considered in the future as part of the development of that plan. The agencies will also seek to work with the NPS on the development of that plan.
19026-3	Brian Carlstrom	National Park Service	ES-20 ES-5.1.15 Night Skies Document states: "Additionally, under Alternative E, the BLM and USDA Forest Service would promote night sky resources with the goal of the program to meet or exceed the standards for accreditation as an International Dark-Sky Association International Dark Sky Place." IDA has changed their name to just Dark Sky. Could re-word to say "...certification as an International Dark Sky Place by the non-profit organization, Dark Sky."	NIGHT01	The documents have been edited to reflect the new and correct name for the DarkSky organization.
15334-6	Bailey Brennan	National Wildlife Federation	We support the agencies proposal to work with the BEC to protect the Monuments dark night skies. President Obamas Proclamation 9558, incorporated by President Biden in Proclamation 10285, described the Monuments impressively dark night skies: The star-filled nights and natural quiet of the Bears Ears area transport visitors to an earlier eon. Against an absolutely black night sky, our galaxy and others more distant leap into view. Further, the BEITC Plan recognizes that night sky in open spaces should be protected in order to preserve these ancestral connections. Light and dust pollution are factors that affect the quality of the night sky.1 The BLM and Forest Service properly propose management actions that protect and improve the Monuments dark night skies as a Monument object and for the benefits they provide to visitors and certain ecological processes.	NIGHT01-General	Thank you for your comment. See Impacts under Alternative E and the Proposed Plan.
7958-7			DARK SKIES: Under the Preferred Alternative E, the plan expects to "protect 100% of Bears Ears." With San Juan County Planning and Zoning recently approving a 460 foot communications tower with flashing red lights on top of it on Cedar Mesa (on state land), one of the BLM's "last great places" will be forever altered.	NIGHT01-General	As described in Impacts under Alternative E and the Proposed Plan, impacts on dark night skies could occur from actions on non-federal lands under any alternative as the BLM and USDA Forest Service do not have the ability to restrict or prohibit lighting on non-federal lands. The cumulative effects analysis will be updated to acknowledge the potential for projects on adjacent non-federal lands.

Table U-19. Other

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
16046-1	Tyler Ivins		We have been running livestock in the area even before the passing of the Taylor Grazing Act of 1934. Due to the history and passing of the Taylor Grazing Act, we feel that grazing and the specific allotments found within the Bears Ears National Monument should and need to be considered Traditional Cultural Properties. Due to the rich history of our family, and many of the ranching families, in the area we feel that grazing is a Tradition Cultural Practice and many of the areas and objects that are vital to our livelihood should be considered Traditional Cultural Properties.	OTHER01-Other	The agencies do not have sufficient information to begin evaluating lands used for livestock grazing as a TCP. The agencies not have a delineated tangible area or property to be evaluated as a TCP. Accordingly, the agencies are not able to evaluate livestock grazing as a TCP in accordance with Section 106 at this time. Further, there is no identified single community or group that are associated with, and value the traditional practice of grazing (see National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties). Additionally, the Proposed Plan would not result in adverse effects to livestock grazing practices by making areas unavailable to grazing; approximately 97% of BENM lands that are currently available would remain available to grazing which highlights the continued viability of grazing in the Monument. Additionally, the decisions in the BENM RMP would not necessarily prevent grazing of these areas in the future. Areas available and unavailable to grazing may be reevaluated through future land use planning efforts.
480-1			2.4.15.1. GOALS AND OBJECTIVES As we are well aware, some tribal members who call BENM part of their ancestral homelands are the families of murdered or missing women, and/or have experienced gender-based violence in the region. INCLUDE THIS GOAL: Provide for the public's need for information by identifying where the nearest resource centers are with information regarding assistance for victims of gender-based violence, sexual assault, Sexually Transmitted Diseases (STIs), predation and harassment, and provide where visitors may find phone numbers, and other technical information, about resources. Include where BENM visitors and tribal members can find information about MMIW. (Differentiate that in an emergency, always call 911.)	OTHER01-Other	Thank you for your comment. The request is outside of the scope of the Proposed RMP/Final EIS.
480-2			2.4.15.2. MANAGEMENT ACTIONS COMMON TO ALL ACTION ALTERNATIVES INCLUDE THIS ACTION: Include information as a Management Action for the Interpretive Plan to identify the agency that will be responsible for the management of conducting and processing state and federal FBI background checks on people working with tribal children at the Traditional Knowledge Institute on public lands. Do not let criminal background checks become a loophole in federal public lands management. Identify in this plan the agency that can be designated to oversee how the background check processes could be coordinated and managed for the Traditional Knowledge Institute. Have that agency complete an annual report about background check management pertaining to those people who wish to work with children on public lands associated through the Traditional Knowledge Institute. REQUIRE a disclosure: In the event that there are third-party groups or organizations or nonprofits that seek to facilitate educating children at BENM by advertising or partnering with the Traditional Knowledge Institute, must require a disclosure to the parents of children that states whether or not those third-parties have been screened for federal background checks on their staff/volunteers and passed the background check process. CLOSE THIS LOOPHOLE: There is a state law in Utah that short-term summer camps (such as a 3 or 4 day summer camp) does not require federal background checks on adults working with children. Provide federal guidance that any adults seeking to work with children on public lands for any duration of time must have a completed and approved background check on file. HELP KEEP SEX PREDATORS OUT OF BENM AND AWAY FROM WOMEN & KIDS! Set up a BENM Task Force to identify how to coordinate resources around strengthening and sharing information to prevent sex crimes on BENM public lands. DUE DILIGENCE: Ensure that just like national parks, the public lands at national monuments are safely accessible for all. Some people might avoid BENM because they don't know if it's safe due to sexual predators or lack of coordination of resources or federal and tribal oversight. Help stop out-of-state sex predators from swooping in to work, volunteer or help create materials at the Traditional Knowledge Institute, ensure an agency is responsible for coordinating that federal background check processes are in place before the Traditional Knowledge Institute interacts with children. Provide information about how the public can report sex predators and violence on BENM public lands or call 911. Predators can be skilled at grooming and then hurting women and children in secret. Provide a directory of information and resources to help families and victims of sexual crimes and sexual assault.	OTHER01-Other	Thank you for your comment. The request is outside of the scope of the Proposed RMP/Final EIS.
18696-10	Julian Soncco		Provide funding commitments to provide educational programming, training and education materials for Agencies and Bears Ears Commission and the public regarding the Missing and Murdered Relatives initiatives to strengthen and support Tribal members who go missing near or on the monument.	OTHER01-Other, PUBL02-Bears Ears Commission	While the Missing and Murdered Relatives initiatives are outside the scope of the BENM RMP planning process, it is important concern of the agencies and our law enforcement team.

Table U-20. Paleontology/Geology

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15888-3	Ben UT		In the same vein, mineral and fuel exploration for private profit is not a public good, and destruction of lands for these purposes should be discouraged throughout the park.	PALEOGE001-General	Proclamation 10285 withdrew BENM from the operation of the public land, mining, and mineral leasing laws. This is reflected in the Alternatives for Geology and Minerals table Chapter 2. of the Proposed Plan.
16784-39	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	If any excavation of scientifically significant paleontological resources is deemed necessary in such areas, flexibility for allowing surface disturbances to protect and preserve the paleontological resources as well as the use of mechanical tools for their extractions should be permitted to qualified paleontologists on a case-by-case basis. SVP asks that any decision-making should be made in consultation with the agency's qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	PALEOGE001-General	Under the Proposed Plan, excavation would be allowed in certain cases, as determined by the agencies in consultation with the BEC, for the collection of paleontological resources by permit only and with stipulations that minimize disturbance to BENM objects. The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study. Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.
16784-40	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	We note that trampling by large animals, such as horses, can have a negative impact on paleontological resources at or near the ground surface. SVP asks that any decision-making should be made in consultation with the agency's qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	PALEOGE001-General	The Environmental Consequences section for Paleontological Resources discusses impacts to paleontological resources from grazing. Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.
16784-41	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	However, SVPs preferences are alternatives that would provide flexibility on a case-by-case basis to access paleontological sites (potentially including the use of motorized vehicles and devices like jackhammers and rock saws) and to conduct carefully managed surface disturbing activities, such as paleontological surveys, mitigations, and excavations. SVP asks that any decision-making should be made in consultation with the agency's qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	PALEOGE001-General	Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources. Under the Proposed Plan in the Detailed Descriptions of the Alternatives for Paleontological Resources, Management Actions By Alternative section of Chapter 2 , collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16784-42	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Page 3-18: As explained above, SVP suggests revising the last sentence on this page to read, Casting of vertebrate fossils, including dinosaur tracks, in the management area would be prohibited unless under a scientific or research permit issued by the BLM Utah State Office, except in locations that have been specifically approved by qualified paleontologists for casting activities by members of the public.	PALEOGE001-General	The agencies have considered this comment. In the Proposed Plan, "in-situ" has been added to the management action related to casting. Under the Proposed Plan in the Detailed Descriptions of the Alternatives for Paleontological Resources, Management Actions by Alternative, section of Chapter 2 , collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16784-43	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Page 3-26: RMP in reference to Alternative E states: the BEC notes that any work done involving fossils should not be extractive. Therefore, under Alternative E, collaboration between agencies and the BEC is highlighted to implement appropriate measures, including but not limited to no extraction of fossil resources from BENM; avoidance, restoration, and construction of physical barriers; or other methods to separate the public from paleontological resources. These practices would retain the scientific and cultural integrity of paleontological resources by minimizing or eliminating unnecessary disturbance by discretionary actions. As explained above, this statement is contradictory to the text of the BEC management plan presented in Appendix L and is contradictory to the goals established in Proclamation 10285. As the assessment in this paragraph points out, this management action would also result in vandalism and destruction of paleontological resources, which also contradicts the goals of Proclamation 10285 as well as the PRPAs requirement to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	PALEOGE001-General	Under the Proposed Plan in the Detailed Descriptions of the Alternatives for Paleontological Resources Management, Actions by Alternative section of Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
1689-2	Ralph Ferrara UT		Paleontological resource rest in Shay Canyon must be defined. Is the vegetation surrounding paleontological sites what is at stake with regard to resource rest? More information is needed to help readers understand why traditional use is considered in the same statement as resource rest as a reason to close Shay Canyon for paleontological consideration.	PALEOGE001-General	Resource rest is informed by Traditional Indigenous Knowledge. The Traditional Indigenous Knowledge and the Bears Ears Landscape section of Chapter 3 discusses Traditional Indigenous Knowledge in the BENM landscape.
3125-5	Steve Knox		Page 2-15, 2.4.4, Paleontological Resources, Table 2-3, 2008 Monticello RMP It is unclear what See Management Above refers to. Please clarify.	PALEOGE001-General	See the Detailed Descriptions of the Alternatives for Paleontological Resources Management Actions Common to All Action Alternatives section in Chapter 2.
607-2	Isaac Anderson		However, one aspect that I would like to see more of is in regards to uranium mining. Uranium mining has had negative impacts on both the viewshed and watershed, and there is a threat to BENM from continued uranium mining. I believe it would be beneficial for the BLM and USFS to consider the impacts of uranium mining, both past and present, both inside and near the borders of BENM and to especially consider the effects on human and environmental health that this mining would and has	PALEOGE001-General	Per Proclamation 10285 and as included in the Detailed Descriptions of the Alternatives, Geology and Minerals section of Chapter 2, subject to valid existing rights, BLM and NFS lands within BENM are withdrawn from location, entry, selection, or patent under the Mining Law of 1872 and from disposition under all laws relating to mineral and geothermal leasing. As stated in the Air Quality section of Chapter 3, there is no current production of uranium in BENM, and no emissions or radiation are anticipated under

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			caused. It would be beneficial for the agencies to conduct this research to have a fully informed RMP-EIS that encompasses health hazards (both human and environmental) of uranium.		any alternatives. Details regarding the effects of uranium from abandoned mines and natural sources on water quality and the corresponding reporting and management actions are discussed in the Surface Water Quality and Groundwater Springs sections of the Water Resources section in Chapter 3.
17493-1	Robert Graves		I am concerned about RMPs' stance on fossil collecting and would prefer to support any option that includes permitted fossil collection for scientific research, museum exhibition, and public education and outreach. Permitted collection and curation by qualified paleontologists is the only way to ensure that fossil resources are preserved for scientific research and educational purposes. "Option E" should be modified with "Option A" language in the paleontological resources section. This will allow fossils to continue to be studied, excavated, enjoyed and enhanced by the Traditional Indigenous Knowledge that tribes have about so many of the resources within the BENM region. Only "Option A" protects permitted paleontological collection as stipulated within the Paleontological Resources Protection Act and the Presidential Proclamations establishing and restoring Bears Ears National Monument.	PALEOGEO01-General, ALT05-Alternative E	Under the Proposed Plan in the Detailed Descriptions of the Alternatives for Paleontological Resources Management Actions by Alternative section, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16784-7	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	SVP prefers an alternative that would ideally prohibit, or minimally strongly discourage or limit, any forms of mineral resource activities where very high potential for paleontological resources exists, particularly if areas of interest have the Potential Fossil Yield Classification (PFYC) rating of 4 or 5. For any lands of interest, no mineral activity permits should be issued prior to each mineral activity without proper paleontological surveys and any necessary excavations/mitigations by qualified paleontologists, including BLM or USFS paleontologists.	PALEOGEO01-General, ALT07-Modification of Existing Alternatives	Per Proclamation 10285 and as included in the Geology and Minerals section of Chapter 2, subject to valid existing rights, BLM and NFS lands within BENM are withdrawn from location, entry, selection, or patent under the Mining Law of 1872 and from disposition under all laws relating to mineral and geothermal leasing. Under all Alternatives, the agencies would manage any operations that occur under the mineral leasing laws pursuant to valid existing rights in a manner that protects and mitigates impacts to the preservation, restoration, and protection of BENM objects. See the Proposed Plan in Management Actions Common to All Action Alternatives for Paleontological Resources and the Alternatives for Paleontology table in the Management Actions by Alternative sections of Chapter 23 for more information on the management actions that involve surveys and mitigation for discretionary actions.
8677-3	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	With respect to paleontological resource management, as explained in Appendix 1, we are gravely concerned that the BLM & USFSs preferred alternative in the draft plan (Alternative E) as well as Alternatives B, C, and D, would severely limit or even forbid permitted collection and preservation of significant fossil resources from BENM. NHMU favors alternatives that allow the BLM and USFS the greatest flexibility in managing and preserving BENM fossil resources, including paleontological research, permitted surface collection and excavation of fossils, and curation of these fossils in federally approved, publicly accessible repositories, consistent with the Paleontological Resources Preservation Act of 2009 (Public Law 111-11, Subtitle D: 16 USC 470aaa). Most importantly, supporting paleontological research, including the collection and preservation of significant fossils, is the only approach that is consistent with the founding directives of BENM, namely Presidential Proclamation 9558, which states: protection of this area will provide important opportunities for further paleontological study; and Presidential Proclamation 10285, which emphasizes, important paleontological resources remain to be discovered, and future exploration will greatly expand our understanding of prehistoric life. We further highlight that the importance of the paleontological resources within BENM, and the necessity of their protection and preservation within the Monument, was only realized because of the permitted collection, curation, and scientific study of these fossils by NHMU and other institutions.	PALEOGEO01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan in Management Actions by Alternative section for Paleontology in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
8677-4	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg ES-2, item 5: Protect important paleontological resources should be modified to Protect, preserve, and manage scientifically significant paleontological resources, to be consistent with the requirements of the Paleontological Resources Preservation Act (PRPA) of 2009 (Public Law 111- 11, Subtitle D: 16 USC 470aaa). 43 CFR Part 49 49.30 and 36 CFR Part 291 291.1 obligate the BLM and USFS to preserve, manage, and protect paleontological resources on and from Federal land using scientific principles and expertise, and to coordinate these activities with the scientific community.	PALEOGEO01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan in Management Actions by Alternative section for Paleontology in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
3110-2	Shauna Archer 6277 West Freedom Hill Way Herriman, UT 84069		Bears Ears National Monument is a significant area for paleontology, archaeology, and Native American. Access and studies in the national monument should be promoted in a cooperative effort among the BLM, the tribes, and field research organizations in these disciplines.	PALEOGEO01-General, CUL01-General, ARC01-General	The Management Actions Common to All Action Alternatives for Paleontological Resources section of Chapter 2 notes that management actions for all the alternatives include collaboration between agencies and the BEC to provide protection of paleontological resources while providing public access to those resources for scientific education and study. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Management Actions by Alternative section for Paleontology in Chapter 2). See the Paleontological Resources and Geology section of Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. Goals, objectives, and management actions for ongoing research, outreach, and public education regarding cultural resources within the monument are provided in the Cross-Cultural Education and Outreach section of Chapter 2.
11232-7	Andy Butler		One of the key issues addressed by the Monument Proclamation is the protection and scientific study of the rich paleontological resources within the Monument. Continued collection and study of this resource should be allowed, by permit to authorized scientists.	PALEOGEO02-Related to research communities, local communities, and visitor experience	The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					The Goals and Objectives for Paleontological Resources section of Chapter 2, includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, the Management Actions Common to All Alternatives section for Paleontological Resources in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
15888-2	Ben UT		Beyond this, I think the fundamental purpose of a monument like this is the protection of the land and landscapes, with attention paid to the public good. Activities such as paleontological (yes, there are fossils in the area) and archaeological research to expand public knowledge should be welcomed and encouraged. This knowledge could then be shared locally at the monument via signage, pamphlets, and visitors' centers.	PALEOGE002-Related to research communities, local communities, and visitor experience	The Paleontological Resources section of the Proposed Plan includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, the section includes management actions that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
16321-1			This park should allow for fossils to be studied. Learning about the ecology of the ancient past can give knowledge that can used in the future to help protect our natural spaces. Please allow paleontologist to study the fossil beds residing in your park.	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT07-Modification of Existing Alternatives	The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
16784-10	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Page 2-14, third action point, Alternative E: In the context of agencies collaborating with BEC to gather information and collaborating on information gathering from Tribal Nations, please insert Agencies would organize mutual learning activities between Tribal Nations and the broader paleontological community about the nature and interpretation of paleontological resources [recognizing, of course, that some tribal members are also paleontologists and vice versa].	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT05-Alternative E	The agencies considered the proposed language. In the Management Actions Common to All Resources and All Alternatives section of Chapter 2 , management actions include that the "agencies would engage on an ongoing basis in joint dialogue, knowledge sharing, and learning programs for agency managers and professional staff, Tribal officials, and other appropriate partners."
16784-35	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Table 2-18: Less regulated ROW would make it easier for people to purposefully or unwittingly disturb paleontological sites or remove paleontological resources, particularly in the absence of increased law enforcement activities or paleontological monitoring. Land development and land use typically have a negative impact on paleontological resources. Therefore, SVP prefers alternatives that would limit ROW, including activities pertaining to renewable energy and backcountry byways. If new ROW corridors are suggested to be developed, SVP asks that the agency's qualified paleontologists in the region be consulted for the most optimal pathways that will eliminate, or at least minimize, the potential for damages to paleontological resources, if any, in the area.	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, which includes ROW open areas, the agencies would protect paleontological resources, as they are BENM objects, from ROW development and discretionary actions which is included in the management actions discussed in the Management Actions by Alternative section for Paleontological Resources in Chapter 2. The Proposed Plan (Management Actions by Alternative for Lands and Realty section in Chapter 2) also includes areas that are excluded from ROWs, meaning there won't be any new ROWs in those areas. The Proposed Plan also includes areas that are avoidance for ROWs, meaning the agencies would seek to avoid putting ROWs in that area unless they couldn't otherwise.
16784-8	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Table 2.2: Collection of paleontological resources necessary to preserve scientifically significant specimens generally involves some level of ground-disturbing activities. Therefore, SVP prefers management alternatives that would permit the collection of paleontological resources for scientific research. Any of the alternatives with an amended provision for permitted paleontological collecting is preferred and should follow the rules and guidelines set forth by PRPA (16 USC 470aaa) and its resulting regulations for federal lands managed by the Department of the Interior (43 CFR Part 49) and USFS (36 CFR Part 291).	PALEOGE002-Related to research communities, local communities, and visitor experience, DEC107-Compliance with other laws and policies, ALT07-Modification of Existing Alternatives	Under the Proposed Plan in the Management Actions by Alternative for Paleontological Resources in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16860-1	Donald DeBlieux 7903 Douglas Dr Park City, 84098		I am commenting as a concerned citizen of Utah and a paleontologist. There seems to be conflicting information in the draft management plan regarding the collection and study of paleontological resources by qualified and permitted scientists. I encourage the BLM to work with the tribes so that whatever alternative is chosen they allow for the collection and study of fossils by permitted scientists. The resource is only valuable when these activities are allowed.	PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Proposed Plan in the Management Actions by Alternative for Paleontological Resources in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
17004-1	Stephen Fribley		The fact that Indigenous tribes see and feel the desire to learn more along with paleontologists about the world - and particularly Bears Ears National Monument at this time - before they arrived here is STRONG support for allowing collaboration between the tribes and the paleontologists. I have seen results of research done by Dr. Nathan Ong and find the results to be very eye-opening. CONTINUE to ALLOW SCIENTIFIC collection of fossils!!!	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT07-Modification of Existing Alternatives	Under the Proposed Plan in the Management Actions by Alternative for Paleontological Resources in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
17573-69	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The primary concern paleontologically is that only alternative A allows for the collection of scientifically significant fossils. The other alternatives provide greater protection of the land and resources generally, with the prohibition of fossil collection by permitted researchers greatly impeding scientific research.	PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Proposed Plan in the Management Actions by Alternative for Paleontological Resources in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17573-71	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The AMS document indicates the original plan was to manage paleontological resources for their scientific and educational values, and not to preserve and protect by making them off-limits to scientists and visitors alike. However, the DRMP/EIS analyzes constructing barriers to separate the public from paleontological resources. This is a stark deviation from the AMS without any scientific or even non-scientific justification. It appears from the DRMP/EIS that the agencies plan to maintain the existing public use sites like Newspaper Rock, Mule Canyon, and House on Fire, but the only existing interpretive site for paleo is at the Butler Wash Tracksite. It is concerning and internally unjustified that the RMP/EIS Management Actions for Paleontology in all, but Alternative A would completely prohibit the collection of scientifically significant fossils.	PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Proposed Plan in the Management Actions by Alternative for Paleontological Resources in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The Proposed Plan has also been reworded to promote education of paleontological resources and protect those resources from potential impacts from recreation.
17948-1	Robert Gay, Brandon Peacock, Xavier Jenkins, Leif Tapanila	Idaho Museum of Natural History; Idaho Museum of Natural History; Idaho Museum of Natural History	Under all alternatives proposed, responsible scientific excavation and extraction are banned within BENM. This does not achieve the stated purpose of Proclamation 10285. About one-third of BENM is underlain by fossiliferous rock units that have the highest possible Potential Fossil Yield Classification (PFYC) rating of "5", indicating that they are highly likely to yield new scientifically important paleontological resources (Figure 3-2, p A-51, Vol. 2 of the draft RMP/EIS). Most of the remaining two-thirds of BENM are underlain by rocks with PFYC ratings of "3" or "4", which also indicate a substantial likelihood for important discoveries. To date, fossils from BENM have been critical for understanding the response of life to the largest mass extinction in our planet's history (https://qiw.utahgeology.org/qiw/index.php/GIW/article/view/82). This would not have been possible without the permitted, responsible excavation, extraction, and curation of fossil materials into federally accredited repositories.	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT07-Modification of Existing Alternatives	Under the Proposed Plan in the Management Actions by Alternative for Paleontological Resources in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
18677-8	Benjamin Bellorado Tucson, AZ		Making blanket prohibitions on collecting fossils, lithic materials, tree-ring (dendrochronological) samples is both unethical and irresponsible and is antithetical to the future of collaborative management. Both archaeologists and paleontologists should, by permit, be able to collect and study resources in order to understand them and protect objects and values in the proclamation.	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, Goals and Objectives for Paleontological Resources section of Chapter 2, collection of BENM objects would be prohibited except where the collection is specifically allowed in Proclamation 10295 or 9558 and permitted under applicable agency authority.
35-4	Nathan Ong		Having read through the paleontological resources portion of the proposal, I support Alternative B, C, or D. Alternative A is insufficient, and Alternative E is too restrictive. Fossil collection is an important aspect of the field, so it must continue to be conducted by qualified and permitted researchers, however I see no reason why photogrammetric models and specimen casting rights cannot be shared with tribal nations. Likewise, I would be open to requirements for land stewardship acknowledgements in papers published from BENM land and specimens.	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT07-Modification of Existing Alternatives, TIK01-Traditional Ecological or Indigenous Knowledge	Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Management Actions by Alternative for Paleontological Resources in Chapter 2). See the Environmental Consequences for Paleontological Resources section of Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources.
446-1	James Kirkland		As a paleontologist who has researched our deep time heritage on the Colorado Plateau for more than 50 years, I request that any approved management plan include opportunities for permitted paleontologists to conduct excavations required for paleontological research, with the resulting fossils and field reports curated into approved repositories. Additionally, opportunities for paleontological educational outreach into all our communities including the various tribal nations within the Four-Corners region should be facilitated. Paleontology is a gateway science that excites children of all ages and encourages them to learn more.	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Management Actions by Alternative for Paleontological Resources in Chapter 2). See the Environmental Consequences for Paleontological Resources section of Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources.
449-1	CHUCK PELL		This Plan E should be modified to include the permitted collection of the unique fossils in the BENM, only by qualified researchers, to subsequently be curated in an repository approved by all parties.	PALEOGE002-Related to research communities, local communities, and visitor experience, ALT05-Alternative E	Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Management Actions by Alternative for Paleontological Resources in Chapter 2). See the Environmental Consequences for Paleontological Resources section of Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources.
8677-20	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 3-13, paragraph 4, last sentence: Referring to paleontological resources, the draft RMP states: Tribal values prioritize the remains of ancient beings staying in situ (see Appendix L). This is simply wrong; Appendix L makes no such statement, only that paleontological resources should be respected and protected (see Part C, pg 29, and Part E of Appendix L in Volume 2 of the draft RMP). As noted in several other comments above, the only way to properly preserve most scientifically significant fossils is to allow their permitted collection and curation in a federally approved, publicly accessible repository. For most scientifically significant fossils, collection and curation is the only way to ensure that the BLM and USFS comply with their duty to preserve and protect paleontological resources (PRPA), "provide important opportunities for further paleontological study" (Presidential Proclamation 9558), permit future "exploration [that] will greatly expand our understanding of prehistoric life" (Presidential Proclamation 10285), manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1), and facilitate "paleontological knowledge, public education, or management of paleontological resources" (43 CFR Part 49 49.120 and 36 CFR Part 291 291.13). More broadly, this sweeping statement ignores the	PALEOGE003-Paleo	Under the Proposed Plan in the Management Actions by Alternative for Paleontological Resources in Chapter 2, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The Proposed Plan also has a paleontological resource implementation plan which would include education and outreach to local communities and would be completed within 5 years.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			diverse views that tribes and tribal members hold regarding paleontological resources. Several tribes that are members of the Bears Ears InterTribal Coalition or have ancestral lands within the BENM region, have longstanding and successful paleontological programs on their sovereign lands allowing permitted fossil collection, curation, and scientific study in collaboration with qualified paleontologists. NHMU acknowledges the critical importance of Tribal Indigenous Knowledge and Tribal values, and supports the collaboration between BLM, USFS, and tribes to co-manage cultural and paleontological resources. However, the museum emphasizes that paleontological resources can be protected and preserved through permitted collection and curation while respecting Tribal values through cooperation between qualified paleontologists, land managers, and tribal partners.		
8677-22	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 3-26, section 3.4.1.2.7, paragraph 1: This management policy under Alternative E will result in the destruction of scientifically significant paleontological resources by natural and human agents. Therefore, it is in direct conflict with federal law (PRPA), the founding documents of BENM (Presidential proclamations 9558 & 10285), and federal regulations (43 CFR Part 49 and 36 CRF Part 291) that require the BLM and USFS, which require these land management agencies to protect and preserve fossils using scientific principles and expertise and ensure future opportunities for paleontological exploration and study. The only way to remedy this conflict with federal law and regulations is to allow permitted collection of paleontological resources by qualified paleontologists, and curation of these fossils in federally approved, publicly-accessible repositories.	PALEOGE003-Paleo	Under the Proposed Plan in Section 2.4.4.3, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16784-9	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Page 2-13: One of the Goals and Objectives (2.4.4.1.) states Protect paleontological resources in BENM in collaboration with the Bears Ears Commission and Traditional Indigenous Knowledge regarding the value of these resources to the BENM cultural landscape. We recommend the following rephrasing for consistency with PRPA without changing the intent of this sentence: Protect, preserve, and manage paleontological resources in BENM in collaboration with the BEC and Traditional Indigenous Knowledge regarding the scientific value of these resources to the BENM cultural landscape. The addition of the context of preservation would also be consistent with the first item listed under the Goals and Objectives for 2.4.3. Geology and Minerals.	PALEOGE003-Paleo, ALT05-Alternative E	The agencies considered the comment. Value as used in the goal and objective could include but would not be limited to scientific value.
16997-1	Simon Masters		I am concerned about the Resource Management Plans' stance on fossil collecting. Permitted collection and curation by qualified paleontologists is the only way to ensure that fossil resources are preserved for scientific research and educational purposes. I would prefer to support any option that includes permitted fossil collection for scientific research, museum exhibition and public education & outreach. Only 'Option A' protects permitted paleontological collection, as stipulated within the Paleontological Resources Protection Act and the Presidential Proclamations establishing and restoring Bears Ears National Monument. I would prefer an option where 'Option E' is modified with the 'Option A' language in the paleontological resources section. This will allow fossil resources from BENM to be studied, excavated, enjoyed, and enhanced by Traditional Indigenous Knowledge.	PALEOGE003-Paleo, ALT05-Alternative E	Under the Proposed Plan in Section 2.4.4.3, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
17389-1	Zachary Lyons-Weiler		BENM has incredible paleontological resources from many periods, but its late Paleozoic record may be the most exciting. Just before working on this comment, I finished editing a poster on fish fossils from the BENM, as they are deeply significant to our understanding of early ray-finned fish evolution. Last June, I joined an international team of researchers, including Dr. Adam K. Huttenlocker and Dr. Randall B. Irmis in the BENM for fieldwork. While I strongly support partnerships across all groups, I am deeply concerned that a few of the new measures to be implemented within this proposed plan will prevent the ability for paleontologists to conduct research within the Monument. (specifically 'Option E'). Without proper management, paleontological resources end up in two places: eroded away or poached by private collectors. The most reasonable way that we can protect the geologic and paleontological heritage of the BENM is through permitting professional paleontologists to conduct fieldwork and accession relevant specimens in museum collections. Otherwise, these unique fossils face a grave fate: being lost to the public forever in the hands of for-profit, commercial collectors who actively poach fossils and balk at any rules aimed at preventing such activities. I understand that museums have a colored past with natural resource management, especially with many of the tribes comprising the Inter-Tribal coalition of the BENM. As an educator at the Carnegie Museum of Natural History, I experience complicated and difficult conversations about this legacy nearly daily. Much of this legacy is tied to the exploitative, colonialist mindset of former museum workers, but I know we can do better. It is on museums and researchers to rectify our behavior and act with great respect to the land and the people that inhabit it. The team that I conducted fieldwork with in the BENM has made strides to act as leaders in the progressive realm of fieldwork. Much of their work in the BENM focuses on rural community education (see NSF EAR 2219902), so as to bolster relationships with the communities within and surrounding the monument. With this context, I strongly recommend that Option E be replaced with Option A in the management plan. Without these changes, the paleontological heritage of the BENM will be left to erode away or be poached by illegal, for-profit collectors.	PALEOGE003-Paleo, ALT05-Alternative E	Under the Proposed Plan in Section 2.4.4.3, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
8677-13	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg ES-11, paragraph 1: This section states Alternative E would provide the most protective management for paleontological resources This statement is only true if significant fossils can be collected under a valid research permit and curated in a federally approved repository, as per sections 6304 and 6305 of PRPA. Collection and curation are the only way to protect and preserve most	PALEOGE003-Paleo, ALT05-Alternative E	Under the Proposed Plan in Section 2.4.4.3, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with

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			significant fossils; if left on the surface, they will be progressively damaged and destroyed by weathering and erosion. Pg ES-11, paragraph 1: This section states that Alternative E would separate the public from paleontological resources. Under US law, paleontologists are the public. Keeping permitted paleontologists separate from paleontological resources would be inconsistent with the BLMs and USFSs obligation to manage these resources using scientific principles and would not adhere to the directives set out by the PRPA, 43 CFR Part 49, and 36 CFR Part 291.		specific stipulations for excavation. The statement on barriers or other methods has been updated to emphasize protection of paleontological resources from impacts, not separation from the public.
8677-18	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 2-70, Table 2-16, row 1: Under Alternative E, Protection and preservation of paleontological resources should be added to this list. In cases where prescribed burns are used to modify vegetation, the area should first be surveyed for paleontological resources by qualified paleontologists; if significant resources are located, they should be mitigated and collected where necessary. Such decisions should be made in consultation with the agencies qualified paleontologists, consistent with the duty to manage these resources using scientific principles and expertise (see above).	PALEOGE003-Paleo, ALT05-Alternative E	Prior to implementation of a prescribed fire, site specific NEPA would be completed, which may include a survey for paleontological resources. In the Proposed Plan, paleontological surveys would be conducted in areas with a PFYC Class of 3, 4, 5 or U for discretionary actions. Agencies would consider mechanical tool excavation on a case-by-case basis, which will involve site specific NEPA analysis to ensure impacts have been considered. Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.
F10-1			I am concerned about the RMPs' stance on fossil collecting, and would prefer to support any option that includes permitted fossil collection for scientific research, museum exhibition and public education and outreach. Permitted collection and curation by qualified paleontologists is the only way to ensure that fossil resources are preserved for scientific research and educational purposes. 'Option E' should be modified with the 'Option A' language in the paleontological resources section. This will allow fossils to continue to be studied, excavated, enjoyed, and enhanced by the Traditional Indigenous Knowledge that tribes have about so many of the resources within the BENM region. only option a protects permitted paleontological collection as stipulated within the paleontological resources protection act and the presidential proclamations establishing and restoring bears ears national monument.	PALEOGE003-Paleo, ALT05-Alternative E	Under the Proposed Plan in Section 2.4.4.3, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation.
16784-14	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	SVP is fine with any alternative that would allow flexibility: 1) for surface disturbances to protect BENM objects, where objects would include scientifically significant paleontological resources that may be removed from such areas for their protection and preservation; and 2) for using of mechanical tools (including hand tools, jackhammers, and rock saws) for extractions of scientifically significance paleontological resources on a case-by-case basis. SVP asks that any decision-making should be made in consultation with the agencies qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	PALEOGE003-Paleo, ALT07-Modification of Existing Alternatives	Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources. The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study.
16784-33	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Regardless, SVP asks that any decision-making about geology or minerals should be made in consultation with the agency's qualified paleontologists in the region. In fact, we recommend the need for consultation with the agency's qualified paleontologists to be added as one of the items in any of the alternatives that will be adopted in the Final RMP to ensure that such important consultation will not be inadvertently missed because paleontological resources inherently occur within the geologic context.	PALEOGE003-Paleo, ALT07-Modification of Existing Alternatives	Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources. Agencies will follow all applicable laws, including PRPA.
17617-1	Joe Neuhof PO Box 338 Bluff, 84512	Bears Ears Partnership	We agree with the recommendations brought forward in Appendix L that allows for paleontological collection that would be by permit only, that tribal nations would be allowed to collect petrified wood, and that special permits would be issued for collection by tribal members. Prohibiting collecting would essentially make it impossible to inventory paleontological resources, study them, use them for education, or even to protect them in the ways that the Proclamation stipulates. BEP strongly recommends that paleontologists should, by permit, be able to collect and study paleo resources in order to understand and protect them as an object and value in the Proclamation.	PALEOGE003-Paleo, ALT07-Modification of Existing Alternatives	Under the Proposed Plan in Section 2.4.4.3, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. Under the Proposed Plan, the agencies would also develop a paleontological resource implementation plan within five years which would include education and outreach to local communities.
17713-1	Xavier Jenkins		As an SVP member, I am concerned about the RMPs' stance on fossil collecting and would prefer to support any option that includes permitted fossil collection for scientific research, museum exhibition and public education and outreach. Permitted collection and curation by qualified paleontologists is the only way to ensure that fossil resources are preserved for scientific research and educational purposes. Furthermore, BENM bears much untapped potential and the Permian rocks there are soon to be a 'world class' resource for the entire field of paleontology due to recent, soon to be published, work. This work would not be possible under current schemes, and I urge editing these options to included permitted paleontological collection.	PALEOGE003-Paleo, ALT07-Modification of Existing Alternatives	Under the Proposed Plan in Section 2.4.4.3, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. The Proposed Plan also has a paleontological resource implementation level plan which would include education and outreach to local communities and would be completed within 5 years.
7339-6			Paleontologists should, by permit, be able to collect and study paleo resources in order to understand them and protect objects and values in the Proclamation.	PALEOGE003-Paleo, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see Section 2.4.4.3). See Section 3.4.1.2 for a discussion of impacts of management regarding paleontological resources to paleontological resources.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
830-1	Howard Corneli		I write to strongly support a management plan for Bears Ears National Monument that allows careful exploration and collection by qualified paleontologists under a permitted and monitored system.	PALEOGE003-Paleo, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see Section 2.4.4.3). See Section 3.4.1.2 for a discussion of impacts of management regarding paleontological resources to paleontological resources.
8677-16	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 2-17, Table 2-6, row 1: For all alternatives, in cases where prescribed burns are used to modify vegetation, the area should first be surveyed for paleontological resources by qualified paleontologists; if significant resources are located, they should be mitigated and collected where necessary. Also, some permitted fossil collection requires the use of mechanical tools. In these cases, the management plan should allow flexibility for allowing mechanical tool-aided disturbance while protecting both botanical and paleontological resources. Such decisions should be made in consultation with the agencies qualified paleontologists, consistent with the duty to manage these resources using scientific principles and expertise (see above).	PALEOGE003-Paleo, ALTO7-Modification of Existing Alternatives	Prior to implementation of a prescribed fire, site specific NEPA would be completed, which may include a survey for paleontological resources. In the Proposed Plan, paleontological surveys would be conducted in areas with a PFYC Class of 3, 4, 5 or U for discretionary actions. Agencies would consider mechanical tool excavation on a case-by-case basis, which will involve site specific NEPA analysis to ensure impacts have been considered. Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.
8677-17	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 2-35, Table 2-8, row 1: This table is unclear as to how the management guidelines for each alternative will affect paleontological resources. All alternatives should allow paleontological survey, permitted collection, and mitigations in lands with wilderness characteristics, on a case-by case basis. Some permitted fossil collection requires the use of mechanical tools. In these cases, the management plan should allow flexibility for allowing mechanical tool-aided excavation and collection. Such decisions should be made in consultation with the agencies qualified paleontologists, consistent with the duty to manage these resources using scientific principles and expertise (see above).	PALEOGE003-Paleo, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan in Section 2.4.4.3, collection and curation of paleontological resources is allowed by permit only in certain cases as determined by the agencies in consultation with the BEC, with specific stipulations for excavation. Agencies would consider mechanical tool excavation on a case-by-case basis, which will involve site specific NEPA analysis to ensure impacts have been considered. Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.
8677-19	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pgs 2-73 to 2-79, Table 2-18: Expanded ROW access makes it easier for people to intentionally or unintentionally damage cultural and paleontological resources. Therefore, NHMU prefers alternatives that do not create new ROW access. If any new ROW corridors are created, the area should first be surveyed for archaeological and paleontological resources by qualified archaeologists and paleontologists; if significant resources are located, they should be mitigated and collected where necessary. Such decisions should be made in consultation with the agencies qualified archaeologists and paleontologists, consistent with the duty to manage these resources using scientific principles and expertise (see above).	PALEOGE003-Paleo, ALTO7-Modification of Existing Alternatives	Prior to implementation of a surface disturbing discretionary activity, including ROWs, site specific NEPA would be completed, which may include a survey for paleontological resources. In the Proposed Plan, paleontological surveys would be conducted in areas with a PFYC Class of 3, 4, 5 or U for discretionary actions. Under the Proposed Plan, ROW Open areas would be along major highways within the BENM. See Section XXX for a discussion of impacts on paleontological resources from ROWs.
3125-4	Steve Knox		Page 2-15, 2.4.4, Paleontological Resources, Table 2-3, 2020 ROD/MMP, Shay Canyon, Alternative E this alternative allows hardening of trails in Shay Canyon to mitigate impacts to significant paleontological resources. Shay Canyon, however, appears to be located in an area proposed for management of its wilderness characteristics (LWC). Hardening trails would be inconsistent with managing an area for wilderness characteristics. You should prescribe another mitigation approach more appropriate on lands being managed for their wilderness characteristics.	PALEOGE003-Paleo, ALTO7-Modification of Existing Alternatives, LWC01-General	Under the Proposed Plan, Shay Canyon ACEC would not be managed to protect wilderness characteristics. See Section 2.4.10.3 for special management actions related to Shay Canyon ACEC.
16784-24	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP states, Traditionally, the BLM and USDA Forest Service have measured fossil condition with a single indicator: Are fossils in collections or the field in good condition? This statement and the paragraph containing it are difficult to understand. In our experience, BLM and USFS do not routinely assess the condition of paleontological resources. Rather, they use scientific methods, sometimes in collaboration with non-governmental scientists, to inventory paleontological resources, classify them using the PFYC scheme, to prioritize them for mitigation, conservation, and scientific study. The condition of a fossil is not directly related to its scientific value to our knowledge. We recommend this section be rewritten under the direction of qualified BLM and USFS paleontologists.	PALEOGE003-Paleo, DATA02-Inadequate Methodologies	The agencies have updated the Proposed Plan and removed this statement from the affected environment.
16784-26	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP states, Additionally, Tribal values prioritize the remains of ancient beings staying in situ (see Appendix L). This statement contradicts what is said in the proposed management plan from BEC given in Appendix L that says [c]ollection of paleontological objects will be by permit only. Tribal Nations of the BEITC have traditional uses for petrified wood. Special permits should be granted for collection by tribal members (Appendix L-C, p. 8), which should be substituted here. As described above, there are some instances where resource management would be facilitated by leaving fossils in situ but a blanket prohibition on collection is incompatible with provisions in all the alternatives in this draft RMP and with Proclamation 10285.	PALEOGE003-Paleo, DATA02-Inadequate Methodologies	The agencies considered the public comment. Under the Proposed Plan, in-situ casting would be by permit only and the casting and collection of paleontological resources would only be done in collaboration with the BEC, on a case-by-case basis, and subject to stipulations. Agencies would look to minimize collection and curation of fossils and would only consider collection in certain cases (see the Paleontological Resources Section in Chapter 2). See Natural Environment Section in Chapter 3 for a discussion of impacts of management regarding paleontological resources to paleontological resources. The Paleontological Resources Section in Chapter 2 includes a goal and objective to foster public awareness and appreciation of the paleontological heritage. Additionally, The Paleontological Resources Section in Chapter 2 includes a management action common to all action alternatives that would provide for the protection of paleontological resources and the protection of BENM objects while providing public access to those resources for scientific education and study. Please see changes in the Proposed Plan in Appendix N.1. The statement regarding Tribal values has been updated in the analysis.
16784-4	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Page ES-2: In the Executive Summary (ES-2), it states 5. Protect important paleontological resources. While SVP is delighted to see paleontological resources being recognized as a significant component of BENM, if the statement will be used also in the Final RMP, we prefer it to be rephrased as 5. Protect, preserve, and manage scientifically significant paleontological resources where the addition of the words preserve and manage will be consistent with the mandates required by the	PALEOGE003-Paleo, DECI07-Compliance with other laws and policies	Proclamation 10285 states that the agencies will "protect" BENM objects. The Executive Summary has been updated to include "scientifically" important paleontological resources.

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			Paleontological Resources Preservation Act (PRPA) of 2009 (Public Law 111-11, Subtitle D: 16 USC 470aaa). Although the phrase scientifically significant is appreciably slightly vague, it is far more specific than merely important.		
16784-17	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	If and when the management of paleontological resources overlaps with tribal stewardship, trained and qualified paleontologists should be consulted so that the significance of tribal cultural heritage can be further enhanced also to encompass scientific significance, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	PALEOGE003-Paleo, DECI07-Compliance with other laws and policies, ALT05-Alternative E	See changes in the Proposed Plan based on the collection of Paleontological Resources (Section 2.4.4.3). Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.
16784-20	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	SVP prefers alternatives that would retain BLM lands as public land, particularly areas with the Potential Fossil Yield Classification (PFYC) rating of 4 or 5, and does not prefer those that consider land withdrawals. If land withdrawals are considered, the decision should be made in consultation with the agency's qualified paleontologists in the region. Retention of public lands by BLM or USFS will ensure the protection, preservation, and management of paleontological resources under the Paleontological Resources Preservation Act of 2009. SVP asks that any decision-making should be made in consultation with the agency's qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	PALEOGE003-Paleo, DECI07-Compliance with other laws and policies, LAND01-General	Proclamation 10285 withdrew BENM from all forms of entry, location, selection, sale, or other disposition under the public land laws or laws applicable to the BLM and USDA Forest Service from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of BENM. See Section 2.4.3.3 and 2.4.19.2, Management Actions Common to All Alternatives.
16784-28	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	RMP in reference to recreationists encountering fossil resources states, this public discovery and proper handling of 3-16 paleontological resources would rely on BLM-supported or USDA Forest Service supported community engagement and education on the preservation of the resource, along with collaboration with the BEC and holders of Traditional Indigenous Knowledge regarding the values of these resources. SVP suggests adding along with paleontologists as the final clause of this statement. As mentioned above, scientific knowledge can act in concert with Traditional Indigenous Knowledge to provide a richer view of the natural world.	PALEOGE003-Paleo, REC01-General, ALT07-Modification of Existing Alternatives	Agencies would work with qualified agency paleontologists on all decisions regarding management of paleontological resources.
17601-6	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	MINERAL EXTRACTION It is important to note that despite the withdrawal of federal locatable minerals under the Mining Law of 1872 as outlined in Section 2.4.3 of the RMP/EIS, TLA retains both the ability and duty to lease its lands for mineral extraction. This includes the extraction of sand and gravel, lithium, uranium, and oil and gas on the lands it manages within the boundaries of BENM. This responsibility is crucial to fulfill TLA's mandate to generate revenue for Utah's public schools and other beneficiary institutions.	PALEOGE004-Geology	Thank you for your comment.
7764-1	Lee Rimmer		Energy production and research for oil and gas has effected here too. This energy boom has ended, we hope. Yet some sites are in danger. Some sites such as the uranium sites, are still hazardous to the health of humans, plants and wildlife. Rich quality uranium resources exist nearby. We must work so that these dangerous sites are never used again! The old and gas industry knows that there are deposits of tar sands exist here too. Yes these sites are buried deep under White Canyon. Yes, these sites are remote. But their development is could be devastating. We need new protections are needed here to make sure these tar sands, the dirtiest form of oil on earth, remains in the ground. While our Coalition is not opposed to energy development, we believe the Bears Ears area is too valuable to drill for temporary economic gain. We should not sacrifice this place for the extraction of the low-quality energy and mineral resources. The Bears Ears region deserve permanent protection. A protective designation for the area would protect the unrivaled landscape and irreplaceable cultural and historic resources here from future mineral and energy development. I do not think that the existing rights for mining and energy development should be developed within the proposal area. We must leave that behind us, and go to solar, wind, and geothermal as our energy sources.	PALEOGE004-Geology, ALT07-Modification of Existing Alternatives	Proclamation 10285 withdrew BENM from all forms of entry, location, selection, sale, or other disposition under the public land laws or laws applicable to the BLM and USDA Forest Service from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of BENM. See Section 2.4.3.3 and 2.4.19.2, Management Actions Common to All Alternatives. For more information pertaining to current conditions and mitigation for geology and mineral resources see Appendix N, Section 3.4.1.

Table U-21. Public and Stakeholder Involvement

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19001-1	Bruce Lyman bjlyman61@gmail.com		According to the proclamation, the Secretary of the Interior shall provide maximum public involvement in the development and implementation of the management plan, including federally recognized Tribes and State and local governments. This has not happened. As I have spoken with local city and county leaders they have not been invited to the weekly meetings as this document has been developed. Neither have representatives from agriculture, natural resources, recreational users or other users. This has led to an extreme bias in this management plan. While many of these entities have been listed as Cooperating Agencies they have had little to no input. It also appears that more non-cooperating tribes helped compile the Management Plan than cooperating agencies.	PUBL01	The public comment process is consistent with NEPA as required by federal law. The agencies held multiple meetings with cooperating agencies throughout the planning process, attended by local and state governments and other federal agencies. See the Consultation and Coordination appendix for further details and updates in the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19040-2	John Redd mitchredd@gmail.com		In summary, I disagree with designating one group of stakeholders as having primacy over the other stakeholder groups in the resource management decision-making process. It effectively names the BEITC as the decision maker (I would voice this concern if any of the various stakeholders were granted this level of power in this process). In this case, the BEITC will decide which issues will be included or excluded from discussion, what information or facts will be included or excluded in the analysis, and then ultimately, the decision and course of action, with every other stakeholder group relegated to minor or insignificant roles in the process. If the goal is to work together to optimize the resource management decision making process and to address all stakeholders' priorities, this approach is doomed to failure. I would like to see a decision process established with the understanding that the goal is to optimize all stakeholder groups' priorities. I understand that each group will get less than 100% of their chosen priorities but more than 0% of those priorities. Once all stakeholders clearly understand this, I am confident that clear heads will prevail, and an optimal path can be charted. A key byproduct of a successful approach will be an increased level of engagement by the various stakeholders. If each feels they have a voice and can impact the process, the level of participation will increase and hopefully open the door to creative solutions to issues. If one group of stakeholders is given primacy over all other groups, over time, it will reduce engagement by the existing stakeholders and lead to increased frustration and anger.	PUBL01	The land use planning process includes analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Service's cooperative agreement with the BEC. These regulations require coordination and consultation with interested publics and governmental agencies. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Proclamation 10285 re-establishes the BEC and directs the agencies to meaningfully engage with the Commission, including through the planning process, in order to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations. The agencies held multiple meetings with cooperating agencies throughout the planning process, attended by local and state governments and other federal agencies. In addition the agencies held multiple public meeting and met with stakeholders as a part of the Section 106 process. See the Consultation and Coordination appendix for further details and updates in the Proposed Plan. The agencies retain final decision-making authority.
19017-17	Sylvia Stubbs	San Juan County	p. 2-82 Route Re-evaluations In the Outback and Remote Zones it is unclear what is meant by "Designated routes would be re-evaluated through future implementation-level travel planning ... ". Nearly all of the designated routes listed for re-evaluation are major roads accessing various parts of the Monument. These roads serve recreational as well as Native American access needs in addition to being an essential part of the County's transportation network. We suppose it is a given that all roads, regardless of how well used and important they may be, would be subject to evaluation in implementation-level travel planning. However, listing all major roads in this planning document is redundant and unnecessary unless a specific undisclosed purpose to do so is intended. Please clarify why this is included in this alternative. Likewise it is a given that State and local governments should be included in any re-evaluations of roads and these governments should be listed for inclusion in any route re-evaluation exercise.	PUBL01; TRAVEL01	In the Proposed Plan, the direction for the Outback and Remote Zones has been edited regarding the implementation-level travel planning. The travel planning process will be a public process and include opportunities for the public to participate regarding specific routes.
19017-23	Sylvia Stubbs	San Juan County	AU Action Alternatives: Any travel restrictions considered must also be coordinated with State and County governments.	PUBL01; TRAVEL01	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
19017-25	Sylvia Stubbs	San Juan County	p. 2-124 Modifications of Roads for Wildlife Alternative E: In any consideration for adaptation of trails, roads and OHV routes to allow wildlife movement, Utah Division of Wildlife Resources, County and State governments must be included along with the SEC and Tribal Nations.	PUBL01; WILDFISH01	See the Wildlife and Fisheries Section in Chapter 2 for management related to deer winter range and bighorn sheep lambing and rutting areas. Under the Proposed Plan, continued monitoring of bighorn sheep priority habitat, connectivity corridors, population size, health, long-term viability, and conflicts with surface-disturbing activities would proceed in collaboration with the BEC, Tribal, State and agency programs. This includes monitoring of the five mesa tops and other existing and potential bighorn sheep habitat sites. The section provides management actions for habitat for all wildlife, not only special status species. In the Proposed Plan in the Inventorying, Monitoring, Science, and Indigenous Knowledge section, agencies will collaborate with the BEC, Tribal experts recognized by Tribal Nations, and applicable federal and state agencies, in inventorying and monitoring of wildlife habitat (including but not limited to hiding cover, migration routes, and connectivity), and culturally important wildlife. Maps of wildlife habitat are provided in Appendix A. IM 2023-005 directs the BLM to consult with state fish and wildlife agencies and Tribes to assess habitat connectivity in order to manage as best as possible for intact, connected habitat.
16068-1	Anthony Wojcik	American Legion Post #97	I feel strongly that a commission of local, multi-generational residents of San Juan County should also be consulted and used in the very same fashion and way as the BEC, not only to develop the original BENM management plan, but to sustain and alter the plan as needed going forward.	PUBL01-Public and Stakeholder Involvement	There are opportunities for input as consistent with the National Environmental Policy Act. The planning effort included multiple opportunities to provide input and attend public meetings during scoping and when the draft was open for public input. Citizens can also engage with local government officials who represent them and attend the Monument Advisory Committee Meetings and provide public comments there.
16994-3	Susy Ellison		First and foremost, I feel that implementation of this plan should not be delayed once it is finalized. Tribal leadership must be included in all aspects of the management process including travel, cultural resource management and protection, and administration of the river corridor.	PUBL01-Public and Stakeholder Involvement	Section 2.4.2.2 of the Draft RMP/EIS describes the tribal co-stewardship that would occur under all action alternatives. Implementation of the plan will begin once the record of Decision is finalized, but the Resource Management Plan is intended to provide guidance to the agencies on how to manage BENM for the future.
17977-1	Ronald Normandeau		I understand there are eighteen (18) airstrips in the Bears Ear National Monument. My suggestion to the BLM is: Ask the pilot associations participating in the planning process to evacuate the 18 airstrips for the highest level of recreation assets and the selections be airstrips that provide the best distribution across the Rears Ear NM area without competing with road access. The number could be in the realm of 8 to 10 airstrips. The object being to consider airstrips as important an access as a road or trail.	PUBL01-Public and Stakeholder Involvement	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on USFS managed lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the USFS portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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18262-2	Doreen Bird		Also, this is not a culturally appropriate means of soliciting public comment from my people who are the ancestral owners and stewards of the land.	PUBL01-Public and Stakeholder Involvement	The public comment process is consistent with NEPA as required by federal law. Chapter 4 of the RMP/EIS describes additional outreach that was conducted with Tribes and additional public outreach completed.
9255-1	Keith Alleman		Whenever a draft product is followed by a public comment period and then a revised draft or final product is produced, the follow-on product should include a section that discusses how it was influenced by the feedback gained from the comment period. Such a section should include specifics; it is not enough to insert some pro forma language about a comment period being held and informing the priorities and strategies in the final EIS or RMP. There should be specific examples, using phrasing such as "Public comments identified resources for higher protection. For example, in the absence of public comment, Alternative D would have retained Trail X-874 for motorized use. Public comment noted that the trail passes proximate to important archeological sites, which was taken into account as BLM now proposes to adopt Alternative D with the modification to actively decommission Trail X-874." Or, "BLM has selected Alternative B. However, in response to public comments highlighting the ecological importance and precarity of Shay Canyon, Shay Canyon ACEC will continue to be managed as an ACEC." Or, "Public comments identified editorial errors in the draft that have been rectified in this document, such as erroneous listings of trail lengths or designators (e.g., text referring to 'Trail X-884' when 'Trail X-874' was intended." If no specific change from the draft to the final product can be reasonably attributed to the public comment period, then say so. Say somewhere that an extensive public comment period was held and feedback generally was considered but no specific changes to the document were attributable to the feedback received.	PUBL01-Public and Stakeholder Involvement	This appendix to the Proposed RMP and Final EIS includes a comment response report with responses to all substantive comments received during the comment period for the Draft RMP/EIS.
17357-5	Audrey Glendenning	Great Old Broads for Wilderness	Finally, the final plan should set clear expectations and guidelines for continued collaboration with the BEITC during plan implementation. The preparation of this plan has been a historic step forward, and providing clear directions that mandate collaboration is a way to ensure this progress and momentum continues. For example, Alternative E does not outline a formal process for BEITC to participate in the designation of Areas of Critical Environmental Concern (ACECs) within the Monument. Processes like that should be clarified in the final plan.	PUBL01-Public and Stakeholder Involvement, ALT05-Alternative E	The agencies are committed to continued co-stewardship of BENM with the Bears Ears Commission.
18965-9	Simone Griffin	BlueRibbon Coalition	BRC has grave concerns with the proposed alternative, Alternative E. This alternative is extremely vague as it stands which makes it impossible for the public to provide public feedback which is a direct violation of NEPA. The preferences the BLM is giving within this plan to Bears Ears Intertribal Coalition / Bears Ears Commission will unconstitutionally restrict public access to public lands primarily on the basis of Native American religious beliefs, in violation of the Establishment Clause of the First Amendment. Giving preferential treatment and exclusionary access to one tribe, tribes or group based solely off of religious beliefs is a violation of the First Amendment. It is imperative to note that the local Navajo Chapter in Blanding passed a resolution opposing the Bears Ears National Monument. Clearly, not all indigenous voices are created equal according to Alternative E.	PUBL01-Public and Stakeholder Involvement, ALT05-Alternative E	The Proposed Plan is consistent with applicable laws and regulations.
18987-4			Page 3-429 states: The management outlined in Alternative E is centered on the perspective of the Tribal Nations of the BEC, who do not view many forms of recreation as an appropriate use of the BENM cultural landscape (BEC 2023). This statement in this Alternative is very concerning. The agencies have committed to ensuring that the existing use of recreation continues as part of the monuments management. The agencies should take a balanced approach and not entirely center the management of the monument on the perspective of the Tribal Nations. All perspectives need to be considered and incorporated, including those of recreationists.	PUBL01-Public and Stakeholder Involvement, ALT05-Alternative E	The agencies would follow applicable law and conduct analysis and involve the public, consistent with Federal Law, when considering closures of public lands. See the Recreation and Visitor Services section of the Proposed Plan for clarification to the language around rest and closures. The agencies considered input from members of the public, stakeholders, cooperating agencies, and the Bears Ears Commission.
15209-1	Carson Halls UT		I feel strongly that a commission of local, multi-generational ranchers and farmers should also be consulted and used in the very same fashion and way as the BEC, not only to develop the original BENM management plan, but to sustain and alter the plan as needed going forward.	PUBL01-Public and Stakeholder Involvement, ALT07-Modification of Existing Alternatives	There are opportunities for input as consistent with the National Environmental Policy Act. The planning effort included multiple opportunities to provide input and attend public meetings during scoping and when the draft was open for public input. Citizens can also engage with local government officials who represent them and attend the Monument Advisory Committee Meetings and provide public comments there.
16988-7	Andy Blair 1690 East 2000 South Driggs, 83422	The National Outdoor Leadership School (NOLS)	Inclusive Decision-Making: Ensure that the voices of all stakeholders, particularly Indigenous communities, continue to be heard and integrated into the RMP. This includes formal agreements that outline roles and responsibilities.	PUBL01-Public and Stakeholder Involvement, ALT07-Modification of Existing Alternatives	Chapter 4, Consultation and Coordination, describes the process by which input from various stakeholders is incorporated into the RMP/EIS.
9189-3	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	From your website: The Bureau of Land Management and U.S. Department of Agriculture Forest Service are seeking public input on a draft plan to guide management of the Bears Ears National Monument, incorporating considerable input from the Bears Ears Commission, the State of Utah, other cooperating agencies, and the public. The agencies are committed to ensuring that existing uses of cattle grazing, recreation and traditional gathering of firewood and plants continues as part of the monuments management. Here, the RMP lays out the special interests that have had an inside track in developing this RMP with the public coming last. For example the agencies are committed to ensuring that existing uses of cattle grazing, recreation and traditional gathering of firewood and plants continues as part of the monuments management. Without analyzing the conditions on the ground, it is automatically assumed that uses by these powerful interests will not be changed no	PUBL01-Public and Stakeholder Involvement, ALT07-Modification of Existing Alternatives	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. Additionally, Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process.

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			matter the level of degradation and damage they cause. These are public lands and are part of the public trust. They belong to all Americans, not livestock permittees, recreation interests, local counties, or tribes. While the tribes have a connection to the land, so do many of us who have spent our time and money visiting and documenting the damage caused by these special interests. As an ecologist and naturalist, I have an intimate understanding of the functioning of these ecosystems and a deep love of the land and nature. I also am gratified that the BEC indicates wildlife and natural values are of the highest priority but that is belied by the quote cited above. Clearly wildlife and natural values are not a priority, but maintaining existing exploitation is a priority. Why would my views and knowledge not be as important as anyone else? The RMP is wholly biased in this regard.		
18677-9	Benjamin Bellorado Tucson, AZ		The BLM and NFS should work with professional archaeologists and educational organizations to create a board selected from the professional archaeological community who are familiar with the local resources, preservation/conservation experts, and indigenous cultural experts from the descendant communities in the area to provide comments and guidance on the best modes, messaging, and content of public outreach related to the monument. We are not all interchangeable. Along with, and in conjunction with efforts to include tribal nations as co-managers of the monument, the professional archaeological community must be represented. They should also be valued as an important community of stakeholders in management decisions and the dissemination of interpretation of cultural heritage in the area. To put it plainly, it is essential for archaeologists to have a seat at the table for consequential management decisions and the individuals in these roles need to have a proven history of peer-reviewed research and publication, as well as documented experience on the ground in the area.	PUBL01-Public and Stakeholder Involvement, ARC01-General	The agencies are consulting on the effects of the plan on historic properties. As a part of this consultation under Section 106 of the NHPA, the agencies invited multiple stakeholders who have an interest in cultural resources. This includes the Utah State Historic Preservation Officer, the Advisory Council on Historic Preservation, local governments, nonprofit organizations, Tribal Nations, and avocational archaeological groups. The agencies welcome input via the Section 106 process and will continue to work with consulting parties on implementation plans, consistent with federal law. Organizations or individuals that have expertise or knowledge of cultural resources can participate in the process and the agencies consider requests to be involved. See the linked PDF for more information https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf
866-1	Wendy Lessig	Recreational Aviation Foundation	I would like to submit a kml file of the airstrips located within the BENM which can be viewed on Google Earth, but ePlanning does not accept kml files. There does not seem to be an email option for the public to submit a comment on the BENM draft RMP. If the BENM management staff would reach out to me at my email address listed in this public comment, I will be happy to promptly send the kml file of the airstrips in the BENM.	PUBL01-Public and Stakeholder Involvement, ATTN07-Request for documents or information	Thank you for this information. The agencies received and reviewed the submission
12746-16	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The complete omission of analysis of cultural resources is directly contrary to the Proclamation specifically requirements of maximum public involvement in the Process to develop the Plan. This maximum public involvement requirement is specically stated as follows: The Secretaries shall provide for maximum public involvement in the development of that plan, including consultation with federally recognized Tribes and State and local governments. In the development and implementation of the management plan, the Secretaries shall maximize opportunities, pursuant to applicable legal authorities, for shared resources, operational efficiency, and cooperation. ¹⁷ This additional specific requirement of maximum public involvement in planning becomes immensely problematic as basic information required for NEPA, the Antiquities Act or APA is not provided at legally sufficient levels. Even without the Proclamation, the Antiquities Act requires many values permitted in the planning area to be analyzed in the legally required manner. These requirements are expanded with the maximum public engagement requirements of the Proclamation and not reduced or removed. Rather than maximizing public engagement on these designations, the Proposal provides no information at all despite the standards being entirely new to planning requirements.	PUBL01-Public and Stakeholder Involvement, DATA01-Analysis Methods and Data, CUL01-General	Chapter 4 of the RMP/EIS provides consultation, coordination, and public involvement meetings held during the RMP/EIS planning effort. Appendix O provides detailed description of the consultation, coordination, and public involvement efforts during the RMP/EIS planning effort.
9257-1	Gail Johnson		The designation of the Bears Ears Monument affects a number of groups including but not exclusively the Native Americans. It affects ranchers, hunters, those who recreate, those concerned about conservation, and those concerned about our cultural/spiritual preservation. Because it affects all of these groups it seems reasonable that they should all be involved in administering the Bears Ears Management plan. As it stands it appears that the ultimate decision making process lies with one group. I would like to see all affected groups involved in the process. Everyone wants and should have a voice in decision making. Management of the Bears Ears Monument can and should be shared by all affected. Please make this change which I believe will lead to greater cooperation and the best solutions in problem solving. Lastly, the Bears Ears territory is one of the most beautiful areas in Utah. It should be shared by everyone not restricted to a few	PUBL01-Public and Stakeholder Involvement, DECIO1-Decision Process	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. Additionally, Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process.
12746-17	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The Antiquities Act of 1906 (54 U.S.C. 320301-320303) authorizes the President to proclaim national monuments on federal lands that contain a wide range of historic landmarks, historic and prehistoric structures, or other objects of historical or scientic interests and other values. At no point does the Antiquities Act allow planners to avoid NEPA compliance in identifying other values and their relationships to uses in the Monument. The Proposals omission of cultural resources analysis has been catastrophically destructive to use of other values identied in the Proclamation, such as recreational values. NEPA requires analysis on how the competing values are balanced and this has simply not occurred with management of cultural resources in relation to other values identied in the Proclamation. Providing an alternative that has little chance of adoption in NEPA from a partner group is not a replacement for meaningful public engagement as this alternative is only one of ve alternatives provided.	PUBL01-Public and Stakeholder Involvement, DECIO7-Compliance with other laws and policies, CUL01-General	Cultural resources are considered in detail in the Cultural Resources section in Chapter 3, including impacts of recreational uses on cultural resources.

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18990-9	Clif Koontz		Collaborative efforts by the Lead Agencies should remain faithful to the congressional directive of public lands to benefit the public as a whole. Statutory and regulatory authorities recognize the roles of States, Local Governments and Tribes as the entities to represent the public interest, particularly in the administrative phase of a NEPA process. Yet with the BENM DRMP/EIS, the Bears Ears Commission (BEC) have abrogated center stage in the process, the BEC have been blindly following the recommendations of a private nonprofit group called Bears Ears Inter-Tribal Coalition (BEITC), whose positions are completely in line with the wilderness-expansion groups that share the same funding sources, and the BEITC have essentially captured the Lead Agencies in that the DRMP/EIS carries forward the BEITC LMPs emphasis on a holistic approach to all resources that gives primacy to indigenous knowledge and perspective on the stewardship of the Bears Ears landscape. The legal failing with this slow-walked accretion of BEC and BEITC influence and control by winks and by nods, is to unlawfully marginalize and squeeze out the time-honored, warranted, and rightful statutory and regulatory based roles and input of the State and County coordinating and cooperating partners in the Planning Area, as well as that of other important public stakeholders, such as the Organizations.	PUBL01-Public and Stakeholder Involvement, DECI07-Compliance with other laws and policies	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. Additionally, Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process.
17015-5	Kestrel Kunz	American Whitewater	As part of a thorough and holistic approach to water protections, eligible Wild and Scenic Rivers in the planning area need to be thoroughly assessed without relying solely on previous agency decisions. Proclamation 10285 states that for purposes of protecting and restoring the objects identified above and in Proclamation 9558, the Secretaries shall jointly prepare and maintain a new management plan [emphasis added] for the entire monument. One of the primary differences between previous BLM and USFS land management plans and the Bears Ears RMP is the commitment to Tribal co-management. Tribes and other stakeholders should have the opportunity to weigh in on a new Wild and Scenic River eligibility process that is completed in the context of Bears Ears National Monument, Tribal co-management, and the important values of the landscape.	PUBL01-Public and Stakeholder Involvement, WAT01-General	Thank you for your comment. The affected environment section in the Wild and Scenic Rivers section in Appendix N provides more information regarding the re-evaluation criteria. For example, the following can be found in the section: "The BLM has reviewed current data and policy criteria for additional assessment of eligible rivers and determined that no new circumstances warranted reevaluation of previous determinations on WSR suitability."
19035-5	Gail Johnson		4. Alternative E is not a good alternative because it prioritizes one group over other groups. It is not out of racial animus that I say this, but out of a concern for fair and equal treatment for all users. The proclamation declares that the "entire landscape" reserved by the proclamation is "an object of historic and scientific interest in need of protection ... " It also states " ... the preservation and restoration and protection of the objects of scientific and historic interest on the Bears Ears region, including the entire monument landscape ... " Livestock grazing is a "historic interest" because of its long history in this area. It is entitled to protection. It is part of the monument's landscape. The proclamation also states that the Bears Ears Commission shall give "guidance and recommendations ... " The proclamation does not give co-management status to the BEC with the federal agencies. It does not grant veto power to the BEC. Yet, this management plan does, especially in Alternative E.	PUBL02	Non-Indigenous historical connections to the BENM area are presented in detail in the Historic Resources section. See Management Actions Common To All Action Alternatives in the Cultural Resources section) that notes the importance of non-Indigenous cultural resources within BENM. The Proposed Plan is consistent with the Antiquities Act, Proclamation 10285, and the protection of the objects identified therein. The proclamation states that grazing is a historical use by indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
19041-5	Don Holyoak	SE Utah Grazing Improvement Program	When monitoring vegetation, resources, or doing anything that affects a grazing area, the permittee is entitled to have an objective, qualified and experienced range conservationist gather the information and make decisions. The SEC should only be allowed to give recommendations, as stated in the proclamation. They should not be given authority to manage the grazing permit. The BEC has shown its bias against grazing. They have identified grazing as a "threat to the monument" and BEC members have made public derogatory comments about grazing in the monument. Permittees have years of work and money invested in these grazing lands and should not be subjected to the biased and subjective agenda of the BEC.	PUBL02	Management practices for grazing include analysis under multiple federal laws including NHPA and NEPA and include involvement of multiple stakeholders. The plan does not alter those requirements. It only emphasizes inclusion of the BEC based on their role in the proclamation and the BLM and USDA Forest Service's cooperative agreement with the BEC. The permit holder is always included when making decisions about their permits. In addition, Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects, subject to existing laws and regulations. These regulations require coordination and consultation with interested publics and governmental agencies. Proclamation 10285 allows for the continuation of livestock grazing that is consistent with the proper care and management of BENM objects. The Management Actions By Alternative section in the Livestock Grazing section in Chapter 2 includes further acres made unavailable to grazing and limited to trailing only. Under the Proposed Plan, if monitoring indicates that livestock grazing is adversely impacting the protection of BENM objects, appropriate changes to livestock grazing management would be used to mitigate those impacts. Potential impacts of livestock grazing to natural resources is disclosed in Chapter 3. The Alternatives Considered by Not Analyzed in Detail section in Chapter 2 discusses alternatives considered but not analyzed in detail, including an alternative that excludes livestock grazing entirely. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
19017-6	Sylvia Stubbs	San Juan County	p. 2-18 Goals and Objectives 151 bullet statement "Collaborate with the BEC ... " leaves out grazing permittees and State agencies that should also be included in a discussion of water resources. Please add these entities to this section.	PUBL02; WAT01	Please see Management Actions Common to All Action Alternatives for the Water Resources which includes direction to collaborate with the State of Utah. Additionally, Management Actions Common to All Alternatives for Livestock Grazing includes direction to work with grazing permittees regarding their permits.

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1667-6	Molly Malone		Who is the BEC accountable do? Are there any time frames that the BEC must respond to requests by? What about appeals? How are BEC members chosen?	PUBL02-Bears Ears Commission	The Bears Ears Commission is established in Presidential Proclamation 9558, which is incorporated in Presidential Proclamation 10285 designating BENM. The agencies have executed an cooperative agreement with the BEC, which can be found at https://www.blm.gov/sites/default/files/docs/2022-06/BearsEarsNationalMonumentInter-GovernmentalAgreement2022.pdf . The cooperative agreement outlines timeframes and disagreement processes. As per Presidential Proclamation the BEC membership is composed of elected officials of the five Tribal Nations of the BEC.
11232-8	Andy Butler		Once the Resource Management Plan is finalized, it is critical that specific criteria be established for continuing cooperation between BEC and BLM/USFS in clarifying and enforcing the management plan. It is also essential that implementation of Travel, Cultural Resources, and San Juan River corridor Plans be started as soon as possible after the Plan is finalized.	PUBL02-Bears Ears Commission	The agencies are committed to our continued co-stewardship of the BENM landscape with the Bears Ears Commission with whom we will complete the identified implementation plans.
17573-19	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	However, the creation of the BEC through Executive Order and the subsequent Inter-Governmental Cooperative Agreement executed by the Agencies is legally problematic. Additionally, Congress, through FLPMA, has delegated the authority to manage public lands to the Agencies with the involvement of Cooperating Agencies. Therefore, the BEC and Intergovernmental Cooperative Agreement are a violation of FLPMA.	PUBL02-Bears Ears Commission	The commenter has not explained how or why the agencies' interactions with the BEC allegedly violates FLPMA. Nevertheless, the Proposed Plan and the BLM's interactions with the BEC comply with all applicable laws and regulations.
17573-2	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Furthermore, the Agencies have completely disregarded their responsibilities under the NEPA in at least two critical ways. First, the agencies have failed to utilize a systematic, interdisciplinary approach which will ensure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision-making which may have an impact on mans environment. NEPA Section 102. The State certainly agrees that it is important for the Federal Government to work cooperatively with tribal nations. However, the wholesale deference given to the Bears Ears Coalition (BEC), an NGO created by the Proclamation, without inclusion of the scientific data and analysis to support that deference, is not within a reasonable interpretation of Section 102. Additionally, the co-management agreement signed by the Agencies and Tribal Nations that purportedly handed over management authority leading to improper deference was done without legal authority.	PUBL02-Bears Ears Commission	The Proposed Plan and the BLM's interactions with the BEC comply with all applicable laws and regulations. The Intergovernmental Cooperative Agreement expressly maintains the BLM and USDA Forest Service decision making authority for federal lands. Decision making authority has not been "handed over" to Tribal Nations or anyone else. Additionally, the Proposed Plan uses a systematic, interdisciplinary approach and integration of natural and social science, based on the best available science. This is demonstrated by the inclusion of scientific reports and data in the affected environment and environmental consequences, and list of references cited. In accordance with NEPA (40 CFR 1506.6) the agencies have used " high-quality information, including reliable data and resources, models, and Indigenous Knowledge" in preparing this analysis.
17807-10	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Communicate with indigenous communities on all actions take with the natural and built environment including protection.	PUBL02-Bears Ears Commission	The agencies have incorporated a co-stewardship section into the Resource Management Plan to outline the agencies commitment to continues work with Tribal Nations and indigenous communities.
17807-8	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	What specific process will Tribal Nations use to assure participation in BENM co-management decisions?	PUBL02-Bears Ears Commission	The agencies have incorporated a co-stewardship section into the Resource Management Plan to outline the agencies commitment to continues work with Tribal Nations and indigenous communities. Additionally, in recognition of the importance of Tribal knowledge about the lands and objects within the boundaries defined by Proclamation 10285, and to ensure that management decisions affecting the Monument reflect the expertise and traditional and historical knowledge of interested Tribal Nations and people, the BLM and USDA Forest Service will continue to meaningfully engage with the BEC regarding the development of the management plan and to inform management of BENM as required in Proclamations 9558 and 10285. However, the BLM and USFS will have final decision-making authority over management decisions.
18696-4	Julian Soncco		Give ACEC decision making authority to the Bears Ears Commission and Tribal Leaders alongside federal agencies as they must have an option to protect water as a sacred and cultural resource.	PUBL02-Bears Ears Commission, ACEC01-General	In recognition of the importance of Tribal knowledge about the lands and objects within the boundaries defined by Proclamation 10285, and to ensure that management decisions affecting the Monument reflect the expertise and traditional and historical knowledge of interested Tribal Nations and people, the BLM and USDA Forest Service will continue to meaningfully engage with the BEC regarding the development of the management plan and to inform management of BENM as required in Proclamations 9558 and 10285. However, the BLM and USFS will have final decision-making authority over management decisions.
18238-78	Chaitna Sinha		We propose: The final plan should include a process for stated deadlines to be reviewed and revised upon request of the BEC. We are concerned that the deadlines proposed will not facilitate meaningful Tribal engagement. We recognize the need for deadlines, but also think that this process should be subject to review to ensure that it facilitates meaningful input and is not just a check the box exercise. Additionally, there is a significant risk that meeting these deadlines could be hampered by a lack of sufficient human and financial resources. The BLM acknowledges that federal funding is potentially available to support continued Tribal engagement. At the discretion of Authorized Officer (BLM)/Responsible Official (USDA Forest Service), funding may be provided to Tribes to facilitate their participation in the NEPA and NHPA processes under several circumstances. DEIS, Appendix C, p. C-9. Not only should the Agencies use their discretion to authorize funding for continued Tribal engagement, but they should also use every other available resource and mechanism to support the tribes meaningful and ongoing involvement in the management of Bears Ears, including IPA agreements, reverse IPA agreements, cross-deputization agreements, and 638 contracting. The Agencies should clearly make this commitment as part of the land management plan.	PUBL02-Bears Ears Commission, ALT05-Alternative E	The Tribal Co-Stewardship section in Chapter 2 describes the Tribal co-stewardship process for the preparation of the RMP and for continuing collaboration for management of BENM. The cooperative agreement has been incorporated into the Proposed Plan. The co-stewardship section of the Proposed Plan does include guidance about budget planning.
18238-88	Chaitna Sinha		We propose: The final plan must include a process for continued BEC collaboration, including communication and review of implementation-level plans and projects. This is essential for facilitating meaningful Tribal input. For all alternatives, at least 15 days prior to initiating an	PUBL02-Bears Ears Commission, ALT05-Alternative E	The Tribal Co-Stewardship section in Chapter 2 outlines how all alternatives will require at least 15 days prior notification for all implementation level projects, including all implementation level plans. BEC input and engagement will be part of agency decision-making by adhering to the communication and review

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			implementation-level project in BENM, the agencies would provide initial notification to the BEC and provide an opportunity to collaborate via email. DEIS, Vol. 1, p. 2-11. However, this raises two significant issues. First, it is important to have clarity about what this provision covers. Would this cover all projects or just implementation-level plans? If it does not cover all projects, then the BLM should clarify when it would be applicable and what types of projects could commence without BEC input.		processes. Also refer to Appendix C: Tribal Nations Collaborative Framework which summarizes the level of Tribal collaboration during implementation planning.
5740-1	Roger Jenkins 588 Evening Star Ln, Bozeman, MT 59715 BOZEMAN, 59715		A few points for improvements of the two Alternatives, D and E, that I would like to make. I know this is not a popularity contest, but I would likely support either Alternative. How, since Alternative E does not use the BLM Planning framework, but basically leaves it up to the tribes (or the Bears Ears Commission), Alt-E feels a bit loose in its framework. The needs to be clarity, and something spelled out carefully, how this Co-Management between the BEC and the BLM will work. Who pays and who gets to have a say if there is conflict between the two organizations. Such may have been spelled out in the 1200+ pages of the RMP, and maybe I missed it, but my sense is that it was not featured.	PUBL02-Bears Ears Commission, ALT07-Modification of Existing Alternatives	The agencies have incorporated a co-stewardship section into the Resource Management Plan in Chapter 2 to outline the agencies commitment to continues work with Tribal Nations and indigenous communities. Additionally, In recognition of the importance of Tribal knowledge about the lands and objects within the boundaries defined by Proclamation 10285, and to ensure that management decisions affecting the Monument reflect the expertise and traditional and historical knowledge of interested Tribal Nations and people, the BLM and USDA Forest Service will continue to meaningfully engage with the BEC regarding the development of the management plan and to inform management of BENM as required in Proclamations 9558 and 10285. However, the BLM and USFS will have final decision-making authority over management decisions.
9524-6	379 Ridge View Drive Grand Junction, CO 81507Sherry Schenk		Future Management priorities in the preferred alternative must include designation of land protection through such designation categories as WSAs, LWCs, ACECs and other similar protection categories for land areas that meet the required criteria . Also the BEC must have a role in the identification and designation of these land protection categories.	PUBL02-Bears Ears Commission, ALT07-Modification of Existing Alternatives	The Lands with Wilderness Characteristics and Special Designation sections in Chapter 2include management direction for WSAs, LWCs, and ACECs for the Proposed Plan. The BEC has participated alongside the BLM and USDA Forest Service in development of the range of alternatives, including special designations like these in the Proposed Plan.
17573-20	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State is concerned about who is behind the BEC operations and decision-making. The BEC is a Presidentially created entity that appears to function as a Non-Governmental Organization (NGO). BECs Charitable Solicitation Disclosures connect directly to the Audited Financial Statements and IRS Form 990s for Legacy Resource Fund, an NGO conglomerate and pass-through organization. The State has significant concerns that the Agencies have handed over management and planning of public lands to a large NGO conglomerate, to the eventual detriment of the State, Tribal Nations, and Tribal members. To the extent the BEC is effectively making decisions for the federal government, this represents an unlawful delegation of authority not authorized by statute.	PUBL02-Bears Ears Commission, DECI07-Compliance with other laws and policies	The Proposed Plan and the BLM's interactions with the BEC comply with all applicable laws and regulations. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. The agencies have not handed over management and planning authority to the BEC or any other entity.
9372-3	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	On page 29, where the executive summary gives a brief overview of alternative E, it concludes the paragraph with "collaboration with Tribal Nations to incorporate those considerations into BENM day-to-day management" Of the five tribal nations that compose the BEC, none of their headquartered offices are in San Juan County, Utah. The Navajo nation reaches into the county and the decisions made directly affect their lives. The Ute Mountain tribe has a branch in San Juan and the decisions made directly affect their lives. However, it is not the voice of those people who live here who are being considered, but the voice of those in headquarters hundreds of miles away. Furthermore, these are individuals who have not been elected by the public but have been specifically chosen to advance the objectives of separate sovereign nations and not the will of the people. This, alone, is concerning, but furthermore, it is U.S. tax dollars that pay for everything done regarding the administration and application of this management plan. Therefore, this is also a prime example of the term taxation without representation. While not prohibited by law, many historical examples have proven that this practice results in unrest and problems. While the proclamation looks to incorporate tribal expertise and provide insight, let us have the local tribal chapters cast their votes on concerns that present direct conflict with existing management guided by the DOI approved management decisions in the 2020 ROD/MMPs, 2008 Monticello RMP, 2008 Moab RMP, and 1986 Manti-La Sal LRMP(Page 25) rather than a selective, disconnected few determining the day-to-day management of U.S. public lands.	PUBL02-Bears Ears Commission, DECI07-Compliance with other laws and policies	Determining membership of the Bears Ears Commission is out of scope for this RMP/EIS. The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands. Additionally, Appendix O provides details on public involvement, government-to-government consultation, and cooperating agency engagement during the planning process.
19002-1	Maury Bergman bergmanmaury@gmail.com		The Management Commission is comprised of only one representative from five Native American tribes. There is no representation from State, County, or local governments on the Commission. Even though these entities are listed as "Cooperating Agencies", their involvement has primarily been an invitation to attend meetings, with little to no input. On the other hand, the Commission has met weekly, if not more, to comprise the draft document. Additionally, there are no representatives from grazing, natural resources, recreational enthusiast or other users. This poses an extreme bias. According to the proclamation, the Secretary of the Interior shall provide maximum public involvement to the development and implementation of the management plan, including federally recognized Tribes and State and local governments. This has not happened and violates the designation of the Proclamation. I also find it alarming that more non-cooperating tribes helped compile the Management Plan than cooperating agencies.	PUBL03	The agencies held multiple meetings with cooperating agencies throughout the planning process, attended by local and state governments and other federal agencies. In addition the agencies held multiple public meeting and met with stakeholders as a part of the Section 106 process. See the Consultation and Coordination appendix for further details and updates in the Proposed Plan.
18677-3	Benjamin Bellorado Tucson, AZ		The statements outlined in section 2.4.14.2. superficially equates efforts of Federal Land Managers directly with the generation of scientific knowledge. I argue that resource management, while particularly important, is not completely the same as the generation of scientific knowledge about the cultural resources in the BENM. There needs to be an advisory board, or similar body, which can add suggestions and comments on the management of cultural resources and generation of interpretation to the Bears Ears Commission (BEC). For decades, archaeologists have worked with land managers to document, preserve, and protect the cultural resources (and other resources) in the	PUBL03-Monument Advisory Committee, ARC01-General	The BLM and USDA Forest Service have solicited input from professional archaeologists and cultural resources specialists associated with the Department of the Interior, the Department of Agriculture, Tribal Nations, and members of the public during the BENM planning process. Moreover, as noted in the comment, the MAC does include professional archaeological representation. Committees composed of various members of the public representing certain constituencies are governed by the Federal Advisory

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			BENM area. At present, as far as I am aware, only one archaeologist currently sits on the Monument Advisory Commission (MOC). This situation is unacceptable as such a large component of the monuments visitation centers on its cultural resources.		Committee Act (FACA). The agencies cannot engage with committees outside this law. Currently the MAC is the only committee authorized under FACA for BENM.
17573-1	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, the State is concerned that this plan has been developed without proper coordination with CAs as set forth in the National Environmental Policy Act (NEPA), the Federal Land Policy and Management Act (FLPMA), CEQ regulations, and both Bureau of Land Management (BLM) and United States Forest Service (USFS) (Collectively BLM and USFS will be referred to as Agencies) policies. As a CA, the State has attempted to be an active participant throughout the RMP/EIS process. However, at every turn, the BLM and USFS have ensured that the States participation is extremely limited (if allowed at all). Despite CA status, the State has been relegated to a spectator on the sidelines. Unfortunately, as will be set forth in this comment letter, rather than following federal law and their own policies, the Agencies have willfully limited the States opportunities to participate in this planning process while elevating the participation of the Bears Ears Commission (BEC). The States substantive concerns and recommendations have also been disregarded while the BEC and the Agencies created an entire alternative to represent BEC requests.	PUBL04-Cooperating Agencies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a detailed list of the various instances of engagement between the agencies and the cooperating agencies. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the State as a cooperating agency resulted in several changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with the State of Utah, where appropriate to ensure coordination on management of the Monument and implementation of the RMP, and added ROW open areas along paved highways.
17573-16	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The Proclamation gave directives to the BEC. However, the Agencies went beyond the scope of the Proclamation by seeking CA-level input from non-CA entities such as the Pueblo of Zuni, the Ute Indian Tribe, the Ute Mountain Tribe, and the Navajo Nation, in addition to the BEC. Noticeably absent from the List of Preparers are the State of Utah, SITLA, and San Juan County.	PUBL04-Cooperating Agencies	Please see changes to the list of preparers in Appendix O. The list of preparers was updated consistent with 40 CFR 1502.18 to no longer include the BEC or individuals who provided expertise and traditional and historical knowledge. While the BEC was provided opportunities for input on the document similar to those provided for the cooperating agencies, the document was prepared by the agencies.
17573-14	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The Agencies boast of holding six meetings with CAs over the course of the planning process. What they fail to acknowledge is that after the agencies rescheduled two separate times, one of those six meetings was after this RMP/EIS was released to the public. Additionally, two of those six meetings were clearly stated as informational sessions with no additional opportunity or time for the CAs to comment or suggest changes. Finally, one of those meetings was held with CAs only having four calendar days, including a weekend, to review hundreds of pages of documents and prepare for the CA meeting. CEQ regulations call for early and significant involvement by CAs in the preparation of an EIS.10 The Agencies have failed to significantly involve the CAs in this planning process by limiting the CA meetings, limiting the availability of local agency staff at those meetings, limiting the CAs ability to prepare for the CA meetings adequately, and expressly limiting one-third of the CA meetings to informational only.	PUBL04-Cooperating Agencies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the State as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with the State of Utah, where appropriate to ensure coordination on management of the Monument and implementation of the RMP and added ROW open areas along paved highways.
17573-15	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State objects to the notion that any substantive changes were made in response to the comments received by the cooperating agencies. It is evident that language was moved around and dispersed, but there is no indication that any meaningful changes were made in response to the cooperating agencies input. The Agencies unsupported claims of substantive changes based on CA input should be struck from the RMP/EIS, or the Agencies should remedy this lack of cooperation immediately.	PUBL04-Cooperating Agencies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the State as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with the State of Utah, where appropriate to ensure coordination on management of the Monument and implementation of the RMP and added ROW open areas along paved highways.
17573-17	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The Agencies focus on eliminating the States rights from this land and plan is no more apparent than in Table 2-13 of the RMP/EIS, where it states that the Agencies will coordinate law enforcement efforts with the BEC and Tribal Nations to protect cultural sites and historic properties. This coordination on law enforcement will not include any coordination or cooperation with the State or County in which this land is located. The same State and County do the lions share of enforcement within BENM due to continued staffing shortages with the Agencies. The same State and County have clear (statutory as well as constitutional) police powers over all but a small number of criminal offenses within the monument. Even with all of that, the Agencies will be coordinating and involving NGOs and tribal nations in the policing of federal lands within the State of Utah. Blatant constitutional and legal transgressions aside, this action clearly illustrates the extent to which the Agencies are seeking to ignore the legal authorities of the State and County and create a new Indian Country11 jurisdiction without going through the required processes.	PUBL04-Cooperating Agencies	The Proposed Plan was updated in the Cultural Resources section in Chapter 2 to clarify that agencies would coordinate with the BEC and Tribal nations to identify areas that would benefit from increased law enforcement efforts to protect cultural resources. The Management Common to All Alternatives in the Recreation and Visitor Services section of Chapter 2 includes management regarding collaboration with BEC, county, state, and Tribal law enforcement.
17573-18	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Further examples of the Agencies refusal to acknowledge the Congressionally delegated authorities of the State are prevalent throughout the plan. These include usurping the congressionally and court-delegated authority of the State in areas like the Clean Air Act, Clean Water Act, National Historic Preservation Act, and various wildlife management laws and cases. The State recognizes that the decision-making authority is solely that of the Agencies and only seeks its rightful place in the planning process as required in federal law. The State truly hopes that efforts will be made to correct the gross inadequacy of the planning process up to this point to create a legally defensible management plan for BENM.	PUBL04-Cooperating Agencies	The Proposed Plan complies with all applicable laws and regulations.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17573-5	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	But perhaps the State and County are the only necessary parties that have been eliminated from the planning process. Based on information obtained by the State, local BLM and Forest Service offices have also been significantly bypassed in the push of a third-party agenda. For example, before one CA meeting where the CAs only received four days to review significant and lengthy technical documents before the meeting, the BLM Field Office Manager stated that the Agency was also at a disadvantage because We [local Agency officials] got this draft the same time you [the State] did. Later, it was learned by the CAs that a new alternative had been developed and that it was to be the preferred alternative. When the local agencies were confronted, they admitted that there was a newly developed alternative (Alternative E), but denied that a preferred alternative had been selected. Alternative E was then promptly installed as the preferred alternative. In hindsight, the CAs were either lied to by the local Agency officials, or the local staff and leadership (including the important interdisciplinary team) were also being left out of the process while some other agenda was being pursued. It is likely the latter, especially considering that Department of Interior and Department of Agriculture officials are on record discussing the agencies competition to see who can create the most tribal co-stewardship agreements. ¹ Based on those comments by Washington D.C. Agency officials and their one-way actions towards the RMP/EIS, it would appear they view the CAs and local Agency officials input as unimportant compared to other groups input.	PUBL04-Cooperating Agencies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The agencies understand the challenges that cooperating agencies face to provide substantive engagement in the RMP/EIS process, including during document review periods, and appreciate their input. The agencies' timeline and milestone schedule for the BENM RMP/EIS was developed to facilitate efficient review pursuant to NEPA.
	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	LACK OF COORDINATION WITH COOPERATING AGENCIES TLA shares the concerns expressed by the State of Utah and San Juan County regarding the lack of meaningful coordination with Cooperating Agencies in the development of the RMP/EIS. We disagree with the statement made in Section 4.3 of the RMP/EIS that the BLM and USDA Forest Service worked closely with cooperating agencies to develop alternatives and guide the analysis contained in the draft RMP/EIS. A prime example to the contrary is the development of Alternative E, the federal agencies' preferred alternative, which was developed with no input or comment from the Cooperating Agencies prior to its release to the public as part of this draft RMP/EIS. We urge the federal agencies to reconsider this approach in favor of a truly collaborative effort that is in harmony with FLPMA.	PUBL04-Cooperating Agencies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the Trust Lands Administration, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process.
17573-7	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Section 1.6.3 of the RMP/EIS states that, other than the mineral section, the draft plan is generally consistent with the State and County Plans. The RMP/EIS contains strong statements suggesting that the Agencies have been as consistent as possible with the States plans. The RMP/EIS also alleges that the State has not notified the agencies of inconsistencies with their plans throughout the planning process. ² This is a gross misrepresentation of reality. Since the outset of the planning process, the State has provided extensive scoping comments, draft alternatives comments, and a variety of verbal comments in CA meetings. All such comments include references to, or reflection on, the SRMP. The Agencies have not addressed these comments. This generally consistent language alleges that the Agencies have incorporated State policies without providing any actual explanation demonstrating how that was done. The State renews its objection that the draft plan is not consistent with State policies and plans. The State is willing and ready to coordinate specific provisions of the SRMP that remain unaddressed in the RMP/EIS at the Agencies' earliest convenience. It is not too late for the Agencies to restart this process from the beginning so that it can comply with federal law.	PUBL04-Cooperating Agencies, DATA01-Analysis Methods and Data	Land use plans must be consistent with adopted State and local plans to the maximum extent the BLM finds consistent with Federal law and the purposes of FLPMA. The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. Appendix B of the RMP/EIS states the plans that were considered for consistency during development of the RMP/EIS. The agencies strived to make the Proposed Plan as consistent as possible with these state and local plans. See the Disagreement and Inconsistency, Appendix S for a summary of where the BLM/USDA Forest Service and Cooperator disagree on substantive elements of the RMP/EIS.
17573-10	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, FLPMA states that in the development and revision of land use plans, the BLM has an independent responsibility to coordinate with other units of government (43 U.S.C. 1712(c)(9)). ⁴ As stated, the BLM must, to the extent practicable, also seek to maximize consistency with the plans and policies of other government entities, whether or not a CA relationship has been established. ⁵ The Agencies have completely failed to coordinate with the State or maximize consistency with the SRMP or the SJCRMP. Additionally, NFMA imposes similar coordination and consistency obligations, ⁶ and the Agencies have failed to fulfill those, including by performing the necessary analysis of how federal and State plans can be harmonized.	PUBL04-Cooperating Agencies, DECIO1-Decision Process	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. Appendix B of the RMP/EIS states the plans that were considered for consistency during development of the RMP/EIS. The agencies strived to make the Proposed Plan as consistent as possible with these plans and outlines in Appendix S where the Proposed Plan is not consistent with state and local plans.
18990-3	Clif Koontz		The foregoing FLPMA 202 obligations are reflected in the Council on Environmental Quality (CEQ regulations) to which the Lead Agencies are subject. 40 CFR 1507.1 The Lead Agencies have failed to [engage] in interagency cooperation before or as the environmental impact statement [DRMP/EIS] is prepared, instead arbitrarily opting to await submission of comments State and County Cooperators on a completed document, in violation of 40 CFR 1500.5(d). The Lead Agencies from the very beginning in this EIS process, have merely submitted completed documents and sections thereof and waited for the cooperating agencies to comment. Getting together with the State and County Cooperators from the beginning and together write and construct the DRMP/EIS, have not been features of this process. This failure to engage State and County Cooperators in preparation of the DRMP/EIS from the start, also seriously violates the Lead Agencies duty and obligation under 40 CFR 1500.5(j) to [eliminate] duplication with State, Tribal, and local procedures by providing for joint preparation of environmental documents where practicable. It was certainly practicable here; the Lead Agencies just chose to ignore their regulatory obligation.	PUBL04-Cooperating Agencies, DECIO7-Compliance with other laws and policies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah and local counties, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies coordinated with cooperating agencies, including the State of Utah, in regard to recreational shooting and adjusted the range of alternatives based on input received. In response to comments during the public comment process and cooperating agencies, the agencies added in the State of Utah in appropriate places in the Proposed Plan for further coordination on implementation of the RMP.
18990-4	Clif Koontz		The Lead Agencies have ignored and violated their 40 CFR 1506.2(b) obligations, namely: To the fullest extent practicable unless specifically prohibited by law, agencies shall cooperate with State, Tribal, and local agencies to reduce duplication between NEPA and State, Tribal, and local	PUBL04-Cooperating Agencies, DECIO7-	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			requirements, including through use of studies, analysis, and decisions developed by State, Tribal, or local agencies. Except for cases covered by paragraph (a) of this section, such cooperation shall include, to the fullest extent practicable: (1) Joint planning processes. (2) Joint environmental research and studies. (3) Joint public hearings (except where otherwise provided by statute). (4) Joint environmental assessments. Contrary to the above-quoted regulation, the Lead Agencies failed to have joint planning processes with the State and County Cooperators. The Lead Agencies failed to do joint environmental research and studies with the cooperators.	Compliance with other laws and policies	agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the State as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with the State of Utah, where appropriate to ensure coordination on management of the Monument and implementation of the RMP and added ROW open areas along paved highways. The agencies have complied with NEPA, FLPMA and other Federal law in the planning processes in addition to following the direction in the relevant Proclamations and the Intergovernmental Agreement between the Bears Ears Commission and the federal agencies. Where possible, the Federal agencies have worked with cooperating agencies on the development of the plan and environmental analysis.
18990-5	Clif Koontz		The Lead Agencies failed with respect to [the State and County] cooperating agencies, to use the environmental analysis and proposals of cooperating agencies with jurisdiction by law or special expertise, to the maximum extent practicable, in violation of 40 CFR 1501.7(h)(2). Virtually every proposal and analysis of the County have been ignored, almost maximally.	PUBL04-Cooperating Agencies, DECI07-Compliance with other laws and policies	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies coordinated with cooperating agencies, including the State of Utah, in regard to recreational shooting and adjusted the range of alternatives based on input received. In response to comments during the public comment process and cooperating agencies, the agencies added in the State of Utah throughout the plan for further coordination on implementation of the RMP.
17573-78	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The DWR utilizes hunting harvest to manage population size and distribution across the landscape. Access to hunting and fishing must remain available to manage wildlife populations. Administrative access for the use of helicopters, OHVs, and other tools for wildlife and habitat monitoring, collaring, and surveys is essential for the DWR to manage wildlife and should be identified in the plan. The DWR regulates shed antler gathering balancing the impacts on wildlife and the interest in the publics enjoyment of a public resource. Vegetation and habitat management to support fish and wildlife habitats and healthy watersheds are extremely important to the DWR. Utah's Watershed Restoration Initiative (WRI) is a partnership-based program in Utah to collaboratively develop and improve watersheds through habitat restoration projects. ⁷³ All alternatives where wildlife habitat is referenced, including vegetation, forestry, or fuels management, should include coordination with the DWR and using the WRI partnership alongside BLM, US Forest Service (USFS), and Bears Ears Commission (BEC) where applicable. As written, it does not.	PUBL04-Cooperating Agencies, WILDFISH02-Wildlife Habitat	Language has been added to Chapter 2 Management Actions Common to All Alternatives referencing coordination with state agencies, including the DWR. Additionally, administrative access will continue to be allowed under any of the proposed alternatives. The Proposed Plan does not include WRI as it is a financial mechanism, not an agency, available for use by the listed agencies. .
18657-73	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Many of our members and supporters have expressed considerable frustration and difficulties being forced to use the EPlanning website to submit comments. Both BLM and UPLA have been emphasizing the importance of more substantive comments, but the Participate Now link makes it much more difficult. The Participate Now link often takes 10-15 seconds to appear when accessing the page, many people abandon the site before it appears, and occasionally the link does not work There is no Help option on the Participate Now page for people having difficulty. Deep linking to the Participate Now Comment page is not supported The 5000 character limit for comments is inadequate to support substantive comments, my comments nearly 8000 words without any attachments. The file types do not support adding gpx or kmz files which are the most commonly used There is no ability to simultaneously copy other organizations or elected officials in comments so that they are aware. Mailing comments is impractical, especially when photos are included. We urge that BLM offer the option of submitting comments by a dedicated email address as they have in the past.	PUBL05-Public Comment Period/Public Meetings	Multiple opportunities to comment were provided throughout the planning process, each with public open houses where comments could be made in addition to mailing letters or using the ePlanning site. Approximately 18,700 comment letters were received on the draft environmental impact statement and seven public open houses were held for the comment period. Given the extensive public participation in public open houses, as well as via the submissions in ePlanning, and mail, there is sufficient public participation to meet requirements for public participation.
17573-12	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	One such example is that only two open houses were scheduled within San Juan County during the draft alternatives comment period. Of those, the meeting held in Blanding was scheduled directly in conflict with a popular community event. This resulted in a very low public turnout. Had there been appropriate CA involvement, more public would have likely attended that meeting and provided public comment and input. Furthermore, at the April 23, 2024, public open house in Blanding, CAs requested that the format be modified to allow for a Q&A period before continuing with the open house format planned by the agencies. That request was immediately rejected and not allowed ⁹ . The agencies have had no intention of allowing meaningful participation by the CAs, not even on something as mundane as the format, time, or location of the open houses within the local community.	PUBL05-Public Comment Period/Public Meetings	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies' coordination with the State as a cooperating agency resulted in a number of changes to the Draft RMP/EIS, including with regard to recreational shooting, the agencies adjusted the range of alternatives based on input received. Based on feedback from the State, the agencies made changes to the Proposed Plan including coordination with the State of Utah, where appropriate to ensure coordination on management of the Monument and implementation of the RMP, and added ROW open areas along paved highways.
603-1	Retired BLM P&EC		I attended the first BENM planning meeting that was virtual on Zoom. I appreciated the helpful information. However, I asked seven questions during the meeting and none of them were answered.	PUBL05-Public Comment Period/Public Meetings	Thank you for your participation. The questions received during the virtual meetings are posted with the answers on the BENM planning website.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17573-28	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, 40 CFR 1502.8 states that [a]gencies shall write environmental impact statements in plain language and may use appropriate graphics so that decision-makers and the public can readily understand such statements. Agencies should employ writers of clear prose or editors to write, review, or edit statements However, the RMP/EIS lacks critical clarity in the definition of recreational shooting ¹⁵ and utilizes detail-deficient maps (specifically the locations or depiction of existing routes within proposed OHV area closures and allotment and pasture boundaries on the grazing maps), amongst other glaring issues. These deficiencies have been raised by CAs and the public, and the Agencies response has been, This is only a draft, include that concern in your comment or, That sounds like a great topic for a comment letter, or We havent even looked at that data. These responses are not in compliance with 40 CFR 1502.21 (stating that if the incomplete but available information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives, and the overall costs of obtaining it are not unreasonable, the agency shall include the information in the [EIS]) or 40 CFR 1502.9 (stating that to the fullest extent practicable, the draft statement must meet the requirements established for final statements.). Such action is inconsistent with the purposes of an EIS, 40 CFR 1502.1, and is arbitrary and capricious as it thwarts the purpose of the comment process. The remedy for deficiencies is not to direct the public to put it in a comment letter, but rather for the agency to publish a supplemental draft of the appropriate portion. 40 CFR 1502.9. The Agencies have failed to do so. The State respectfully requests that the Agencies provide a supplemental draft of the appropriate portion and a renewed comment period to allow the public to adequately comment on these important aspects of the RMP/EIS.	PUBL06-Public Outreach/Availability of Info	The agencies have revised the Final EIS in response to comments to provide additional clarity. A definition of recreational shooting that the agencies developed in coordination with the State was added to the Proposed Plan. The agencies also added maps with allotment boundaries to Appendix A and made some changes to various maps based on public comment. The Draft EIS presented detailed analysis of the potential impacts of the range of alternatives and considered all comments received in developing the Final EIS and Proposed Plan, in compliance with NEPA.
17573-3	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Second, the Agencies have failed to provide sufficient material for the public to adequately comment on this RMP/EIS. They have failed to provide adequately detailed maps specifically showing existing routes or trails within proposed OHV closed areas; or allotment boundaries on the grazing maps. They have failed to provide the necessary definitions. They have failed to respond to public questions posed during the public commenting period. When questioned regarding missing definitions and inadequate maps, Agency personnel simply and dismissively say, This is just a draft, so include those concerns in your comment letter.	PUBL06-Public Outreach/Availability of Info	The Draft EIS presented detailed analysis of the potential impacts of the range of alternatives and considered all comments received in developing the Final EIS and Proposed Plan, in compliance with NEPA. With the Draft EIS the agencies provided both a static map showing each currently designated route and status within an OHV Limited or OHV Closed area (Appendix A) and an interactive map allowing the public to view the same information in detail.
18315-1	LISA RARICK		The information being provided is extremely overwhelming for the general public. I would like to see a condensed version that is easier to understand.	PUBL06-Public Outreach/Availability of Info	The Executive Summary at the beginning of the RMP/EIS provides a condensed summary of the EIS.
18315-2	LISA RARICK		In addition, it is very difficult to identify some of the dirt roads that my family has used for years when they are not being identified on the maps for me to comment on how these plans would impact access.	PUBL06-Public Outreach/Availability of Info	The public was provided with both a static map showing each currently designated route and it's status within an OHV Limited or OHV Closed area (Appendix A) and an interactive map allowing for the same information to be viewed in detail. There will also be implementation-level planning for travel management which will include public participation.
18657-41	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Within the dynamic maps, the layers on the maps contain inaccurate and misleading data. Existing recreation routes, areas, and high-value recreation sites are omitted from the maps. This makes it impossible for members of the public to accurately evaluate and speak to the range of impacts they will experience through implementation of the alternatives presented in the RMP.	PUBL06-Public Outreach/Availability of Info	The public was provided with both a static map showing each currently designated route and it's status within an OHV Limited or OHV Closed area (Appendix A) and an interactive map allowing for the same information to be viewed in detail. The BLM used the best available information, including current route data and management areas from the 2008 RMP. to compile the maps.
18657-50	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	In order to provide substantive comments on routes that may be affected by R.S. 2477 claims after the adjudication is determined, Routes with R.S. 2477 claims must be included as a layer in the dynamic Interactive Map.	PUBL06-Public Outreach/Availability of Info	The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
18668-9	Vanessa Soncco		Provide funding commitments to provide educational programming, training and education materials for Agencies and Bears Ears Commission and the public regarding the Missing and Murdered Relatives initiatives to strengthen and support Tribal members who go missing near or on the monument.	PUBL06-Public Outreach/Availability of Info, ALT05-Alternative E	Education opportunities are described in the Cross-Cultural Education and Outreach section of Chapter 2. Specific funding and educational programs will be determined at the implementation level.
16988-8	Andy Blair 1690 East 2000 South Driggs, 83422	The National Outdoor Leadership School (NOLS)	Transparency: Continue to maintain transparency in the decision-making process by regularly updating the public on management actions, findings from monitoring programs, and opportunities for involvement	PUBL06-Public Outreach/Availability of Info, ALT07-Modification of Existing Alternatives	Information about public involvement is described in Chapter 4, Consultation and Coordination and in Appendix O. Findings from monitoring programs and opportunities for public involvement will be determined at the implementation stage for each resource.
18990-2	Clif Koontz		In violation of FLPMA Section 202(c) obligations, see 43 U.S.C. 1712(c), the Lead Agencies have made impossible the mandated coordination work among the Lead Agencies and the State and	PUBL06-Public Outreach/Availability of	The agencies collaborated with state and local agencies throughout the planning process, including through public and cooperating agency engagement opportunities. See Appendix O for a list of

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			County cooperators to achieve maximum consistency with state and local plans and policies, to the maximum extent possible, while achieving the objective of protecting the relevant inventoried BENM objects. Why has this become impossible? Because the Lead Agencies have failed to properly inventory and reveal to the State and County Cooperators, what those Proclamation mandated objects for protection even are. There is nothing in the hundreds of pages of the DRMP/EIS that indicates otherwise. Thus the coordination work among the Lead Agencies and State and County Cooperators, necessary to uphold state and local resource management plans to the maximum extent possible while still protecting identified monument objects, is an impossible non-starter in this case. The BENM DRMP/EIS process has utterly failed in this regard. One can hardly make this stuff up, to think that the State, County, the Organizations and other members of the public, now have a DRMP/EIS they must comment upon, when none of the needed coordination and consistency work has even been started in order to justify the DRMP/EIS and its restrictions on travel in the Monument, as well as restrictions on other established resource uses. Again, this is all due to the Lead Agencies refusal to first determine, and then share, information on the objects to be protected. One may reasonably wonder whether the Lead Agencies themselves even have in their possession a comprehensive inventory of such objects, much less have shared them. Consider how dysfunctional the above-described situation is while contemplating the following mandate under FLPMA 202(c)(9): (9) to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located, including, but not limited to, the statewide outdoor recreation plans developed under chapter 2003 of title 54, and of or for Indian tribes by, among other things, considering the policies of approved State and tribal land resource management programs. In implementing this directive, the Secretary shall, to the extent he finds practical, keep apprised of State, local, and tribal land use plans; assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands; assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. Such officials in each State are authorized to furnish advice to the Secretary with respect to the development and revision of land use plans, land use guidelines, land use rules, and land use regulations for the public lands within such State and with respect to such other land use matters as may be referred to them by him. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act. (Emphasis added.)	Info, DECI05-Cooperating Agency Relationships, DECI07-Compliance with other laws and policies	cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, including the State of Utah and local counties, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies coordinated with cooperating agencies, including the State of Utah, in regard to recreational shooting and adjusted the range of alternatives based on input received. The agencies added in the State of Utah throughout the plan for further coordination on implementation of the RMP. See the Disagreement and Inconsistency, Appendix S for a summary of where the BLM/USDA Forest Service and Cooperators disagree on substantive elements of the RMP/EIS. Presidential Proclamation 10285 discusses resources located within BENM, with which many, but not all, constitute objects of historic and scientific interest. The agencies are preparing the RMP/EIS consistent with the protection of those resources, including the objects of historic and scientific interest.
18657-42	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Figure 2-28 Recreation Opportunity Spectrum This map (located in Volume 2 of the RMP, Figure 2-28, Recreation Opportunity Spectrum, page A-31) shows non-motorized ROS zones covering far more of the forest than what is currently in place from the 1986 LMP of the Manti-La Sal National Forest. By not specifying an alternative, the map inaccurately implies that it's portraying the current ROS. In fact, in the text of the draft RMP, specifically Table 2-1 on Page 2-4 of Volume 1, it inaccurately reports these inflated non-motorized zones to be the current ROS in Alternative A. Further, our fellow advocates for protection of public access to public lands, Ride with Respect, clearly alerted monument planners to this inaccuracy in Part 8 on Page 4 of their 2022 Analysis of the Management Situation15 (AMS) comments. Yet the 2024 draft RMP continues to propagate the inaccuracy. Note that this same inaccuracy is found in Figure 3-39 (Volume 2, page A-88) and in the "FS BENM ROS Draft" layer of the BLM's interactive map. It gives the public a false impression that the ROS zoning would be unchanged, which undermines the public's ability to meaningfully participate in this planning process.	PUBL06-Public Outreach/Availability of Info, EDIT01-tech edits needed in the EIS	The final environmental impact statement includes updated maps to reflect all alternatives.
18657-45	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Figures 2-38 through 2-42: Routes within OHV Area Designation This set of maps (located in Volume 2 of the RMP, Figures 2-38 to 2-42, Alternative A/B/C/D/E, routes within off-highway vehicle area designation, pages A-41 to A-45) all omit over 40 motorized routes. Figure 2-38 is shown below for illustration. The same map is then shown below that with the 40 routes highlighted in green. Note that this same inaccuracy is found in the corresponding layers of the BLM's interactive map ("BENM Routes in OHV Areas Alt A Draft," "...Alt B Draft," "...Alt C Draft," "...Alt D Draft," and "...Alt E Draft"). Per our understanding and inquiry of BENM planning managers, we are not aware of any of these routes being in areas that are proposed to be designated as OHV Closed, in which case they should be shown in blue rather than red. However, the omission of these 40 routes from the five figures again obfuscates the public's ability to meaningfully participate in this planning process. For example, in all of the action alternatives (B through E), the proposed OHV Closed boundaries are adjacent to many of these omitted routes. The presence of these routes would inform the public's comments on the proposed OHV Closed boundaries given potential future needs such as rerouting.	PUBL06-Public Outreach/Availability of Info, EDIT01-tech edits needed in the EIS	No motorized routes would be closed on NFS lands by this plan. The Shay Ridge OHV trail winds in and out of the BENM boundary, but it is not being closed in any alternative nor the Proposed Plan, nor is it within an OHV closed area. The scale of the maps do make it difficult to see the level of detail the commentor is discussing.
18657-46	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Neither the static nor dynamic maps provided for this RMP display backcountry airstrips or dispersed campsites. The impact of closures for both aircraft and camping is troubling because it is difficult to determine the impact of potential road closures on these uses. For camping specifically, the scope of	PUBL06-Public Outreach/Availability of	Fry Canyon and the Bluff Airport are the only designated backcountry airstrips in Bears Ears National Monument, other airstrips are not designated and not shown on the routes. Similarly inventoried dispersed campsites within Bears Ears National Monument are not currently designated and not shown in

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			negative impact on the American public from omission of display of dispersed campsites within RMP maps is vast. The prevalent majority of visitors to BENM utilize camping as a primary and preferred mode of overnight accommodation. Eradication of dispersed camping will subsequently eliminate affordable and practical means for the American public to spend extended time exploring and appreciating the unparalleled beauty, unique cultural and natural resources, and internationally renowned outdoor recreation opportunities that are held within BENM. Restriction or closure of dispersed camping creates economic harm for members of the American public who cannot afford to pay for accommodations outside of BENM. Omission of dispersed campsites within RMP maps demonstrates intentional misleading by planning managers to accurately disclose and inform the public of the full range of impacts within each of the five proposed alternatives for the draft RMP, and thereby obfuscates members of the public from conducting accurate evaluation of the RMP, and providing relevant comments throughout the planning process.	Info, EDIT01-tech edits needed in the EIS	this plan. Both airstrips and dispersed camping will be addressed in implementation level planning, at which point inventoried airstrips and campsites will be analyzed for suitability for designation.
19000-3	Doug Allen		Include local representatives who have been duly elected to the San Juan County Commission, Blanding City Mayor and Council and Monticello City Council and Mayor. They should have as much consideration as the Tribal Nations. San Juan County under the expert research of Nick Sandberg has spent many hours going over these proposed plans for BEM. It is a shame to not have been included originally and earlier in the process. It is my hope that the BEM Commission will listen and welcome others' viewpoints and concerns in the future.	PUBL07	The agencies collaborated with state and local governments throughout the planning process, including through public and cooperating agency engagement opportunities. See the consultation and coordination appendix for a list of cooperating agency engagement opportunities. The MOU between the agencies and cooperating agencies, San Juan County, outlines roles and responsibilities including, to the extent practicable, agency consideration of proposals, comments, recommendations provided by the cooperating agency during the planning process. The agencies coordinated with cooperating agencies, including San Juan County in regard to recreational shooting and adjusted the range of alternatives based on input received. The agencies added in the State of Utah throughout the plan for further coordination on implementation of the RMP.
19036-5	Gail Johnson		To elevate one group over other groups will not promote collaboration and respect among the various groups of people who use and love this land. We all have a deep love for this land. We all have historical roots here. We are all migrants to this area. The treatment of the American Indian since the first Europeans settled on this continent has long been debated. Regardless of this debate, the first permanent non-tribal settlers to this area (latter 1800's) migrated here legally** looking for refuge and a place to make a home. Just as all previous migrants throughout history and pre-history did. As with tribal nations, "our ancestral lands stretch far beyond the current boundaries of BENM ... " The whole of San Juan County, its history and geography, is linked to the land within the monument boundaries. As a non-tribal person, as a life-long resident of the area, and as a descendant of hard-working early settlers here, I want to see my heritage protected, too. I want to see my heritage protected for the generations who come after me. There is much in common between the tribal groups and non-tribal groups. All must be included and treated with fairness and respect.	PUBL07	Non-Indigenous historical connections to the BENM area are presented in detail in the Historic Communities, Historic Resources section. See Management Actions Common To All Action Alternatives in the Cultural Resources section) that notes the importance of non-Indigenous cultural resources within BENM. The proclamation states that grazing is a historical use by indigenous families as well as Anglo settlers and Hispanic sheep herders. The impacts on grazing by the management actions are disclosed in the EIS. See Chapter 3 Affected Environment of the Livestock Grazing section for more details.
10626-32	Debra Van Putten		It should be noted that in the preparation for this EIS, BLM omitted the mandatory fair and balanced advisory committee required in the Proclamations and federal law. There appears to have been exactly one non-Native American member of the public whose pre-EIS input was solicited and heard. The BLM did not merely fail to adhere to the directions of the Biden and Obama Proclamations and statute to have a neutral and inclusive advisory board. It worked hard to exclude anything but Native American voices from the process. In addition, to then have the Native Tribes (one of only many stakeholders) have co-control over the EIS/NEPA process, up to and including authority over final edits) is pretty much the definition of an arbitrary and capricious process and one that intentionally subverts the NEPA public participation process. The one-sided process employed by BLM has resulted in a great deal of bitterness locally, with locals constantly complaining that they feel their input doesnt matter and they have no voice. The EIS/RMP is fatally flawed and the process must be restarted at the beginning, with inclusion of all members of the public and a correct understanding of the legal basis for federal land management and the NEPA process. The EIS and the process by which it was produced is simply not legal.	PUBL07-Importance of Local Input	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Both the Proposed Plan and Intergovernmental Cooperative Agreement make clear that the BLM and USDA Forest Service maintain decision making authority for federal lands.
15116-1	Michele Ivins Halls 479 E Eagleridge Dr North Salt Lake, UT 84054		I feel strongly that a commission of local, multi-generational ranchers and farmers should also be consulted and used in the very same fashion and way as the BEC, not only to develop the original BENM management plan, but to sustain and alter the plan as needed going forward.	PUBL07-Importance of Local Input	There are opportunities for input as consistent with the National Environmental Policy Act. The planning effort included multiple opportunities to provide input and attend public meetings during scoping and when the draft was open for public input. Citizens can also engage with local government officials who represent them and attend the Monument Advisory Committee Meetings and provide public comments there.
15546-2	Michele Ivins Halls 479 E Eagleridge Dr North Salt Lake, UT 84054		I just read a statement in an appendix in Volume 2 submitted by the Hopi tribe in which they state that their tribe is 200 miles away from the BENM. Their claimed commitment and connection to the BENM land doesnt make complete sense to me. Their inclusion in the BEC also doesnt make sense to me. My ancestors didnt pass through the land, but they stayed and settled and are still there. My family are now the stewards of the land and the protectors of all the resources included in the BENM. My familys input about the BENM land use and management is as valuable, or is even the most valuable input, as any other. Almost any group of people can claim that their ancestors passed through a certain land, but if they didnt stay, they now arent the stewards of that land. Those who live, work, play, and die on the land are the best and most logical stewards, users, and managers of the land.	PUBL07-Importance of Local Input	The Bears Ears Commission is established in Presidential Proclamation 9558, which is incorporated in Presidential Proclamation 10285 designating BENM. As stated in the Presidential Proclamation the BEC membership is composed of elected officials of the five Tribal Nations of the BEC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15980-1	Payton Halls		I feel strongly that a commission of local, multi-generational ranchers and farmers should also be consulted and used in the very same fashion and way as the BEC, not only to develop the original BENM management plan, but to sustain and alter the plan as needed going forward.	PUBL07-Importance of Local Input	There are opportunities for input as consistent with the National Environmental Policy Act. The planning effort included multiple opportunities to provide input and attend public meetings during scoping and when the draft was open for public input. Citizens can also engage with local government officials who represent them and attend the Monument Advisory Committee Meetings and provide public comments there.
15980-5	Payton Halls		I just read a statement in an appendix in Volume 2 submitted by the Hopi tribe in which they state that their tribe is 200 miles away from the BENM. Their claimed commitment and connection to the BENM land doesnt make complete sense to me. Their inclusion in the BEC also doesnt make sense to me. My ancestors didnt pass through the land, but they stayed and settled and are still there. My family are now the stewards of the land and the protectors of all the resources included in the BENM. My familys input about the BENM land use and management is as valuable, or is even the most valuable input, as any other. Almost any group of people can claim that their ancestors passed through a certain land, but if they didnt stay, they now arent the stewards of that land. Those who live, work, play, and die on the land are the best and most logical stewards, users, and managers of the land.	PUBL07-Importance of Local Input	Determining membership of the Bears Ears Commission is out of scope for this RMP/EIS.
17630-3	Brent Tanner		The livestock grazers in the area have a long history of working with local agency land managers to care for the land. This proposal overlooked the input of local agency managers closest to the land who are most familiar with the needs of the area and the landscape. This proposal is a political maneuver not a responsible land management decision in the best interests of the land, people and local economy.	PUBL07-Importance of Local Input	There are opportunities for input as consistent with the National Environmental Policy Act. The planning effort included multiple opportunities to provide input and attend public meetings during scoping and when the draft was open for public input. Citizens can also engage with local government officials who represent them and attend the Monument Advisory Committee Meetings and provide public comments there.
17630-4	Brent Tanner		The Utah Cattlemen's Association requests that the BLM and USFS reject the preferred alternative and make the effort to engage in meaningful and productive management planning efforts with the local county officials, State of Utah and community members. We ask that the federal agencies follow the law in management of landscapes and not manage by political preference. We request a better review including the input of stakeholders, county and state leaders, as well as the agency personnel familiar with the area be engaged before making land use decisions that will likely have devastating economic and social impacts on the local people.	PUBL07-Importance of Local Input	There are opportunities for input as consistent with the National Environmental Policy Act. The planning effort included multiple opportunities to provide input and attend public meetings during scoping and when the draft was open for public input. Citizens can also engage with local government officials who represent them and attend the Monument Advisory Committee Meetings and provide public comments there.
18315-3	LISA RARICK		I have concerns that of the five participating entities included in the Bears Ears Commission, 3 tribes dont have any current boundaries close to the monument. In addition, the local county, cities, and town in closest proximity were not consulted as part of the planning process until the end with limited time to delve into the complex documents being provided. Navajos, Utes, Caucasians (especially descendants of early pioneer settlers), and Hispanics that have inhabited these areas together for almost 150 years have worked together to care for the land, respect each others cultures, and keep the Anasazi dwellings, Puebloan Kivas, Spanish explorer trails, and old pioneer homesteads protected and respected. It seems a bit lopsided that not all parties have been considered as part of the planning process. Instead we are relegated to making comments on plans that have been developed by outside parties whose homes and livelihoods wont be personally impacted.	PUBL07-Importance of Local Input	Determining membership of the Bears Ears Commission is out of scope for this RMP/EIS. See consultation and coordination Appendix O. The agencies invited the City of Blanding San Juan County, the State of Utah and various state and local government agencies to participate and included their input into the Proposed Plan
18677-10	Benjamin Bellorado Tucson, AZ		The BLM, NFS, BEC, and education organizations should also make greater efforts to include the local communities and community members of Bluff, Blanding, Monticello, Moab, and surrounding communities of Native Americans and Anglos in their programs and activities.	PUBL07-Importance of Local Input	See the Cross-Cultural Education and Outreach section in Chapter 2. The Proposed Plan includes collaborating with the BEC and Tribal Nations on interpretation in BENM and emphasis on highlighting landscape connections
18677-5	Benjamin Bellorado Tucson, AZ		Once the new management plan is decided upon and implemented, I suggest that federal land managers organize a large conference where researchers working in the monument currently or in the past can come together with land managers and the BEC to discuss where were at in terms of understanding the ancient people of the moment and larger area. This should be done in the spirit of knowledge sharing so that a variety of stakeholders, including the new generation of BENM managers, as well as members of the BEC, and other tribal members can learn about the long history of research and conservation in the area. Through efforts like these, we can all begin to develop a new path forward where we can all work together with common goals and understandings. At present, the various stakeholder communities are wandering in different directions with different goals and disparate understandings of where we are in terms of existing knowledge and potential avenues for future collaboration.	PUBL07-Importance of Local Input	Organizing a conference of this type is outside the scope of this RMP/EIS. See the Cross-Cultural Education and Outreach section in Chapter regarding incorporating traditional Western Science and Traditional Indigenous Knowledge into the management of BENM.
18556-4	Stan		The preferred alternative emphasizes special interests of environmental groups like SUWA and the tribes, but does not represent the voices of many local residents, the State of Utah, and much of the general public, including our family. Many cultural sites are related to pioneers and early settlers, miners, and ranchers. Their decedents should have a larger say in how these sites are managed.	PUBL07-Importance of Local Input , ALT05-Alternative E	The agencies collaborated with multiple state, local, and federal agencies in the development of the Proposed Plan. The agencies also consulted with the Utah State Historic Preservation Office and local governments on cultural resources that may be affected by the Proposed Plan. See the consultation and coordination Appendix O, for a summary of the agencies consultation on the Proposed Plan and Final EIS.
17601-9	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	The RMP/EIS should provide for ongoing collaboration and coordination with adjacent land managers, cooperating agencies, and livestock producers concerning cooperative range management across the BENM landscape.	PUBL07-Importance of Local Input , GRAZ01-General	Under the Proposed Plan, the agencies will work with permittees on developing grazing permit terms and conditions, rangeland conditions, and grazing practices necessary to make progress towards meeting rangeland health standards. See the Management Actions Common to All section of the Livestock Grazing section in Chapter 2, the agencies will continue to coordinate, as appropriate, with local governments and adjacent land managers.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18112-2	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	Blanding City is especially worried that the proposed revisions to the Plan will interfere with the Citys ability to manage its water supply, including making critical improvements or repairs to its water infrastructure. Water is critical in the arid West, and it has a unique place in Blanding Citys founding and growth. For this and the other reasons described in this letter, Blanding City urges the Bureau to change course, revise its proposal, and engage more meaningfully with the local communities like Blanding City that will bear the negative impacts of the revised Plan.	PUBL07-Importance of Local Input , WAT01-General	The agencies will continue existing ROWs and ROWs can still be considered within BENM. See Chapter 2 for ROW related management actions. Based on feedback from cooperating agencies, the agencies made changes to the Proposed Plan including coordination with the with local governments where appropriate to ensure coordination on management of the Monument and implementation of the RMP. Additionally, the agencies in the Proposed Plan added ROW open areas along paved highway and added more ROW avoidance areas. Agencies would coordinate with local governments on specific implementation level management that follows this plan.

Table U-22. Recreation

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19017-16	Sylvia Stubbs	San Juan County	In Alternative E campfires are restricted to metal rings where available or to fire pans with ashes being hauled away. This very restrictive prescription for campfires may be OK for analysis purposes in a range of alternatives but is not reasonable or necessary for the entire BEM. Considering the vast expanses of the 1.36 million acre monument, there are many areas where visitation and camping occur infrequently or at levels that do not cause problems with monument objects or detract from the landscape. It would be more reasonable to select an alternative where restrictions on campfire use would be implemented only where necessary at sites where camping and campfire use are causing a problem.	REC01	This RMP/EIS analyzes a range of management actions regarding human waste, campfires, and camping that address potential impacts to cultural resources and other BENM resources. In the Proposed Plan, campfire restrictions vary by management area. See Appendix E for details on campfire restrictions.
19017-36	Sylvia Stubbs	San Juan County	Figure 2-28 is not labeled as to which alternative it represents. In Volume 1 under 2.4.20 Recreation and Visitor Services subsection 2.4.20.2 Management Common to &Alternatives, the 4th bullet statement refers to Figure 2-28 as representing ROS classes in all alternatives. From this statement a reader of this document would logically conclude that ROS classes in this figure depict ROS classes in all alternatives including Alternative A. This would be a false conclusion as the figure does not represent current ROS classifications in Alternative A. Figure 2-28 shows more non-motorized ROS class areas than are currently present in Alternative A. One example is the Davis Canyon-Seven Sisters area shown as SPNM but is in fact SPM in the 1986 Plan. Figure 2-28 gives the public the impression that ROS class areas would not change from the present when in fact they are changed in the action alternatives. This misconception skews the public's understanding of changes proposed in ROS classifications and hinders their ability to make meaningful comments on the EIS. This same inaccuracy is also depicted in Figure 3-39, Table 3-133 and in the "FS BENM ROS Draft" layer of BLM's e-planning interactive map. Please correct this inaccuracy by labeling Figure 2-28 as applying to Alternatives B-E, adding a figure depicting current ROS class areas for Alternative A and correcting Figure 3-39, Table 3-133 and BLM's interactive map.	REC01	The Final EIS includes updated maps to reflect all alternatives, including the Proposed Plan. The content in the Recreation and Visitors Services Management Actions Common to All Alternatives has also been updated to reflect the changes. Under the Proposed Plan and Alternative E, NFS lands will be managed using Recreation Zones.
19017-40	Sylvia Stubbs	San Juan County	2.4.20 Recreation and Visitor Services p.2-80 Management Common to All Action Alternatives The h bullet statement includes " ... the cultural landscape of the Monument requires rest during certain seasons of the year." This is an open ended statement without specifics so it is unclear what may develop from such a statement. It would help if specifics could be included so as to better understand and analyze the impacts such action(s) may have on uses in the BEM.	REC01	Under the Proposed Plan, the need for seasonal closures would be determined in collaboration with the BEC, and these closures may relate to the protection of any BENM objects. The Recreation and Visitor Services section of the Proposed Plan provides some additional information of these closures, and closures are discussed in the analysis Recreation Use and Visitor Services in Appendix N. Seasonal restrictions and closures are being evaluated and considered as part of the Alternatives analysis. Year-round closures are not being considered. Resource rest could include the raptor nesting closures referred to in the comment, as well as rest that occurs during the winter and summer.' Resource rest would be implemented in coordinated with the BEC. Various options for resource rest and closures would be analyzed as a part of implementation level planning.'
1818-1	Toni Ward		Climbers need more information regarding potential permits and fees for climbing activities.	REC01	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
1818-2	Toni Ward		Under the draft new routes would require authorization, but currently the conditions and standards by which land managers will make these decisions are unclear. Were urging the BLM in coordination with the BEC to programmatically authorize new fixed anchors in the Indian Creek zone of the monument.	REC01	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
18275-13	Jamie Ervin	Outdoor Alliance	Alternative E would prohibit paragliding, hang gliding, base jumping, wing-suit flying, geocaching, and rock stacking, while noting that these are inappropriate activities in the Bears Ears cultural landscape according to Tribal expertise and Traditional Indigenous Knowledge.32 While Outdoor Alliance does not outwardly represent any of these activities, members of our community nonetheless participate in some of these pursuits. The Final EIS should provide significantly more detail about why these activities are inappropriate.	REC01-General	Very few visitors to the BENM region participate in most of these activities except for stacking rocks, otherwise known as cairning. Although creating cairns is a common activity on the landscape it can create a safety issue due to visitors getting lost. The agencies have documented impacts to cultural resources from rock stacking across the landscape.
7958-5			The public lands in BENM are experiencing an increase in bicycle use. This activity needs additional regulation and clarification in both the BLM's regulations and in its signage program. Mechanized and motorized vehicles should generally be managed in the same way unless the BLM designates a specific trail for bicycles. Current BLM signage too often only notes route closure to motorized vehicles when it should be closed to all mechanized and motorized vehicles.	REC01-General	Under the Proposed Plan, mechanized travel is allowed wherever motorized vehicles may go and may also travel on trails specifically designated for mechanized use. Unless a non-motorized trail is specifically designated for mechanized use, it is not open to mechanized use and is subject to the same closures as motorized use.
889-109	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Simply put, interpersonal conflict involves actual on-the-ground conflicts between user groups sharings the same trails, while social values conflict consists of ideological opposition by one group to allowing another user groups activity to take place on public lands. Scientific analysis defines these two forms of conflict as follows: For interpersonal conflict to occur, the physical presence or behavior of an individual or a group of recreationists must interfere with the goals of another individual or group. Social values conflict, on the other hand, can occur between groups who do not share the same norms (Ruddell & Gramann, 1994) and/or values (Saremba & Gill, 1991), independent of the physical presence or actual contact between the groups. When the conflict stems from interpersonal	REC01-General	The Proposed Plan, and later implementation-level travel management planning, does and will consider the body of research on recreation conflict, including review by the Congressional Research Service, which documents interpretation of the interchangeability of "use" and "user" related to this topic as grounded in BLM policy handbooks 1221-2, 2930-1 and 8320-1, through rulemaking in 67 FR 61732, and documented in other associated guidance. The agency has the authority to manage recreational uses through implementation level travel management planning following the process outlined in BLM H-8342 Travel and Transportation

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			conflict, zoning incompatible users into different locations of the resource is an effective strategy. When the source of conflict is differences in values, however, zoning is not likely to be very effective. In the Mt. Evans study (Vaske et al., 1995), for example, physically separating hunters from nonhunters did not resolve the conflict in social values expressed by the nonhunting group. Just knowing that people hunt in the area resulted in the perception of conflict. For these types of situations, efforts designed to educate and inform the different visiting publics about the reasons underlying management actions may be more effective in reducing conflict. ³⁴ Other researchers have distinguished types of user conflicts based on a goals interference distinction, described as follows: The travel management planning process did not directly assess the prevalence of on-site conflict between non-motorized groups accessing and using the yurts and adjacent motorized users. The common definition of recreation conflict for an individual assumes that people recreate in order to achieve certain goals, and defines conflict as goal interference attributed to anothers behavior (Jacob & Schreyer, 1980, p. 369). Therefore, conflict as goal interference is not an objective state, but is an individuals appraisal of past and future social contacts that influences either direct or indirect conflict. It is important to note that the absence of recreational goal attainment alone is insufficient to denote the presence of conflict. The perceived source of this goal interference must be identified as other individuals.		Handbook. The handbook states: "Areas, roads, and/or trails are designated closed if closure to all OHV use is necessary to protect resources, promote visitor safety or reduce user conflicts." Motorized routes will be designated under travel management planning, which will be an implementation-level effort. OHV closed area designations are not made out of a preference for one kind of recreation over another, but rather to provide adequate protections to Monument objects, special designation areas, and other resources. Under the Proposed Plan, motorized use would be allowed in Arch Canyon under a permit system. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18965-20	Simone Griffin	BlueRibbon Coalition	Restricting drone use for the purpose of filming and photography is a violation of 1st Amendment rights. Requiring a special permit is still in violation of these rights. It should also be recognized that if commercial film permits are unconstitutional, then non-commercial filming is also an activity protected by the First Amendment. Most drone users use their drones for the purposes of filming, and federal agencies should only regulate this activity through the least restrictive means possible with the understanding that the same safety concerns and resources concerns that exist in National Parks also exist in lands managed by the BLM and USFS. Safety and resource concerns werent enough to justify film permit requirements in National Parks. Drone use is already regulated by the FAA and the BLM/USFS should stay in their own jurisdiction. Drone users who have gone through the FAA permitting process shouldnt have their 1st Amendment rights curtailed by duplicative policies that are bluntly applied by the BLM/USFS.	REC01-General	Drone use in airspace is managed by the Federal Aviation Administration Civil Operations Part 107. However, the agencies have the authority to manage the casual use landing or taking off of drones on BLM- and USDA Forest Service-administered lands. Additionally, the agencies have the discretion to dictate all aspects of drone use if that drone is being used as part of a permitted activity. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion. Restrictions on drone use in the Proposed Plan for the purpose of protecting BENM objects is consistent with applicable law.
3119-2	Dennis Nelms		As a climber, this area is significant for the people outside of this region even by myself here in Arkansas. Who better to manage this area than the indigenous people of this area. If they see the value in climbing along side there poeples, that would be amazing but it is truly their decision as we move forward we need to be respectful of that.	REC01-General	The Proclamation requires that the agencies ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations. Under the Proposed Plan, agencies, in collaboration with the BEC, would work with climbing organizations and SRP holders to educate climbers on the cultural landscape of BENM and cultural resources.
11232-2	Andy Butler		The statement on Page E1: BEC does not recognize recreation as an appropriate use to be disingenuous and recommend the language be altered or removed in the final Management Plan. Recreation will happen, it needs to be managed.	REC01-General	The BLM and USDA Forest Service manage a variety of recreational uses and will continue to do so under the Proposed Plan.
11232-3	Andy Butler		In this regard, It isnt clear from the maps (e.g. Fig 2-31) if Point Lookout Canyon is considered in a RMZ.	REC01-General	Point Lookout Canyon is not included in a Sub-Area in the Proposed Plan. Please see the interactive map available on planning, which allows for comparison of data at a fine scale.
11232-4	Andy Butler		I realize the BEC isnt enamored with recreational use of BENM. However, hiking and backpacking are traditional uses.	REC01-General	The BLM and USDA Forest Service manage a variety of recreational uses and will continue to do so under the Proposed Plan.
11232-5	Andy Butler		Likewise, it isnt obvious from the maps (at this scale) if, in the Mancos Mesa area, the North Gulch and Moqui Canyons are included in a designated RMZ.	REC01-General	The areas referred to in the comment are not included in a Sub-Area in the Proposed Plan. Please see the interactive map available on planning, which allows for comparison of data at a fine scale.
12438-4	Josh Ewing PO Box 328 Bluff, UT 84512		For example, there is not a single designated public use site along the Comb Ridge between Highways 163 and 95. While this stretch contains thousands of sensitive sites, visitors are given no direction as to where they can have a good experience while being provided education on Visit with Respect principles. By failing to provide a single public use site in this stretch in any of the Alternatives, this plan fails to provide a reasonable range of alternatives to protect the landscape.	REC01-General	Under the Proposed Plan, the agencies, in collaboration with the BEC, would identify appropriate sites within the Passage Zone along Butler Wash Road for development as public use cultural sites as part of the RAMP. Trails from parking areas to public use cultural sites would be designated and signed, and the sites would be hardened or otherwise made visitor ready. (See Appendix E, Comb Ridge Sub-Area).
1417-1	Kenton Brown		However, we climbers need more information regarding potential permits and fees for climbing activities. How will permits be obtained? Will there be a maximum number of permits issued each day? Will they be free or will they come at a cost?	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
1417-2	Kenton Brown		We climbers also support programmatic authorization for establishing new routes that require anchors. Ideally this authorization process can be made streamlined for everyone involved.	REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
14539-2	Rebecca Gillis		Being able to fully understand the impacts of the future management and stewardship of BENM via the guidance provided in Alternative E will allow us to accurately communicate the plans to our members and to continue galvanizing support for the preferred alternative across our community. To fully understand the impacts of Alternative E, we request clarification on the following components: 1. Human-Powered Recreational Uses: More detailed guidelines on allowable recreation activities across the four proposed management zones are needed. Our members rely on access to conserved areas	REC01-General	See Proposed Plan Zone descriptions in Management Actions by Alternative in Recreation Use and Visitor Services and Supporting Information for Recreation and Visitor Services Decisions in Appendix E, (Recreation) Table on Zone Indicators for Bears Ears National Monument for a list, which give more specificity regarding allowable infrastructure and uses, including access types, for each zone.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			for human-powered recreation, and we would appreciate a more direct prescription on which types of human-powered recreation will be allowed where. Relatedly, clear guidelines on recreation infrastructure maintenance and installation allowed in each zone is essential in order to better understand the long-term impacts on access to recreation throughout BENM.		
15184-2	Derrick Nedzel 4460 Yarrow St Wheat Ridge, CO 80033		I would like to understand more about how new route approvals would be handled - how would those decisions be made? What are the concerns and how can these be addressed when proposing new routes?	REC01-General	Route by route travel planning will be completed under an implementation level Travel Management Plan. Implementation-level travel planning would not designate new motorized and mechanized routes in riparian areas, wetlands, and water resources unless necessary to ensure the protection of BENM objects and in collaboration with the BEC. Implementation-level travel management planning would ensure motorized and mechanized routes that parallel or cross streams would be located to best complement riparian and aquatic ecosystems as well as road/trail and stream geometry. This includes locating crossings (fords) at points of low bank slope and firm surfaces wherever practicable. Improvements to routes, including potential reroutes or alternative alignments, to provide for public health and safety needs and/or to protect BENM objects, would be considered during plan implementation on a case-by-case basis, in accordance with agency policy. See Appendix H: Travel Management Plan Criteria.
15184-3	Derrick Nedzel 4460 Yarrow St Wheat Ridge, CO 80033		I'd also like to understand any permitting process for climbing that would be put in place. Indian Creek has become a world famous climbing destination due to its beauty and the quality of rock for climbing. I would hope the permitting process would be available to US and foreign climbers while they are planning their trips so that no one travels thousands of miles only to be turned away.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
15334-4	Bailey Brennan	National Wildlife Federation	The proposed Management Zones would allow for management decisions, such as closures to avoid impacts to cultural resources, designated routes for travel, the placement of future developed recreation sites, or management of invasive species, to be based on the criteria developed with the BEC for that zone and to set overarching goals for visitor experiences, needs, and expectations. Management Zones would also allow the agency to proactively identify and protect less visited, more sensitive areas in the Monument, including important wildlife habitat and cultural resources.	REC01-General	The Proposed Plan employs a zoned approach to recreation management.
15396-3	Kristen Henry		Responsible recreation is essential, and hopefully an effective and enforceable plan can be put in place that should perhaps utilize RMZ's, and prioritize WSA's, LWC's, and ACEC's.	REC01-General	The Proposed Plan employs a zoned approach to recreation management. The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details). Designation of WSAs is outside the scope of this planning effort. See Natural Environment (Vegetation) for LWC and Natural Environment (Forestry and Woodlands) for ACECs.
15439-20	Jason Keith Moab, UT 84532	Access Fund	We also believe that the Agencies should retain subzone planning designations for recreational uses to better plan for and manage the many unique and special locations within BENM. These designations would not necessarily need to be the typical BLM planning conventions (SRMAs, ERMAs), but should provide clear boundaries for subzones within the larger management area zones (Remote, Outback, Passage, and Frontcountry) envisioned by Alternative E in order to provide more tailored and specific planning and management.	REC01-General	The Proposed Plan employs a zoned approach to recreation management.
15439-5	Jason Keith Moab, UT 84532	Access Fund	The range of alternatives in this draft RMP provide contrasting options for managing BENM. Generally, the Climbing Organizations support the preferred Alternative E that would focus visitor use infrastructure near population centers, highway corridors, and high use areas, maximize the consideration and use of Tribal perspectives on managing the landscape of BENM, and generally limit recreation facilities to designated campgrounds, trailheads, and other areas where there is a concentration of recreational users. This approach would provide balanced management and limit new uses and infrastructure in the BENM. Alternative E would also use on-the-ground presence from Agency staff, Tribal ranger programs, site stewards, and volunteers as a tool to protect BENM objects, and provide visitor education to protect the cultural landscape. Furthermore, specific management plans or directives would be developed for areas of BENM that experience year-round or seasonal use that requires greater management prohibitions to protect Monument objects. Examples included areas of special designations, such as TCPs, ACECs, or other cultural and/or resource-specific requirements guided by Monument proclamations or other federal laws. Regardless of which alternative is elected, the Climbing Organizations believe the Agencies should develop a dedicated plan for the Indian Creek Corridor to address management issues such as climbing and fixed anchor authorizations, camping, trails, recreation management infrastructure, and educational projects.	REC01-General	See Appendix T for the priority deadlines for implementation level plans. The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details).
1553-1			Climbers need more information regarding potential permits and fees for climbing activities.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.

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1553-2			Climbers support programmatic authorization for establishing new routes that require anchors.	REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1559-1	Miles Crawford		Please work closely with the Access Fund to promote responsible and active climbing recreation within Bears Ears.	REC01-General	The agencies appreciate the ongoing partnership with the Access Fund.
1659-7	Eve Tallman UT		Fixed anchors for rock climbing routes are an acceptable concern for Monument managers. It is my hope that a process for screening new routes or first ascensionists is modeled after successful programs in other parks such as Boulder Mountain Parks in Colorado or the City of Rocks National Preserve in Idaho. In any case, involvement of local climbers or climbing advocacy groups will enrich the understanding of park and tribal officials tasked with overseeing a new fixed hardware program.	REC01-General	See the Proposed Plan under Recreation in Impacts in the Proposed Plan, in particular the activities section. Also see Appendix E (Recreation Activities). The agencies will consider new climbing routes as part of the implementation level Recreation Area Management Plan for Indian Creek. The Agencies will collaborate with the BEC on authorization of new routes. The agencies will also continue to work with climbing organizations on implementation level actions and consider existing programs that authorize climbing routes.
1689-3	Ralph Ferrara UT		On page 3-17, it is stated that rock climbing is the only form of recreation that is likely to have impacts to geological resources due to improperly placed gear damaging rocks or from climbing on wet sandstone, which could damage or break rocks. The concept of improperly placed gear needs more explanation. If improperly placed bolts are what is meant, this is an unnecessary element of the management plan, since improperly placed bolts need to be removed and are extremely rare, to the point of being a non-issue. If improperly placed camming devices are thought to cause geological damage, again, this is such a rare occurrence as to be a non-issue. It seems clear that the source of this concern does not understand rock climbing equipment or permanent fixed anchors. In reference to climbing on wet sandstone and breaking holds, there is a robust public information campaign, nation-wide, educating climbers about the problems of climbing on wet sandstone. The damage caused is recognizable to climbers, but an average visitor, or certainly a geologist, would not register the minute damage, although it is a big deal to climbers, who distinguish between climbing holds far smaller than one inch in size. The BLM-operated Red Rock Canyons National Conservation Area posts signs at each trailhead warning climbers against climbing on wet sandstone. Any rules regarding seasonal closure of an area due to wet sandstone would be unenforceable.	REC01-General	See changes to impacts analysis under Recreation Use and Visitor Services in Chapter 3.
1689-7	Ralph Ferrara UT		There are many references in the draft regarding designated camping in specific areas of the monument. If a permit system were to be developed similar to the pilot project in Grand Staircase-Escalante, I feel it could be manageable. The proposal (2-93) that no camping near overlooks in the Canyon Rims areas requires an explanation.	REC01-General	Models for permitting such as those used in Grand Staircase-Escalante National Monument could be considered under a range of alternatives in implementation-level planning. The policy for camping in the Canyon Rims area is a continuation of the existing RAMP for Canyon Rims and the 2008 Moab RMP which does not allow for camping within a 1/2 mile of a developed recreation site.
1712-2	Mike H		I need more information regarding potential permits and fees for climbing activities.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
1715-1	Chris Ulizio		There are a few areas that need more clarification though: 1. Potential permits and fees for climbing use 2. Details and timeline for programmatic authorization of establishing new routes	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1726-2	Davis Smith		We need more information regarding potential permits and fees for climbing activities.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
17326-1	Ben Muhlestein		On page 2-80 under management actions common to all plans. The pet requirements seem excessive for the entire monument. When this says that pets must be under control or not harass wildlife, does that include the legal chasing bears and cougars with dogs? For campers who bring dogs, taking and storing or burying pet waste seems an excessive requirement.	REC01-General	The Proposed Plan more clearly defines exceptions to the term "pet," to exclude dogs when actively engaged in activities such as hunting and herding, and also service animals. The Proposed Plan defines areas that are not appropriate for off leash pets developed in consideration of potential impacts that could result from pet use, related to Visit with Respect practices, and where appropriate, manageability considerations.
1750-2	Daniel Greenwald		Climbers need more information regarding potential permits and fees for climbing activities.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
1750-3	Daniel Greenwald		Climbers support programmatic authorization for establishing new routes that require anchors.	REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1792-6	Ann Wain		Implementing a zoned approach to recreation management.	REC01-General	The Proposed Plan employs a zoned approach to recreation management.
18153-1			As a climber, I appreciate that the draft plan allows for the continued use and maintenance of existing climbing routes. However, Im concerned about sustainable and affordable access to the area. I would like to see more information regarding potential permits and fees for climbing and any new policies for establishing new routes that require new anchors. Im concerned that a permit system could limit access for those of us who live here or make recreating in the area unaffordable for lower-income people.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1817-3	Michele Dieterich 2099 Silver Ridge Rd Hamilton, 59840		Permits should be required for climbing. As numbers overwhelm other uses and wildlife, they must be curtailed or decreased. No new climbing routes should be allowed in the monument. Use what is there. Leave the rest of the area to be protected from overuse.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1818-3	Toni Ward		Implementation-level plans are coming soon, but when they will be developed, what will be in them, how they will regulate recreation in the monument, or how they will be implemented is unknown. - What is the plan for managing the monument in the interim, before the detailed, implementation-level plans are completed? Because this is an exciting new opportunity, finalizing the plans will take time. The plan references day-use permits but is not specific about whether or not they will be free, how much they might cost, mechanisms for enforcement, where visitors will get them, or whether they will apply to climbing activities. -Can the BLM provide assurances that sustainable climbing access will be supported in the plan?	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Implementation plans will be developed during implementation-level planning and more detail will be provided at that time.
1820-2	Steven Swenson 6407 Brooklyn Ave NE Seattle, WA 98115		Climbers need more information regarding potential permits and fees for climbing activities.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
18275-12	Jamie Ervin	Outdoor Alliance	We also ask that the agencies reconsider their proposal to require permits for day use in all canyons. ²⁴ While it is unclear what is intended by all canyons, we interpret this to potentially mean that day use permits will be required for all visitors to BENM. The DEIS provides little detail about this new permit requirement, which will be tedious for visitors and will require substantial resources from the agencies to implement. The Final EIS should clearly justify the need for this new permit requirement and should evaluate whether other management options might meet this need. This is especially confusing for activities and areas that are already permitted, such as the San Juan River. Currently, people interested in undertaking a self-guided trip down the San Juan River must win a permit through a lottery system to access the river and then acquire a separate permit to hike or camp on river left on the Navajo Nation. If there were a third permit required that had yet another process, it would be overly cumbersome and lead to confusion. During a May 1 presentation on the DEIS, the Bears Ears Intertribal Coalition expressed similar concern with the day-use permit requirement for all canyons, stating that was not something that the BEC had recommended.	REC01-General	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E.
1840-2	Ethan Rehkopf		Climbers need more information regarding potential permits and fees for climbing activities. Climbers support programmatic authorization for establishing new routes that require anchors.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1851-2			I need more information regarding potential permits and fees for climbing activities and strongly hope for programmatic authorization for establishing new routes that require anchors.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
18657-62	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Restrictions or elimination of access to rock climbing is disturbingly ironic given the RMPs goals related to conservation and protection of monument objects. Rock climbing is a sport in which the span of potential impact from human use is remarkably slim. The very action of climbing requires that those engaged traverse a specific route, which in the case of BENM, comprises singular cracks in the sandstone cliff face that are no more than a few inches wide. Furthermore, rock climbing as a sport embodies and advances a deep value and commitment for responsible stewardship of public lands17. The Leave No Trace (LNT) philosophy stands as a beacon of responsible outdoor ethics, guiding climbers toward environmentally conscious practices that protect and preserve the very landscapes they cherish. Throughout each stage of a climbing journey from the approach to the summit, and through the descent to camping or bivouac these seven principles serve as a compass, guiding climbers to minimize their impact and leave behind only memories, not traces. Climbers believe that they have the privilege of experiencing some of nature's most awe-inspiring vistas, and with that privilege comes a shared responsibility to protect them. By embracing the LNT principles, climbers embark on a collective mission to safeguard the beauty of climbing areas and leave them unspoiled for generations to come.	REC01-General	Under no alternative will there be complete elimination of access to rock climbing in BENM. While climbers in general follow LNT, the BLM, partner organizations, and individual climbers have documented and reported impacts to specific sites caused by climbing in Indian Creek, including those at the Pink Flamingo route and Ro Sham Bo area. Restrictions on climbing activity will be implemented for the purpose of minimizing impacts on natural or cultural resources as necessary.
1870-5	Jill K		As for potential permits and fees for climbing, and authorization of new routes requiring fixed anchors, the draft management plan leaves out important details. Climbers need more information about permits: would they be free or paid? How would the system be enforced? As a climber, I also support programmatic authorization for new route development within the Indian Creek area. I hope these concerns will be addressed in future recreation-focused management plans.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
18923-2			Blanket bans of specific activities such as base jumping, hang gliding, having dogs off leash: This seems arbitrary and capricious with no sound reasoning for the rather drastic rule change impacting visitors behavior. Evidence needs to be provided that such things are doing harm. There is a lack of substantiation of this claim	REC01-General	The agencies have considered a range of management decisions related to activities (recreation, pets) within BENM. The Proposed Plan analyzed pets in Recreation Use and Visitor Services and recreational uses in Management Actions in all Alternatives. The areas that are not appropriate for off-leash pets under each alternative were developed in consideration of potential impacts that could result from recreational uses and pets, in consideration of current Visit with Respect practices, and where appropriate, manageability considerations. The agencies would follow applicable law and conduct analysis and involve the public, consistent with Federal Law, when considering closures of public lands. See the Proposed Plan under the Recreation and Visitor Service in Environmental Consequences, for clarification to the language around rest and closures.
18965-21	Simone Griffin	BlueRibbon Coalition	Contrasted to those using conflict in a transparent effort to put a thumb on the scales of management balance, there are legitimate concerns that usually reflect the simple fact there are too many people trying to enjoy the same areas at the same time. These conflicts can occur within user groups or modalities as often as they occur between them. The agency should consider strategies to publicize and manage these situations. One option might be to designate nonmotorized companion trails along motorized routes or designate/groom nonmotorized only trails to Wilderness or nonmotorized land classification to reduce conflict of uses. Such efforts might be coupled with a targeted information campaign to direct nonmotorized uses to nonmotorized land classifications. Another element might be to consider enhanced staging/parking for nonmotorized users so as to provide better access to nonmotorized areas.	REC01-General	The agencies will consider the designation of routes and trails for public OHV use during implementation level planning and in accordance with applicable law, which requires the agencies to minimize user conflicts that stem from OHV use.
1906-8	Morgan Sjogren		Recreation management zones should be implemented as they have shown to be successful in Grand Staircase-Escalante National Monument,	REC01-General	The Proposed Plan employs a zoned approach to recreation management.
2146-6	James Thompson		I also support a zoned approach to recreation management, because that would maintain quality recreational experiences for all types of public land visitors while also protecting cultural sites and preserving backcountry resources. Zones also ensure landscape-level management by connecting low-elevation to high-elevation areas for wildlife migration, and linking to remote and undeveloped areas on surrounding lands managed by other agencies such as the National Park Service.	REC01-General	The Proposed Plan employs a zoned approach to recreation management.
3110-3	Shauna Archer 6277 West Freedom Hill Way Herriman, UT 84069		Recreation use should be made with idea of conservation and limited impact. For example, Utah has thousand of miles of recreational trails (ATV, Biking, hiking, horseback riding). These are profitable and viable outdoor recreation opportunities that also support tourism. However often these trials are not developed with preservation of the land/wild corridors or ecosystems in mind and sometimes can be harmful. Utah profits from outdoor recreation and should protect outdoor spaces so we can safely continue access in the long term.	REC01-General	A management decision common to all alternatives requires development of an implementation-level Recreation Area Management Plans for Management Areas to manage recreation consistent with the proper care and management of Monument objects and values. The implementation-level Recreation Area Management Plans will be developed after the adoption of approved RMPs and will allow for additional public and stakeholder involvement, American Indian Tribal consultation, and consideration of the preferred approach for camping management in BENM.
3473-2	Erik Neumann 610 N 65TH ST Seattle, WA 98103-5304		That said, I feel would like more information regarding potential permits and fees for climbing activities, and procedures for new routes that require fixed anchors.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
580-1	Thorsten Ostrander		A landscape-level, zoned management approach to recreation that focuses use and development in existing, developed areas, while protecting more remote, fragile locations, wildlife habitat and migration corridors, cultural sites and resources, and quiet, backcountry experiences. Closing Arch Canyon, an important riparian area with sensitive plant and wildlife species and cultural resources, to motorized use. Managing all lands identified as having wilderness characteristics for the long-term protection of those values.	REC01-General	Under the Proposed Plan, 205,721 acres of non-WSA LWC would be managed to protect their wilderness characteristics and 229,445 acres would be managed to minimize impacts on wilderness characteristics while allowing compatible uses that are consistent with the protection of BENM objects. The Proposed Plan employs a zoned approach to recreation management. Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. The permit system would be developed as part of the BENM Travel Management Plan in the future.
588-1	John Teevan 805 Hawksview PI Chula Vista, CA 91914		We need to ensure the protection and restoration of monument objects and values by including the following: - A landscape-level, zoned management approach to recreation that focuses use and development in existing, developed areas, while protecting more remote, fragile locations, wildlife habitat and migration corridors, cultural sites and resources, and quiet, backcountry experiences. - Closing Arch Canyon, an important riparian area with sensitive plant and wildlife species and cultural resources, to motorized use. - Managing all lands identified as having wilderness characteristics for the long-term protection of those values.	REC01-General	The Proposed Plan employs a zoned approach to recreation management. Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. The permit system would be developed as part of the BENM Travel Management Plan in the future. Under the Proposed Plan, 205,721 acres of non-WSA LWC would be managed to protect their wilderness characteristics and 229,445 acres would be managed to minimize impacts on wilderness characteristics while allowing compatible uses that are consistent with the protection of BENM objects.
6813-3	Debbie Justice		I am a proponent of Alternative Es zoned approach to recreation management. By using evidenced-based scientific methods to determine the specific best use for each small environmental 'patch' this allows for important protection of flora and fauna, fire mitigation and setting aside recreational experiences for all types of public land visitors. Zones are an important small-area specific way of protecting indigenous cultural sites as well.	REC01-General	The Proposed Plan employs a zoned approach to recreation management.
7339-4			I support the approach of Recreation Management Zones (RMZs), an effective method used In Grand Staircase Escalante National Monument and other public lands.	REC01-General	The Proposed Plan employs a zoned approach to recreation management.
7487-2	SAM FEUERBORN		I do ask that the process for climbers to develop new routes be made as simple and painless as possible as this is an important way that climbers give back to the community and could easily be a touchpoint that would prompt some climbers to break rules either intentionally or not.	REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
7958-2			CEDAR MESA AND THE GRAND GULCH PRIMITIVE AREA: This area needs additional law enforcement and park ranger personnel. Current levels of staffing remain either the same as the 1980s or even less. There needs to be a BLM presence on Cedar Mesa year around. Natural Bridges National Monument has unused housing that could be rented for BLM employee/volunteer housing, especially during the winter months when the KGRS housing has no running water. In 2023 the Kane Gulch Ranger Station had over 8,000 visitors in just the few months that the station was open. A visitor center that is open year around is critical to monument protection.	REC01-General	Agency staffing and funding levels are administrative decisions and are beyond the scope of the development of the RMP.
8305-4	Tracy Bodnar		Support continued recreation by the public in the Monument, utilizing Recreation Management Zones (RMZs), an effective method used in Grand Staircase Escalante National Monument and other public lands.	REC01-General	Proposed Plan employs a zoned approach to recreation management.
8424-2	Janet Slowman Chee		The other one is recreation. Of that, if we're seeing Bears Ears as a place to meditate, a place to be to yourself, to calm down, to ease your mind, where you give time to yourself, which is equivalent to a church, equivalent to maybe even a hospital, you know, where you have a mental health or overall well-being center, and they don't do that over here. They say, "Okay. We're just going to have fun here." To me, what I understand is that recreation it the four-wheeling. It's things that can displace the earth, the water, the animals, vegetation, and I think we really need to relook at the recreation piece of it, or maybe even a certain part of the Bears Ears can be for that, but the rest of it, we have to protect that.	REC01-General	Under the Proposed Plan, use of more than 15 riding and/or pack animals would require an SRP/SUP, unless otherwise specified in a Management Area or Sub-Area. Recreation is defined expansively by the agencies, and includes hiking, wildlife watching, scenic driving, visitation to cultural sites, and even religious retreats.
8575-2	Barry Burton		However, I would like to see more information regarding potential permits and fees for climbing activities. I think programmatic authorization for establishing new routes that require anchors makes the most sense to allow for new low impact climbing routes.	REC01-General	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
8732-3	Susan Markley PhD FL		A comprehensive river management plan for the San Juan River is needed as soon as possible; this plan should be developed with boating safety, conservation and protection of cultural resources as a priority over increased use. Consideration of limits on the size of rafting groups, whether professionally guided or not, maybe be needed.	REC01-General	The BLM will prioritize completion of an implementation-level plan for the San Juan River, which will align with protection of BENM objects and values as outlined in Proclamation 10285. Recreation is an allowable use to be managed, but not a object or value of the San Juan River in BENM as defined in the Proclamation.
889-36	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We also note that under other provisions of the draft management plan, bicycles will be mostly limited to designated motorized routes, so closing Arch Canyon to vehicles will also close it to bikes. There is simply no rational justification for taking this route away from two major user groups in order to award it solely to one. Such action reeks of a corrupt spoils system designed to favor one user group over all others rather than adhering to multiple use principles.	REC01-General	The agency has the authority to manage recreational uses through implementation level travel management planning following the process outlined in BLM H-8342 Travel and Transportation Handbook. The handbook states: "Areas, roads, and/or trails are designated closed if closure to all OHV use is necessary to protect resources, promote visitor safety or reduce user conflicts." Motorized routes will be designated under travel management planning, which will be an implementation-level effort. OHV closed area designations are not made out of a preference for one kind of recreation over another, but rather to provide adequate protections to Monument objects, special designation areas, and other resources. Under the Proposed Plan, motorized use would be allowed in Arch Canyon under a permit system. The permit system would be developed as part of the BENM Travel Management Plan in the future.
889-68	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We are concerned that the provision requiring a special use permit for any riding or pack animal use appears to apply to any equestrian use at all, even if by a single individual. This is simply absurd and will likely be completely unenforceable as no individual would ever suspect they need a special use permit simply to ride a horse anywhere in the monument. The provision only requiring a special use permit for A group size of more than 15 riding and/or pack animals in alternative A is far more reasonable.	REC01-General	Under the Proposed Plan, use of more than 15 riding and/or pack animals would require an SRP/SUP, unless otherwise specified in a Management Area or Sub-Area.
889-71	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	It is critical that the agency clearly define what is considered user conflict for purposes of Management Plan guidance. User conflict has proven to be a very slippery term when it comes to travel management processes, with a wide variety of meanings that are frequently conflated – most often to the detriment of motorized recreationists. While conducting any form of environmental analysis under NEPA, the Forest Service and BLM are obligated to use the best available science. This applies to user conflict analysis as well. Researchers have found that properly determining the basis and type of user conflict is critical to determining the proper method of managing this conflict. In particular, any analysis of user conflict must distinguish between interpersonal conflicts and social values conflicts, which studies have identified as two distinct categories of recreational user conflict on public lands.	REC01-General	Proposed Plan, and later implementation-level travel management planning, does and will consider the body of research on recreation conflict, including review by the Congressional Research Service, which documents interpretation of the interchangeability of "use" and "user" related to this topic as grounded in BLM policy handbooks 1221-2, 2930-1 and 8320-1, through rulemaking in 67 FR 61732, and documented in other associated guidance.
889-84	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Finally we note that the proposed drone restrictions in the preliminary alternatives contradict the general principles of recreation management. Land management agencies should consider phasing management actions by first selecting a less obtrusive approach (such as stewardship education) and observing visitor behavior over a specific time frame before implementing harsher restrictions. When it comes to drones, the agencies are taking the most restrictive approach possible first, mandating highly obtrusive restrictions in the monument management plan without ever having tried addressing specific concerns at a more localized level. This approach is inimical both to the recreation management approaches in the existing management plans and to the general principle of multiple use. We suggest that the best approach would be to establish this guideline in the recreation management section of the management plan, which was included in a recent Draft Forest Plan for the GMUG National Forest in Colorado: Promote education regarding responsible recreational use of unmanned aircraft systems to support compliance with all Federal Aviation Administration regulations and guidance. ³⁹ We strongly agree with this guideline and believe it is the only reference to drone use needed in the management plan. Education, not baseless restrictions, is the best way to promote responsible drone use in the monument that minimizes impacts on other users and wildlife.	REC01-General	The range of alternatives that was analyzed includes minimal restrictions on drones including, no prohibitions to only prohibiting them in Wilderness and WSAs as well as drone restrictions across the entire Monument. Restrictions on drone use in the Proposed Plan for the purpose of protecting BENM objects is consistent with applicable law.
889-88	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Finally we note that because Bears Ears National Monument contains extensive inholdings and noncontiguous areas, a total prohibition on drone flying in the monument will be ineffective and unenforceable. All it would mean is that drones could not be flown from federal land within the monument boundaries. Drones could still be flown perfectly legally from inholdings such as the numerous SITLA parcels found throughout the monument (which given the recent change in stance by the State of Utah are not likely to be transferred to the BLM under a land exchange in the foreseeable future), or from adjacent unrestricted federal lands such as the Canyon Rims Recreation Area on the mesa overlooking Lockhart Basin. Since the BLM and Forest Service have only a minimal law enforcement staff in the monument, they would be highly unlikely to ever catch someone in the act of flying a drone. The only way the prohibition against drone flying could ever be enforced would be after the fact, such as if someone posted a YouTube video of flying a drone in the monument. Even the FAA has had little luck using such videos as evidence in enforcement actions against drone operators, as it is often impossible to prove who was operating the drone or where it was operated from unless that is clearly shown in the video. The presence of numerous SITLA parcels throughout the monument where it would be legal to fly drones creates plausible deniability such that, unless the video clearly showed the operator flying the drone from an identifiable location within the monument boundaries, it would be impossible to prove the drone was flown from monument land. The end result is that regardless of whether drones are prohibited in the monument or not, people will likely	REC01-General	The BLM and USDA Forest Service will monitor and enforce the requirements outlined in the RMP to ensure the proper care and management of Monument objects and values. As necessary, the agencies may develop supplemental rules subsequent to the selection of the approved RMP to aid in enforcing the restrictions of the RMP.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			continue flying them, and the BLM and Forest Service will be unable to effectively enforce the prohibition. Any rules against drone flying will be a dead letter from the start, in which case why bother having them in the first place? This is yet another reason why the proposed drone restrictions are arbitrary and capricious and will not produce the alleged benefits the agencies claim.		
889-89	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Moving to the specifics of the proposed drone restrictions in the draft alternatives, we believe all new restrictions beyond those currently in place are unnecessary, impractical, and unworkable. Even some of the restrictions in the 2020 management plans are likely to be ineffective, as the public does not have adequate notice of what specific areas are restricted under terms like developed recreation sites and cultural sites, nor are members of the general public likely to know what an ACEC is or where they are. Nevertheless, if drones must be restricted in the monument, we favor the general approach to drone regulation in the 2020 management plans of identifying a few specific locations where drone use is prohibited while allowing it everywhere else.	REC01-General	Drone use in airspace is managed by the Federal Aviation Administration. However, the agencies have the authority to manage the casual use landing or taking off of drones on BLM- and USDA Forest Service-administered lands. Additionally, the agencies have the discretion to dictate all aspects of drone use if that drone is being used as part of a permitted activity. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion.
889-90	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We vigorously oppose alternatives C, D, and E which would prohibit drones across the entire monument, even in areas where other motorized travel is allowed. It is completely nonsensical to prohibit drones from being flown near roads and motorized trails, which already allow other forms of motorized devices. A good shorthand for understanding the current rules for flying drones on public lands is that if you can drive a vehicle there, you can fly a drone there. This makes inherent sense because drones are a kind of motorized device. That is indeed the very reason why they are prohibited in designated Wilderness Areas in the first place. The Forest Service and BLMs current approach sets the expectation that motorized devices are regulated consistently, at least in broad terms. Where motorized vehicles are prohibited, drones are prohibited; and where motorized vehicles are allowed, drones are allowed. Because they are aircraft, drones are not subject to travel management rules governing ground vehicles, but in most other respects they are managed similarly. Prohibiting launching and landing drones in areas where there are roads and motorized trails breaks that existing paradigm. It sets up the absurd scenario where the public may drive Jeeps, side-by-sides, dirt bikes, and other OHVs on roads and motorized trails but may not fly a drone from those same roads. While I am a Jeepster and fully support preserving opportunities for all forms of motorized recreation on public lands, there is no conceivable way that operating a drone from these roads would have greater impacts on wildlife or other recreationists than operating an off-highway vehicle on them does. It is utterly irrational, as well as arbitrary and capricious, to tell an OHV driver he may drive a vehicle on a road but not fly a drone from that same road to film his vehicle. This is not a theoretical issue. The crossover between OHV enthusiasts and drone owners is actually quite high. With the advent of newer drones that can automatically follow a vehicle while avoiding obstacles in their path, it has become a popular activity for offroaders to film themselves driving off-road trails with a drone following their vehicle.	REC01-General	Drone use in airspace is managed by the Federal Aviation Administration. However, the agencies have the authority to manage the casual use landing or taking off of drones on BLM- and USDA Forest Service-administered lands. Additionally, the agencies have the discretion to dictate all aspects of drone use if that drone is being used as part of a permitted activity. The range of alternatives analyzed in the RMP/EIS includes a full range of alternatives that address drone use where the agencies have discretion.
890-1	Steve Smith		I would like to see the management plan take that into consideration-and I appreciate how it already has by allowing for the continued use of climbing routes and the necessary maintenance of existing bolts on established climbing routes. I am also in favor of programmatic authorization for the maintenance and establishment of new climbing routes, including anchors in the Indian Creek region of Bears Ears National Monument.	REC01-General	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
8992-6	Olivia Juarez 1919 14th St, Suite 700 Boulder, CO 80302	GreenLatinos	We support Alternative Es zoned approach to recreation management. This provides quality recreational experiences for all types of public land visitors while also honoring and stewarding sensitive resources such as water, historical sites, wildlife habitat, etc. We appreciate the role that this zoning approach will play in stewarding wildlife corridors and promoting wildlife health across boundaries. We encourage recreation-oriented interpretive materials to include Spanish language translations in order to ensure that Spanish-dominant visitors can recreate with respect, learn about the significance of highly visited areas such as campsites, trails, overlooks, day-use sites, popular paleontological sites and destinations such as Mule Canyon Kiva, Butler Wash Ruins Overlook and Trail, the Newspaper Rock panel, and other cultural sites proposed for Public Use (Developed) status in Alternative E under the cultural resources section where existing interpretive materials exists, or are deemed necessary for ongoing stewardship. We also encourage Spanish language interpretation of existing or forthcoming information at basic facilities dedicated to passage zone information, and necessary off-site information provided for outback zone recreation. Public information about recreation zones defined by Alternative E should also be provided in Spanish. We also support any recreation and cultural resource interpretation to be provided in indigenous languages as deemed necessary by the Bears Ears Commission. More than 40% of Spanish speakers aged 18 and older in the U.S. do not speak English very well according to a 2023 U.S. Census report. Language access is an important dimension of making our public lands equitable for all to enjoy; ensuring that crucial information about the monument and at the monument is available in Spanish will encourage Spanish-dominant speakers to feel welcome at the monument and help end the severe lack of access and representation on public lands felt across Hispanic and Latino communities nationally. Recreational opportunities at the monument include visitation of paleontological and historical sites among other site-specific educational opportunities such as campsites. As such, we encourage including paleontological and historical sites in the zoning management, and support the application	REC01-General	The Proposed Plan states that interpretation and facility development will meet universal design standards to the extent practicable, and specifically gives use of different languages to enhance accessibly as an example. See the Management Actions By Alternative in the Cross-Cultural Education and Outreach Section in Chapter 2.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			of traditional ecological knowledge in paleontological resource management when information from the BEC is gathered.		
8999-32		International Mountain Bicycling Association	Trail-based activities like mountain biking are driven by, and dependent upon, the opportunity to interact with the unique features of well-protected and managed natural landscapes and therefore bicyclists support and advocate land protection measures while also expecting that managers take the necessary steps to manage for bike trail access purposefully. Demand for recreational access is the greatest resource we have for conservation. Specifically, recreational access, such as mountain biking trails, can contribute to the BLMs goals for protecting the BENM landscapes in several ways: Stewardship and Education: Mountain biking trails can serve as educational tools, providing opportunities for interpretive signage, guided tours, and organized events. These initiatives can raise awareness about the importance of environmental conservation, promote responsible outdoor practices, and educate visitors about the ecosystems and wildlife they encounter. By fostering a sense of stewardship, public access encourages individuals to actively contribute to the protection of the environment. Conservation Awareness: Public access to mountain biking trails increases people's exposure to the natural landscapes that BENM offers, fostering a sense of appreciation and connection to this environment. This is passed along generation to generation by experiencing the beauty and diversity of these areas firsthand. From this, individuals are more likely to develop a desire to protect and preserve them. Resource Allocation and Management: Establishing prescriptions for future designated mountain biking trails within the BENM can help concentrate recreational activity in specific and appropriate areas, reducing the potential for environmental damage caused by uncontrolled access and preserving intact landscapes and species or resources of concern. By carefully planning and managing future trails, land managers can direct visitor traffic away from sensitive habitats, water sources, and cultural sites, minimizing the ecological impact making management of the monument and special places and objects within it more effective. Economic Value: Mountain biking trails and public access to BLM lands can have significant and sustained economic benefits (yield) for local communities around the BENM. Visitors who come to enjoy these recreational activities contribute to the local economy by spending money on accommodations, dining, equipment rentals, and other related services. This economic value can and has incentivized UT communities and state government to invest in greater environmental protection measures and sustainable land management practices and/or helps provide an economy based on more sustainable uses and less reliant on boom and bust prone models that are intensive and resource consumptive. Collaboration and Partnerships: Public access to future mountain biking trails starts with this DRMP and can foster collaboration between land managers, IMBA local mountain bike user groups, and conservation organizations that better meet the goals of the Monument. By working together, these stakeholders can then work to help develop and implement the sustainable land use practices, conduct the research, and engage in the habitat restoration efforts set forth by the updated RMP. The involvement of diverse groups can lead to more effective and supported management strategies and an overall better balance that meets the environmental needs of the BLM field office.	REC01-General	Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
9100-4	David Robinson		These visitors cause many problems such as leaving trash everywhere, tearing up the vegetation and soil with their recreation vehicles, leaving gates open which enables cattle to go where they should not. They make camp sites all over the area ruining the landscape pooping and peeing wherever they choose.	REC01-General	The RMP/EIS considers various means to manage and mitigate the impacts of dispersed camping (see Alternative E, Recreation). Under no alternatives would there be OHV-open areas on BENM, meaning there can be no off-trail travel. Such management would limit OHV use impacts to natural and cultural resources.
18923-1			The BLM has existing designations, policies, and guidance to deliver protection to the Objects and Values cited in the relevant proclamations. These designations consist of Areas of Critical Environmental Concerns, Lands with Wilderness Characteristics, and even Special Recreation Management Areas. For these given designations, measurable objectives must be defined in the RMP.	REC01-General, ACEC01-General, LWC01-General	Appendix E defines measurable objectives for SRMAs, ERMAs, and RMZs for Alternatives B and C, and for MAs under Alternative D and the Proposed Plan. ACECs and LWC are not required to have measurable outcomes listed in an RMP (see BLM Manual 1613 and BLM Manual 6320).
1195-4	Lee Stanfield		You must implement a zoned approach to recreation management to help concentrate use and development for recreation where it is most appropriate to protect the monument.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
12438-11	Josh Ewing PO Box 328 Bluff, UT 84512		Furthermore, the mapped zones appear to highly limit crucial interventions that would help with managing cultural site visitation and human waste issues. For example, the highly visited Butler Wash area is in the Remote Zone, with no Passage Zone along the Butler Wash Road. Regarding what is allowed in the Remote Zone, the plan says: No new sites/facilities/trails would be developed in the Remote Zone; existing trails could be designated through implementation-level planning where consistent with protecting BENM objects. Signs would be allowed where necessary to protect BENM objects and after other management actions have been exhausted. This would appear to mean that no new bathrooms, parking areas, kiosks or trails could be created along the entire Comb Ridge, which would make it difficult to manage the areas high visitation in a way consistent with protecting monument objects, aligned with a strategic cultural site visitation plan, which would certainly need to designate at least a few public-use sites in this area.	REC01-General, ALT05-Alternative E	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenters concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
1273-4	Robin Poppen		Plan E would also be improved by adding a zoned approach to recreation management which is apparently currently utilized at Grand Staircase Escalante. I was just down there last week, and the BLM and Forest Service has done a terrific job in accommodating recreational uses.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
12832-3	Jason Keith 243 Aspen Avenue Moab, UT 84532	American Mountain Guides Association	As noted in the AMGA scoping comments to this plan, the AMGA supports planning provisions whereby all climbing routes, trails, and access points remain open but are monitored for impacts to cultural resources. If such impacts are observed, we believe the Agencies should first work to educate users and encourage self-regulation to minimize impacts before implementing broad use restrictions. BENM planners should continue working proactively with the climbing community to address and avoid conflicts and thus limit climbing closures.	REC01-General, ALT05-Alternative E	The Recreation and Visitor Services section of the Proposed Plan includes management stating existing access points, trails, and climbing consistent with protecting BENM objects routes would remain available for use but could be closed if site-specific impacts exist. These closures would be identified in accordance with applicable law. Additionally, the agencies would work with climbing organizations to educate climbers about the cultural landscape of BENM and cultural resources.
1293-5	Janet Kahan		Enact a zoned approach to recreation management in the final plan Adopting a zoned approach for recreation has worked at Grand Staircase-Escalante, and land managers should do it at Bears Ears too. Zoning will help concentrate visitors and recreation infrastructure in areas where it is most appropriate to protect the monument for future generations.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
1383-4	Southern Utah resident		Enact a zoned approach to recreation management in the final plan Recreation is a vital part of how people enjoy and experience Bears Ears, but recreation shouldnt be a free-for-all that crowds out traditional uses, plants, and wildlife. Adopting a zoned approach for recreation has worked at Grand Staircase-Escalante, and land managers should do it at Bears Ears too. Zoning will help concentrate visitors and recreation infrastructure in areas where it is most appropriate to protect the monument for future generations.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
15055-2	Robin Todd	Maryland Ornithological Society	Bar OHVs as necessary to reduce the density of motorized routes.	REC01-General, ALT05-Alternative E	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources and Geology section in Chapter 3 for a discussion of impacts of OHV designations on paleontological resources.
15055-6	Robin Todd	Maryland Ornithological Society	The final plan should establish a process for reviewing existing OHV routes and identifying those that are creating impacts against bird and wildlife habitat, cultural sites, or fossil sites. Such impacts are problematic especially where OHVs travel in riparian habitat, where vehicles cross streams or washes, or where they travel in a streambed. Any such routes should be closed and rehabilitated to restore the damaged habitat. MOS urges BLM and FS to bar ORVs in four specific places with important bird habitat: 1. Arch Canyon: MOS supports the closure of Arch Canyon to OHVs, as in Alternative E. Arch Canyon is listed as a Hot Spot for birds on the eBird website run by Cornell University Lab of Ornithology3. Our members saw habitat damaged by OHVs in Arch Canyon. Vehicles cross the creek as many as 60 times in driving up the canyon, without provisions against erosion, and another 60 times on the return trip, leaving trampled riparian vegetation and oil pollution in the water. At some places, vehicles actually travel in the streambed. Arch Canyon deserves better protection so its riparian habitat can be restored. It is a prime area for bird watching, day hiking and backpacking. It has been recommended in guidebooks such as Utah Hiking, by Buck Tilton, who lists it as one of the Top 10 Hikes to Ruins and Rock Art. 2. Lavender Canyon and Davis Canyon: Both have riparian habitat that has been damaged by OHVs. Both have long been proposed for addition to Canyonlands National Park and for wilderness designation as part of the Bridger Jack Mesa Wilderness in Americas Red Rock Wilderness Act (S.1310, H.R. 3031). When the National Park Service barred vehicles from Salt Creek Canyon in Canyonlands National Park, there was a dramatic regrowth of riparian wildlife habitat. The same regrowth can happen in Lavender and Davis Canyons if vehicles are barred. 3. Comb Ridge: MOS urges BLM and FS to bar ORVs strictly from Comb Ridge, between Butler Wash Road and Comb Wash Road. MOS members noticed that Comb Ridge, a long, narrow landform, serves as a spring migration route for birds, and its cliffs may host nesting raptors. Much of the surface is bare rock, and the rest has a thin soil cover supporting small thickets of scrub vegetation that shelters migrating birds. OHVs would do severe damage to this habitat. In addition, Comb Ridge is proposed for wilderness designation in Americas Red Rock Wilderness Act.	REC01-General, ALT05-Alternative E	Route by route travel planning will be completed under an implementation-level Travel Management Plan. Implementation-level travel planning would not designate new motorized and mechanized routes in riparian areas, wetlands, and water resources unless necessary to ensure the protection of BENM objects and in collaboration with the BEC. Implementation-level travel management planning would ensure motorized and mechanized routes that parallel or cross streams would be located to best complement riparian and aquatic ecosystems as well as road/trail and stream geometry. This includes locating crossings (fords) at points of low bank slope and firm surfaces wherever practicable. Improvements to routes, including potential reroutes or alternative alignments, to provide for public health and safety needs and/or to protect BENM objects, would be considered during plan implementation on a case-by-case basis, in accordance with agency policy. See Appendix H: Travel Management Plan Criteria.
15528-2	John Sterling 1976 NW 2nd St Bend, 97703-1204		The Preferred Alternative does away with unique Recreation Management Zones (RMZs) for places like Cedar Mesa, Comb Ridge and Indian Creek and replaces them with a one-size fits-all, Monument-wide system. While some consistency makes sense, the approach also limits the flexibility of the agencies to effectively manage unique areas. I encourage you to maintain the existing RMZs.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details).
15724-1	Rob Dillon 84532		Indian Creek is a currently a SRMA because it hosts the best crack climbing in the world, in quality and quantity, in a beautiful setting - this is its 'unique and distinctive recreation value' and, if we must, its "recreation setting characteristic"(RSC). In this way, it is a unique segment of the BENM and should be managed as such. Alternative E makes no distinctions in terms of managing this unique area, which is at once a lovely idea and ludicrously divorced from the reality of the world we currently inhabit. Management strategies should reflect reality, or they will likely be ignored, to the detriment of the BENM project and its perceived legitimacy. My hope is that the Indian Creek corridor continue	REC01-General, ALT05-Alternative E	Under the Proposed Plan, Indian Creek would be managed as a Management Area, which would allow for specific management direction related to the stated objectives, which include allowing for climbing.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			to be managed more or less as in Alternative A, which was recently and thoughtfully developed with the input of all stakeholders.		
16236-6	Michael Painter Californians for Western Wilderness, P.O. Box 210474 San Francisco, CA 94121	Californians for Western Wilderness	We do not support Alt. Es requirement of day-use permits for hiking in all canyons in the Monument. It is overly restrictive, and furthermore detracts from the Monument as a place for people, with a long history of human use. It might be acceptable if it simply required people to sign themselves in at a trailhead and put a corresponding tag on their dashboard. But requiring people to go to a visitor center in advance of their hikes is not in keeping with the spirit of the Monument. Day-use fees should not be required. If at some future date, it becomes necessary to modify visitor use regulations to require permits, due to damage to cultural sites or landscape, then adaptive management principles should apply.	REC01-General, ALT05-Alternative E	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E.
1667-2	Molly Malone		Page 2-102: "Permits would be required for private overnight and day use in all canyons." This is against the wild use of the area and adds unnecessary burden to both visitors and administrators. Who would manage the 100s of people to stay there every night? This is a bureaucratic nightmare for the BLM and for land users.	REC01-General, ALT05-Alternative E	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E.
1667-4	Molly Malone		Page 2-115 states: "Any new climbing routes that require the placement of bolts, anchors or fixed gear requires approval from the agencies, who would work collaboratively with the BEC..." While climbers appreciate that climbing is recognized as a valid use of land, the onerous anchor approval process is a non-starter. This kind of policy shut down all new routing at City of Rocks, ID. Most climbers will seldom stray away from already developed routes. However, there is still vast potential for more routes. Putting up new routes is in many ways a religious experience, influencing both body and the soul. Unfortunately, Alternative Es process will effectively prohibit all new routes, and null that experience for generations to come.	REC01-General, ALT05-Alternative E	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1689-8	Ralph Ferrara UT		Page 2-83 states that, under alternative E, management plans would be developed for all zones, including for recreation and interpretive plans, in order to protect Monument objects. This is very confusing, since the overall, extremely restrictive, Zone Map, would not allow for a more nuanced approach to land management that would come from a more focused recreation or interpretive plan. The overlap of the Zone Map, the Visual Resource Management Map, and area-specific recreation or interpretation overlays is incompatible. I feel the Zone Map and the VRM Map should be examined and revised. Although there may be some persons or groups who believe the entire monument has wilderness characteristics, this is simply not the case, and to designate the vast majority of the monument as Remote, with all the characteristics of wilderness areas or wilderness study areas, is in error. Page 3-405 acknowledges that camping is needed in Indian Creek and it has double the use of the rest of the monument. The vast majority of Indian Creek is heavily grazed and very close to the highway. Given the options of Zones, it is far more appropriate to designate most of Indian Creek as Front Country. This designation would enable responsible and responsive management of the recreation and interpretive sites, and would provide for development of campgrounds, vistas, shade structures, nature trails, parking lots and the like. Restricting this type of development by designating Indian Creek as wilderness from the outset is misguided and should be changed.	REC01-General, ALT05-Alternative E	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details). Much of the area mapped within the Remote Zone in the preferred alternative has been recategorized as Outback Zone under the Proposed Plan. This would allow for the development of recreational infrastructure to mitigate impacts.
17203-6	Richard Plummer		Adopting a zoned approach to Recreation Management offers visitors quality recreational experiences and provides for enhanced preservation and protection of cultural sites and back-country resources in the Monument. Careful zone designations also support wildlife migration and can provide linkage to remote and undeveloped areas on surrounding lands managed by other agencies such as the National Park Service.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
17326-2	Ben Muhlestein		Under plan E, the use of rock ring fires is prohibited in every zone. This is an unrealistic expectation of many dispersed campers, especially when many dispersed campsites already have well established fire rings.	REC01-General, ALT05-Alternative E	The Proposed Plan includes management actions regarding human waste, campfires, and camping that address potential impacts to cultural resources and other BENM resources.
17599-2	Byron Harvison 710 10th St, Suite 100 Golden, CO 80401	The American Alpine Club	Zones. Alternative E proposes the management of recreation through a zoned approach, designating four zones consisting of Front Country, Passage, Outback, and Remote. ⁵ This zoned approach would largely remove existing recreation management designations (such as Recreation Management Zones (RMZ) and Special Recreation Management Areas). The Indian Creek area, as an area of primary interest to the climbing community, would be largely located in the Outback and Remote Zones. ⁶ Indian Creek is currently designated as a Special Recreation Management Area (SRMA) ⁷ , and subject to the regulations associated with that SRMA such as dispersed camping regulations, regulations regarding interaction with archeological sites, wild species avoidance guidance, trail usage regulations, and more. The novel zone designations as written and applied to the zoning proposed for Indian Creek are unnecessarily restrictive and do not allow for future management flexibility. In Remote Zones no new sites/facilities/trails would be developed ⁸ and in Outback Zones no new sites/facilities would be developed ⁹ except for the possibility of minor recreation facilities such as trails, trailhead markers, and informational kiosks ¹⁰ when deemed necessary. These in toto exclusions do not provide land managers with the flexibility for future management concerns, which are easily accounted for in the existing SRMA and can be tailored in future SRMA or RMZ designations. We recommend utilizing a hybrid zone/designation system such as that utilized in the	REC01-General, ALT05-Alternative E	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details).

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			2020 Grand Staircase-Escalante National Monument Management Plan11 which allows for the development of SRMAs and RMZs that are more tailored within any zone, or sub-component of a zone, to address the specific management concerns of that zone and accounting for BEC collaboration in that decision-making process. The SRMAs and/or RMZs would be managed in accordance with the distinct recreation-tourism market for which they were created and in conjunction with the BEC.		
17599-5	Byron Harvison 710 10th St, Suite 100 Golden, CO 80401	The American Alpine Club	Closures. The draft plan states that, Existing access points, trails, and climbing routes that are consistent with the protection of BENM objects would remain available for use. If site-specific impacts exist, climbing routes can be closed and access trails and staging areas may be closed or rerouted and that, Climbing closures would be identified in accordance with applicable law. The AAC asks for clarification on what criteria would be utilized in the determination of consistent with the protection of BENM as well as the criteria that would be utilized to determine impact. We understand that the criteria could be dependent upon whether the closure is aimed to protect an ecological/biological resource such as raptors, or a cultural resource such as an archaeological site. We also seek clarification of the factors or criteria to be considered for determining a resource rest is appropriate to justify a closure, as well as how the length of time for a resource rest would be calculated.	REC01-General, ALT05-Alternative E	Under the Proposed Plan, the need for seasonal closures would be determined in collaboration with the BEC, and these closures may relate to the protection of any BENM objects. In Recreation Use and Visitor Services under Management Actions Common to All Alternatives of the Proposed Plan provides some additional information these closures, and closures are discussed in the analysis in Appendix N.
1826-8	George and Frances Alderson 112 Hilton Ave. Catonsville, MD 21228		Zone System: We favor a differentiation as proposed in Alternative E between the front country areas where the most visitor-use facilities can be built (such as roads, hardened trails and parking areas) and the back country where simple foot trails and minimal signage are provided. These can be considered a zone system for management of visitor use.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
18275-2	Jamie Ervin	Outdoor Alliance	The Final RMP should provide significantly more detail about how and when closures will be implemented, provide appropriate sideboards for subsequent decisions, and provide land managers with flexibility to address recreation impacts through other management actions (such as restoration projects) where possible. The Final RMP should also include clearer guidance for land managers to consider and establish recreational closures, both to delineate a clear process for decision making and to provide certainty to recreational users, particularly for uses and values identified in the monument proclamation. To achieve this objective, the Final RMP should incorporate the principles below for all recreation-related closures (including Resource Rest): Access restrictions should only be enacted to protect identified BENM objects and values and the visitor experience; Closures should be limited to the smallest temporal and spatial extent possible to address specific cultural and natural resource concerns; Closures should be based on the best available science and/or TIK, and, to the maximum extent possible, this supporting information should be provided to the general public to support a closure decision; Recreationists should be clearly notified of closures in advance, including the timing, duration, and extent of the closure; Closures should follow a clear decision-making process that includes opportunities for public input; Closures should be equitably applied across user groups; and Closures should be reviewed regularly and provide for monitoring and adaptive management to allow for reopening areas to recreation in light of changed conditions.	REC01-General, ALT05-Alternative E	For OHV limited BLM land within BENM, OHV routes would be analyzed individually through implementation level NEPA analysis, which would include involvement from cooperating agencies in addition to public involvement. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. For other types of closures, the agencies would follow policy for emergency or long-term closures. Any non-emergency closures would typically involve a NEPA process and public comment. Closures to recreational use might be considered as part of an implementation-level RAMP.
18556-1	Stan		The preferred alternative requiring campers to use fire pans and pack out ash is not feasibly enforceable and will do little to protect cultural or natural resources. There are likely hundreds, if not thousands, of existing fire rings in the 1.3 million acres of the monument. Most people will either be ignorant of the new rule, or will ignore it, and the majority of users will continue to use fire rings. At the very least, the rule should be amended to require fire pans only within a few hundred feet of a cultural site. If campers are required to pack out ash, is the BLM going to remove all the ash after a forest fire? (Of course not!) With this level of scrutiny, wood cutters should be required to pack out sawdust and remove ugly stumps after cutting down trees as well.	REC01-General, ALT05-Alternative E	The BLM and USDA Forest Service will monitor and enforce the requirements outlined in the RMP to ensure the proper care and management of Monument objects and values. As necessary, the agencies may develop supplemental rules subsequent to the selection of the approved RMP to aid in enforcing the restrictions of the RMP.
18668-1	Vanessa Soncco		Limits to new climbing routes should be decided with Bears Ears Commission approval and further Tribal consultation as thousands of hiking trails desecrate sacred mountains, rocks and cultural resources. Routes should be designated alongside the Tribes for all climbers.	REC01-General, ALT05-Alternative E	Management under Alternative E being considered for the Proposed RMP/EIS reads as follows: "Any new climbing routes that require the placement of bolts, anchors or fixed gear requires approval from the agencies, who would work collaboratively with the BEC to determine whether the route is appropriate to protect Monument objects, including cultural resources and wildlife, as informed by Traditional Indigenous Knowledge."
18711-1			My main objection with E is that it will close D2117 (Arch Canyon).	REC01-General, ALT05-Alternative E	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18858-1	Lucia Christensen		Page 2-115 states: "Any new climbing routes that require the placement of bolts, anchors or fixed gear requires approval from the agencies, who would work collaboratively with the BEC..." While climbers appreciate that climbing is recognized as a valid use of land, the onerous anchor approval process could shut down new route development entirely in the Indian Creek area. Most climbers will seldom stray away from already developed routes. However, there is still vast potential for more routes throughout the Indian Creek area. Unfortunately, Alternative Es process will effectively prohibit new routes.	REC01-General, ALT05-Alternative E	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18858-2	Lucia Christensen		Cultural resources must be protected, but it is imperative to identify these resources and mark them off for prohibited access. This would help protect resources that have already been impacted by bad bolting, in addition to protecting from future damage. A bolting ban would not necessarily protect resources from damage, and would hinder recreation in the area. If this comes to fruition, it is crucial that the permitting process have a timeline attached to it (I would suggest 30 days).	REC01-General, ALT05-Alternative E	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
3808-3	Nina Macheel		Application of a zoned approach to managing recreational visitors to protect backcountry areas for wildlife migration.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
6612-4	Skylar Casey Salt Lake City, UT 84108		Alternative E does have some opportunity for more clarification: Under the draft, new climbing routes would require authorization, but groups like the Access Fund have stated that they need to understand the conditions and standards by which land managers will make these decisions. I urge the BLM in coordination with the BEC to programmatically authorize new fixed anchors in the Indian Creek zone of the monument. Fixed anchors help keep climbers safe. The plan also references day-use permits, but is not specific about whether or not they will be free, how much they might cost, mechanisms for enforcement, where visitors will get them, or whether they will apply to climbing activities. This should be fleshed out in the plan and fees should be limited if possible.	REC01-General, ALT05-Alternative E	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
889-56	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We do not support the proposed rule in alternative E that would limit campfires to fire pans throughout the monument. While that may be appropriate in some heavily used areas, rock fire rings are completely appropriate places to have fires in most other areas and the ash from them does not cause any significant harm. Requiring people to pack out all ash from campfires across the entire monument seems excessive, and requiring people to carry bulky metal fire pans imposes significant inconvenience for campers who may not have enough space in their cars to carry them. People have been making campfires in rock fire rings for thousands of years in this landscape, and there is no evidence in the DEIS that such fire rings are causing any serious environmental impacts. The draconian step of banning rock fire rings throughout the entire monument and requiring campers to pack out all ash using bulky and expensive fire pans is simply not justified.	REC01-General, ALT05-Alternative E	This RMP/EIS analyzes a range of management actions regarding human waste, campfires, and camping that address potential impacts to cultural resources, recreation opportunities and other BENM resources. Construction and use of rock fire rings has the potential to impact cultural resources through inadvertent destruction when gathering rocks for building material. The Proposed Plan does not require fire pans in all areas.
9166-4	A BENM supporter		4. Please enact a zoned approach to recreation management in the final plan Recreation is a vital part of how people enjoy and experience Bears Ears, but recreation shouldnt be a free-for-all that crowds out traditional uses, plants, and wildlife. Adopting a zoned approach for recreation has worked at Grand Staircase-Escalante, and land managers should do it at Bears Ears too. Zoning will help concentrate visitors and recreation infrastructure in areas where it is most appropriate to protect the monument for future generations.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
F4-4			Please implement a zoned approach to recreation management to help concentrate use and development for recreation where it is most appropriate to protect the monument.	REC01-General, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.
12832-9	Jason Keith 243 Aspen Avenue Moab, UT 84532	American Mountain Guides Association	Moreover, we urge the Agencies and BEC to consider expanding the number of walls that authorized SRP holders may access for guided climbing to realize the benefits noted herein from guide outreach to the public. Authorizing more climbing walls and a larger variety of walls will better serve visitors desired recreation experiences while also educating more BENM visitors regarding the cultural history and sensitivity of BENM. It will also help guides to reduce impacts by allowing them to avoid areas with high concentrations of use.	REC01-General, ALT05-Alternative E, CUL01-General	SRPs and SUPs will be issued as a discretionary action to meet Monument management objectives. The Proposed Plan has management actions towards SRPs under the Recreation Section. In the Proposed Plan, in the Cross-Cultural Education section, there is collaboration with the BEC to provide cultural sensitivity training to SRP holders.
18987-8			This alternative outright acknowledges that it will likely limit the climbing potential of BENM, which is an unbalanced approach. Involving two federal agencies as well as the BEC puts a cumbersome and drawn-out approval process on this type of recreational use. Also, the USFS should only be involved in approval if the route is located on land that they managed which climbing within BENM traditionally is only located on BLM land. It does not make sense to have an additional government agency like USFS approving routes proposed on BLM-managed land and is overly cumbersome.	REC01-General, ALT05-Alternative E, DECI05-Cooperating Agency Relationships	Management of BLM land is reserved to BLM, and management of NFS land is reserved to USDA Forest Service, meaning that decisions regarding climbing route approval would not be held up by a requirement to seek approval from the non-relevant agency. The term "the agencies" is used for convenience, but as there are a handful of known climbing routes on NFS lands, both were referenced.
18238-56	Chaitna Sinha		Management prescriptions for route maintenance and improvement. Id. It is unclear whether these prescriptions are applicable only to motorized routes, or also to non- motorized trails. The third paragraph, which defines improvement mentions routes or trails several times. Id. However, the management prescriptions only mention routes. We propose: The final plan must clarify that improvement applies to both routes and trails.	REC01-General, ALT05-Alternative E, TRAVEL01-General	The Proposed Plan has management actions for non-mechanized and non-motorized routes in the Travel and Transportation Management Section in Chapter 2. In the Travel and Transportation section, maintenance management actions denoted "designated routes", which is for motorized and mechanized route maintenance.
18238-57	Chaitna Sinha		Maintenance: Designated routes could be maintained to meet public health and safety needs and/or to protect BENM objects. Deviations from current route maintenance levels on designated routes, to provide for public health and safety needs and/or to protect BENM objects, would be considered during plan implementation on a case-by-case basis. Id. We propose: Maintenance: Designated routes and trails could be maintained to meet public health and safety needs and/or to protect BENM objects, in consultation with the BEC. Deviations from current route maintenance levels on designated routes and trails, to provide for public health and safety needs and/or to protect BENM objects, will be considered during implementation-level planning or on a case-by-case basis, in accordance with the relevant recreation management zone, agency policy and in consultation with the BEC. [See letter for emphasis]	REC01-General, ALT05-Alternative E, TRAVEL01-General	Such maintenance will be done in accordance with agency policies and under all action alternatives, the agencies would coordinate with BEC and other Tribal Nations on implementation level travel planning (Management Actions By Alternative section in the Travel and Transportation section in Chapter 2). Comment suggests a style change with no substantive change in meaning. No change made.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18238-58	Chaitna Sinha		Improvements: Improvements to routes, including potential reroutes or alternative alignments, to provide for public health and safety needs and/or to protect BENM objects, would be considered during plan implementation on a case-by-case basis, in accordance with agency policy. Id. We propose: Improvements: Improvements to routes and trails, including potential reroutes or alternative alignments, to provide for public health and safety needs and/or to protect BENM objects, will be considered during implementation-level planning or on a case-by-case basis, in accordance with the relevant recreation management zone, agency policy, and in consultation with the BEC. [see letter for emphasis]	REC01-General, ALT05-Alternative E, TRAVEL01-General	This will be addressed under implementation-level planning. Under the Proposed Plan, improvements to routes, including potential reroutes or alternative alignments, to provide for public health and safety needs and/or to protect BENM objects and resources, would be considered during plan implementation on a case- by-case basis, in accordance with agency policy.
18238-59	Chaitna Sinha		No new trails would be developed in riparian areas or 100- year floodplains. Existing trails would be maintained as necessary to protect BENM objects. Id., p. 2-123. The final plan must clarify that the first sentence is applicable only to the development of new non- motorized trails. In addition, the agencies should revise this action to better protect water resources and sensitive soils, clarify that areas identified as suitable for new trails would be made in implementation-level travel planning in consultation with the BEC, and ensure consistency with the management of each recreation zone. We propose: Implementation-level travel planning, in collaboration with the BEC, will not develop new non-motorized trails in sensitive soils, riparian areas, wetlands, 100-year floodplains, perennial springs and seeps, and other water resources. The development of new non-motorized trails must be consistent with the applicable recreation management zone and is prohibited in the Remote Zone. [see letter for emphasis]	REC01-General, ALT05-Alternative E, TRAVEL01-General	The Draft RMP/EIS already stipulates that new trails will not be developed in the Remote Zone, and if a zonal approach to recreation management is used, all trail management will be consistent with the requirements of recreation zones. Implementation-level planning will include planning for specific trails. Also, the Draft RMP/EIS states: "Implementation-level travel planning would not designate non-motorized and non-mechanized trails in sensitive soils in locations where monitoring has shown degradation to these resources, unless necessary to ensure the protection of BENM objects, or unless there are no other feasible alternatives and those trails would be consistent with the protection of BENM objects." This management would apply to Alternatives B through E. See the Travel and Transportation Management section in the Proposed Plan.
18238-62	Chaitna Sinha		Manage new or existing travel routes to protect habitat for culturally and ecologically important species. Prohibit new roads, trails, or other recreation development that might fragment or disturb nesting, fawning, calving habitat; winter range; or habitat necessary for other vulnerable life stages of culturally and ecologically important species. Id. The final plan must clarify this management prescription to better protect wildlife and wildlife habitat and include collaboration with the BEC. We propose: In collaboration with the BEC, manage new and existing travel routes and trails to protect habitat for culturally and ecologically important species. Prohibit the designation and development of new routes, trails, or other recreation development that might fragment or disturb nesting, fawning, calving habitat; winter range; migration routes, and habitat necessary for other vulnerable life stages of culturally and ecologically important species. [see letter for emphasis]	REC01-General, ALT05-Alternative E, TRAVEL01-General	Under all action alternatives, agencies would coordinate with local government and the BEC and other Tribal Nations on implementation-level travel planning (Management Actions By Alternative section in the Travel and Transportation section in Chapter 2). The phrase, "or habitat necessary for other vulnerable life stages of culturally and ecologically important species" encompasses the need to preserve important migration routes.
18657-13	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	On the whole, we find many components of Alternative A reasonably acceptable. However, since the no action alternative is merely a formality included for comparison purposes and is not going to be seriously considered for adoption in this process, we call on the legal and moral requirement for the agencies to add an additional recreation emphasis action alternative that includes most of the actions in Alternative A and additional active management techniques to promote sustainable recreation without closures, as described above.	REC01-General, ALT06-Proposed, NEW	Alternative A is being considered as a possible management plan for the Proposed RMP/EIS. The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
18657-8	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	There are five alternatives provided within the RMP. The Purpose and Need statement for the RMP prompts the public to assume that each of the five alternatives are the ONLY viable alternatives that the planning team may consider for implementation. However, the public has been grossly misled as an essential, viable alternative has been omitted from the RMP. The RMP is lacking inclusion of a true recreation alternative. Given the recent increase in motorized recreation, paired with increase in general outdoor recreation, a new alternative with a comprehensive Recreation Emphasis is essential to adequately address the Purpose and Need identified for the RMP. This alternative would preserve all existing public access, protect all existing mileage of designated OHV routes, reduce user conflict, improve user safety, and reduce the potential for resource damage by dispersing outdoor recreation enthusiasts more broadly across the land and eliminating high-concentration use areas. A Recreation Emphasis alternative would focus on comprehensively defining where current designated OHV routes, designated OHV riding areas, and designated areas for other outdoor recreation exist, and noting those designations as explicit exclusions for public access restrictions or closure. Currently, Alternative A is the closest of all five alternatives presented in the RMP to a Recreation Emphasis alternative. Alternative B is the closest to a Recreation Emphasis action alternative, though even that alternative excessively prioritizes conservation over recreation. However, we call attention to the fact that based on historic precedent and agency preferences, that as with any NEPA proceeding, the no-action alternative (Alternative A) is purely a formality in proposition and is never seriously considered for adoption. It is therefore vital that the agencies consider an action alternative which emphasizes recreation as a positive good and uses active management rather than closures to manage recreation in effective balance with protection of monument objects. We therefore urge the agencies to add and fully analyze a Recreation Emphasis action alternative in the final RMP.	REC01-General, ALT06-Proposed, NEW	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. The Purpose and Need Section in Chapter 1 of the RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape." Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized access were considered but not analyzed in detail. See Alternatives Considered but Not Analyzed in Detail. The Purpose and Need of the RMP/EIS contains the following language: "Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects...Public land uses within BENM, such as livestock grazing and recreation, are important to the economic opportunities and quality of life of the local communities surrounding BENM. Although these two uses are not identified in Presidential Proclamation 10285 as objects, these are discussed as important land uses in the area. Planning decisions should consider how to protect Monument objects with consideration of other uses of the landscape." Recreation is acknowledged as an important use within the Monument, however, it is specifically excluded from consideration as a BENM object in Proclamation 10285. Alternatives aimed at increasing motorized

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					access were considered but not analyzed in detail. See the Alternatives Considered but Not Analyzed in Detail section in Chapter 2.
13862-3	Matthew Riccardi		Authorization for New Routes: Climbers support programmatic authorization for establishing new routes that require anchors. This will facilitate the responsible development of climbing infrastructure while preserving the monument's integrity.	REC01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
14701-2	Lucas Barth		Please do not require ISRP's for climbing. This is overly cumbersome and burdensome to the climber user group.	REC01-General, ALT07-Modification of Existing Alternatives	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
15439-11	Jason Keith Moab, UT 84532	Access Fund	The Climbing Organizations request much more information regarding the purpose and (measurable) need for a permit system, and how permits would be administered, implemented, and enforced. Will this system be developed through a RAMP, Tribal management zone plan, or some other initiative? Implementation of such a broad permit system, while potentially providing many management and educational benefits, will also be very difficult and costly to administer and enforce. Also, under Alternative E, if necessary, the Agencies would require permits (e.g., ISRPs or RUPs) or fees, implement area closures, or place limitations on the number of users and duration of use. Commercial and private use allocations would be adaptive to ensure protection of BENM objects. The BLM should clarify what if necessary means that would trigger fees. The Climbing Organizations question whether an Individual Special Recreation Permit (ISRP) should be required for all climbing activities as required under Alternative C. While we understand the need to educate climbers as to monument objects and sensitive resources, this draft RMP considers may other effective ways to educate the recreation community, and it is unnecessary to manage climbing restrictions via permit (Alternative C) as current management practices as well as climber self-regulation for climbing area restrictions for example to protect cliff nesting raptors have proven largely effective at many climbing areas across the country. The Climbing Organizations recommend that the Agencies implement no permit fees or quotas initially, and then consider additional actions as necessary through data collection and adaptive management. Any future BENM permit system should evolve based on outcomes from low-burden permit implementation.	REC01-General, ALT07-Modification of Existing Alternatives	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Permit systems are one tool that may be used to communicate with the public, the agencies will continue to educate members of the public through alternative communications (signage, in personals interactions, partnerships).
15439-12	Jason Keith Moab, UT 84532	Access Fund	The Climbing Organizations have received many questions about what these rest periods mean for public access to BENM, asking about what areas would be affected and during which seasons, and whether such rest periods relate to existing access restrictions already in place such as seasonal climbing closures to protect cliff-nesting birds. The BLM should address the scope of these proposed rest periods and clarify if they would affect substantial portions of BENM. The draft RMP is vague in its references to this potentially very consequential issue. For example, Alternative B states that developed recreation facilities may be closed seasonally to allow for resource rest and/or traditional uses or ceremonies. These seasonal closures would be identified in collaboration with the BEC and Tribal Nations. Protocols under Alternative B for recreation are similar to those under Alternative A, with the exception that trails could be closed seasonally to allow for resource rest and/or traditional uses, determined in coordination with the BEC and Tribal Nations. Alternative B would allow for the addition of new climbing bolts, anchors, or fixed gear in the Indian Creek SRMA with prior approval from the BLM. It also provides for seasonal closures of climbing routes to protect nesting raptors, to provide natural resource rest, and/or to support traditional uses. Alternative C states that recreation facilities may be closed seasonally to allow for resource rest and/or traditional uses or ceremonies. These seasonal closures would be identified in collaboration with the BEC and Tribal Nations and, where applicable, managed through permit systems. Alternative E would allow for the most extensive seasonal restrictions to allow for resource rest. Under Alternative E the RMP describes that Traditional Indigenous Knowledge provides that the cultural landscape of the Monument requires rest during certain seasons of the year. Alternative E specifies that Seasonal closures of [recreational] facilities would be considered to allow for resource rest and/or traditional uses or ceremonies. These seasonal closures would be identified in collaboration with the BEC and Tribal Nations. The concept of resource rest is a new approach to land use management and requires much more discussion in this draft RMP. In some cases the use of the term seems to apply to conventional management actions like climbing route seasonal closures to provide natural resource rest, whereas other applications of this term for management purposes are much more vague. BLM should provide much more clarity regarding what these natural resource rest periods mean: where are they, when do they occur, how will they be established, what activities will be affected, and what is their need/purpose. This new management planning concept may be an appropriate way to manage BENM, but it is highly consequential and remains vague and undefined throughout the draft RMP.	REC01-General, ALT07-Modification of Existing Alternatives	Resource rest could include the raptor nesting closures referred to in the comment, as well as rest that occurs during the winter and summer. Resource rest would be implemented in collaboration with the BEC. Various options for resource rest and closures would be analyzed as a part of implementation level planning.
15439-13	Jason Keith Moab, UT 84532	Access Fund	Under Tribal Alternative E the Agencies would change their conventions for management zone planning. Instead of utilizing, for example, Special Recreation Management Areas (SRMAs) and Extensive Recreation Management Areas (ERMAs) and Recreation Management Zones (RMZs), the Agencies would implement landscape-level management zones to manage visitation and other recreation uses in a manner that would protect BENM objects. Accordingly, although the RMP would	REC01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			designate no areas specifically for recreation-focused management (a concept the Climbing Organizations and others have fought hard for!), this new management planning structure could nonetheless work well with recreation needs and priorities. As noted above, the Climbing Organizations believe the Agencies should consider some form of subzoning for these landscape level management zones that will greatly assist with more specific planning and management. Alternative E retains a specific recreation management area for the San Juan River (Same as Alternative B for the San Juan River SRMA) but does away with all other SRMAs and designations that could provide boundaries for tailored planning and management. At the least the Indian Creek SRMA should be retained to provide an effective boundary for a future RAMP contemplated under any potential alternative, but we also believe many other areas throughout the monument would benefit from subzones with boundaries for targeted planning, including locations important to climbing such as Valley of the Gods, Lockhart Basin, Harts Draw, and Arch Canyon, among others. The Climbing Organizations look forward to working with the BLM, USFS, BEC and others on integrating this new approach into BENM planning.		Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details).
15439-14	Jason Keith Moab, UT 84532	Access Fund	The Outback Zone (where much of BENM climbing occurs), is substantially larger than either the Front Country Zone and the Passage Zone, would contain a natural and undeveloped recreation setting providing only trailheads, minimal informational infrastructure, existing developed campgrounds, and dispersed camping opportunities. The Outback Zone, like the Remote Zone, would rely on off-site interpretive materials unless needed to protect BENM objects. No new recreational sites or facilities would be developed in the Outback Zone. Minor facilities such as trails, trailhead markers, and informational kiosks would only be allowed in existing recreation sites and only when necessary to protect BENM objects. The Remote Zone, by far the largest recreation zone, would provide a natural, undeveloped, and self-directed experience for visitors while limiting motorized or mechanized access, benefiting visitors who seek a more remote experience by preserving the natural characteristics of a large area of BENM. No new facilities, sites, or trails would be allowed in Remote Zones, which, according to the draft RMP, could be to the detriment of visitors seeking a more developed experience; however, existing trails could be designated if consistent with the protection of BENMs objects, which could benefit users by providing more recreational opportunities. Significantly, management plans would be developed for all zones, including recreation and interpretation plans, in order to protect BENM objects, yet the Agencies provide few timelines for when these plans would be developed, what the specific scope would be for these plans, and what specific landscapes and zones would be considered. Also, several questions emerge from the standards and qualities described in the draft RMP for these zones. Perhaps most prominently is the restriction on new recreational sites or facilities developed in both the Outback and Remote zones which could significantly limit the ability of the Agencies to manage for recreational visitor and use patterns in the future that may not be evident today. These restrictions are even more significant given that Alternative Es Visual Resource Management Class I management objectives which should preserve the existing character of the landscape overlap very closely with the Remote (and Outback) Zones. Under VRM I the level of change should be very low and must not attract attention, creating a management structure with a very high bar for any new infrastructure, sites, trails, or toilets which could protect BENM objects more than a standard limiting all future recreation infrastructure or mitigation efforts. The Climbing Organizations support high protection standards that allow very little change to BENMs undeveloped character. However, this draft RMP should consider what options may be appropriate for adaptive management actions that may allow limited trails, signs even camouflaged toilets and other minimal infrastructure that may in the long run do more to protect monument objects than a complete prohibition on new facilities, sites, or trails.	REC01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenters concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. The Remote Zone has been redrawn to better align to highly protected areas such as WSAs, LWC protected for those characteristics, and WSR. The allowable uses within Remote and Outback Zones have been clarified to allow for some infrastructure in the Outback Zone to allow for the kinds of resource protection referred to in the comment.
15439-17	Jason Keith Moab, UT 84532	Access Fund	Human and Other Waste, Campfires Ensuring appropriate human waste management for climbers has been a longstanding project for the Climbing Organizations. Following a temporary wag bag program, significant investments have been made for the construction and management of toilets throughout the Indian Creek corridor. This RMP should consider any additional human waste management needs given current and projected use levels and patterns. The Climbing Organizations support provisions in the draft RMP whereby visitors are required to use existing bathroom facilities or pack out solid human waste for disposal at an appropriate facility. All cans, trash, organic garbage, and burnable refuse, including toilet paper, must be carried out; liquid garbage may be discarded 200 feet from any water source; and dishwater must be strained and discarded 200 feet from any camps, trails, and water sources. The Climbing Organizations support new policies that restrict campfires to fire rings where metal fire rings are available, or in dispersed camping areas with no metal fire rings, limiting campfires to fire pans with the requirement that visitors haul away campfire ash. Stone fire rings should not be allowed unless consistent with the preservation, restoration, and protection of BENM objects as determined during implementation-level planning, and campers must bring in their own wood for campfires.	REC01-General, ALT07-Modification of Existing Alternatives	These comments are consistent with the Proposed Plan.
15439-3	Jason Keith Moab, UT 84532	Access Fund	Highly significant to the preferred Tribal Alternative E, is the proposal to create management area zones to address recreation and visitor use instead of conventional BLM and USFS planning and management designations. Accordingly, the Agencies would not use the typical recreation planning areas and instead develop Front Country, Passage, Outback, and Remote Zones each that would	REC01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			receive management plans, including recreation and interpretation plans, in order to protect BENM objects. This change in management planning protocol may be effective and appropriate for both cultural resource protection and recreation management, but many significant details will not be identified and addressed until these later plans are developed and implemented. An important modification to Alternative E that the Agencies should consider is the retention of recreation management subzones that clearly subdivide discrete landscape areas to better plan and manage for the many distinct locations found within each of the larger complex management area zones. Evidently, this proposed management zone convention may have been modeled off the 2000 Monument Management Plan for Grand Staircase-Escalante National Monument (GSENM) which utilized Frontcountry, Passage, Outback and Primitive landscape zones; nonetheless that plan retained at least seven Special Recreation Management Zones and the currently proposed 2023-24 GSENM Monument Plan proposes to retain at least 14 recreation management designations. We believe that broad landscape zones without clearly demarcated subzones would hinder the Agencies ability to bring tailored planning and effective management for BENMs many special places.		Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details).
15439-6	Jason Keith Moab, UT 84532	Access Fund	We urge the BLM to develop an Indian Creek visitor use plan through the implementation of Alternative E that may complement management plans envisioned for the Front Country, Outback, and Remote Zones. We look forward to developingin collaboration with the BEC prior authorization processes for new climbing routes that require the placement of bolts, anchors or fixed gear as required under all alternatives.	REC01-General, ALT07-Modification of Existing Alternatives	Within the Proposed Plan, implementation level planning would include the designation of a Management Area for Indian Creek.
15724-7	Rob Dillon 84532		Seasonal closures as per Alternative B have their place, perhaps, but the desert defends itself through two unfriendly seasons already. My request is that they rotate through locations, rather than include the entire landscape. Not much grows in the dead of winter, and not many people come to freeze through the long nights- maybe leave a few sunny places open	REC01-General, ALT07-Modification of Existing Alternatives	Seasonal closures would be determined in coordination with Tribal Nations and the BEC and would be applied to specific areas of BENM. All closures would follow agency policy for emergency or long-term closures, which typically involves a public process for non-emergency closures.
17263-2	Chris Schulte		Do not create a review or permitting process for new routes, climbers have largely policed themselves historically to great effect and with very few exceptions.	REC01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
17617-12	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	Develop biking routes on existing designated route or with designated trails o Biking has become an important recreational sport on many of the federal lands north of BENM. There are not many places where it is currently allowed - or even appropriate - in BENM. Places like Lockhart Basin aﬀord beautiful, scenic opportunities for mountain biking along designated routes whereas slickrock biking in places like Comb Ridge can be detrimental to cultural and natural resources. Better signage for where bicycles are and are not allowed can promote a culture of responsible bike riders. o BEP suggests that land managers maintain bike access on existing designated routes. Electrical-assist (e-assist) bikes and bike packing are growing recreation trends, and both have the potential to increase the distance and footprint of biking in the monument. The impacts of these activities should be carefully analyzed and considered.	REC01-General, ALT07-Modification of Existing Alternatives	Mechanized travel would be allowed on all designated OHV routes and on trails specifically designated for mechanized use under the Proposed Plan. E-bikes would be considered during travel management planning under agency guidance.
17969-16	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Recreation and Visitor Services Among various resource uses in the BENM, the greatest potential for current and future adverse impacts to resources is increased visitation. The Draft RMP/EIS lists archeological, historical, cultural, geological, paleontological, biological, and ecological objects and values within the BENM. These are all at risk of degradation because of increased visitor use if BENM lands are not managed carefully, receive proper funding, and actions are taken now to address increased pressures on resources. Therefore, the Proposed RMP/Final EIS should ensure the protection of the objects and values within BENM in the face of rapidly increasing visitation and associated eﬀects. TNC generally supports Alternative E or the zoned approach that maximizes the consideration and use of Tribal perspectives, incorporates western science, and emphasizes resource protection. To further protect BENM objects and resources, TNC recommends: development of facilities should be allowed only in the Front Country zone; the Remote Zone should include all of the north end of Shay Mesa and its canyon walls also known as the Sundial, the BLM land from Titus Canyon north that lays between Indian Creek and North Cottonwood, and all of the east bench of Lavender Canyon (aka west Bridger Jack bench) and allowing for a future permit system for sites in designated campgrounds. If any activity level plan is done for BENM, TNC recommends that: camping be allowed only in sites in designated campgrounds. for all of Indian Creek, North Cottonwood, Lavender Canyon, East Bench of Lavender Canyon, Davis Canyon, Corral Pocket, and areas between Hamburger Rock area west to Needles District NPS boundary; designated campgrounds should be limited to those in existence at this time (e.g. Super Bowl, Hamburger Rock, Bridger Jack, and Creek Pasture; climbing should only be allowed on designated routes and climbing routes that impact nesting raptors or cultural resources should be eliminated; Bridger Jack Campground should retain its backcountry primitive quality and visitors should be required to pack out human waste rather than develop bathrooms; and education should be used as a broad tool to manage better recreation.	REC01-General, ALT07-Modification of Existing Alternatives	The zones were redrawn to more closely match existing and desired conditions, and allowable uses and management actions within the zones were redefined for clarity. Some amount of recreational development would be allowed in the Passage and Outback zones as well as the Front Country Zone, but allowable facilities in the Outback Zone are generally smaller and more limited (i.e., trailheads would be allowed, but campgrounds would not), and will have a specific focus of protecting resources in the Outback and Remote Zone. Specific developments would be considered through implementation-level RAMPs, which would include public involvement.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18082-43	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	All the alternatives in the Draft EIS propose to manage recreation by the direction found in Appendix E, Supporting Information for Recreation and Visitor Services Decisions. We support the establishment of special recreation management areas (SRMA); however, we could not locate an analysis of the recreational carrying capacity ¹⁵ in BENM nor thresholds for recreation use to specifically protect Monument ROVs. The Interagency Visitor Use Management Councils website provides a visitor use framework for federal lands that contains information on how to establish a carry capacity and measures to manage recreational use. ¹⁶ Using this framework, we recommend the BLM establish a carrying capacity for each SRMA and thresholds in the RMP that specifically address the protection of Monument ROVs. Based on the established carrying capacities, we recommend determining in the Final EIS whether changes to recreational use management are needed to protect Monument ROVs. We also recommend the Final EIS include: A monitoring plan that manages recreational use from the perspective of protection of Monument ROVs. Triggers and timeframes for corrective action. A commitment to close and rehabilitate areas of the Monument where ROVs are threatened or damaged. A commitment to improve signage to educate and inform the public on recreational BMPs and trail/road designations and closures.	REC01-General, ALT07-Modification of Existing Alternatives	Any carrying capacities would be determined as necessary through implementation-level planning. Details regarding enforcement of the RMP, as well as rehabilitation planning and the development of educational resources, would also be addressed further under implementation level planning. Please see Appendix P for monitoring framework, timeframes, indicators, metrics, and triggers. Further monitoring information can be found in Appendix E (Recreation). The Travel and Transportation Management section states: "The system of roads and trails would be well marked to protect BENM objects, promote safety, and minimize conflict among various user groups while accommodating appropriate access." for all alternatives, including the Proposed Plan.
18275-10	Jamie Ervin	Outdoor Alliance	We recommend that the BLM adopt Alternative B language as it pertains to future bicycle access: Mechanized travel (e.g., bicycles) would be limited to routes where OHV use is allowed and to trails specifically designated for mechanized use. Bicycle access is an important, sustainable, and enjoyable means of experiencing the BENM landscape and protected objects, specifically recognized in proclamation language. Front Country, Passage, and Outback Zones are all appropriate areas for bike trail access in a variety of settings, and we encourage BLM to provide opportunities for bicycle access. We also encourage BLM to more explicitly address access for e-bikes in the Final RMP in a way that allows land managers to distinguish between e-bikes, OHVs, and traditional bicycles. In some instances, it may be appropriate to allow e-bikes to access closed OHV roads where their use does not degrade BENM objects or other non-motorized recreation opportunities. We ask that the final RMP more clearly distinguish between motorized and mechanized use by adopting language from Alternative B and allow land managers flexibility to preserve access and a quality experience for bikes on trails and roads that are closed to motorized users. As currently written, Alternative E considers motorized and mechanized uses together in most cases, which could lead to certain trails being closed to bikes when a trail may be capable of supporting mechanized travel without impacting BENM objects.	REC01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan adopts the language from Alternative B as suggested. Please refer to Management and Use of Electric Bikes on BLM-managed Lands IM 2023-051.
18275-4	Jamie Ervin	Outdoor Alliance	Oftentimes some level of infrastructure (e.g., bathrooms, signage, maps, trail hardening, etc.) can help reduce impacts from recreation. Particularly given the emphasis on closures in other areas of the plan (see above), we recommend providing increased flexibility for land managers to conduct restoration and rehabilitation projects in the Remote Zone and Outback Zones.	REC01-General, ALT07-Modification of Existing Alternatives	The Remote Zone has been redrawn to better align to highly protected areas such as WSAs, LWC protected for those characteristics, and WSR. The allowable uses within Remote and Outback Zones have been clarified to allow for some infrastructure in the Outback Zone to allow for the kinds of resource protection referred to in the comment.
18548-1	Melanie		Consider requiring firepans only near cultural sites to preserve them instead of 100% usage of in all of monument.	REC01-General, ALT07-Modification of Existing Alternatives	The Draft RMP/EIS considers a range of management for campfires with varying requirements for the use of fire pans.
18657-11	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Overall, alternative A is fairly reasonable, and we urge the agencies to incorporate as many actions from it into other alternatives as possible. By and large, BENM is already effectively managed, with only minor adjustments needed to handle the increased visitation that comes with national monument status. Much of the monument is managed under the two management plans developed only four years ago for the two monument units created under the Trump administration. These management plans struck an effective and functional balance between protecting monument objects and maximizing recreational opportunities and other multiple uses that are compatible with the monument.	REC01-General, ALT07-Modification of Existing Alternatives	Thank you for your comment. Alternative A is within the range of alternatives.
18680-1	Ken Fitch		The designation of zones may facilitate a more manageable approach, although the definition of recreation becomes important, and indeed there have been issues with active (and perhaps extreme) recreation in some areas, so there may be some need for specific management directives within those zones. Some recreation may not be appropriate in the areas of sacred sites. It will be extremely important early in the implemental process to define with tribal advice and directive where such recreation and what kind should exist. The announcement of the National Monument designation, along with the Post-COVID trending imperative for outdoor recreation, especially extreme sports, has resulted in wilderness trekking and an increase in rock climbing. One is most concerned about certain locations that are sacred and should be off limits so that we do not have a situation like Devils Tower National Monument. where the popular climbing is considered a sacrilege. Similarly, areas with rock art must be avoided to prevent situations like at Joshua Tree National Park, where rock art has been damaged by climbers. The clarity of locations for recreation is of critical importance so that visitors will know clearly where such activity is permissible and where it is inappropriate and forbidden. Rivers have become important corridors for recreational use, but boating and river navigation also brings access to remote areas and important fragile sites. Canyonlands National Park has seen many such situations where damage to sites has occurred, often unintentional, as recreational visitors see evocative canyon sites as cool places to explore.	REC01-General, ALT07-Modification of Existing Alternatives	Under all alternatives, the agencies will work with BEC to "manage recreation use in a manner that supports and respects Tribal Nations traditional uses, values, and perspectives, where practicable." (Management Actions by Alternative).

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18687-2	Britt Zale 2093 Nighthawk Lane Moab, UT 84532		How might permits and fees work for climbing activities? Will this mostly impact locals as we are the ones taking regular last minute day trips to climb and/or camp? Will there be an entry station with long lines to access the areas, making it impossible to do a shorter day trip? I'm pretty concerned that I shaped my life to be near a place that will now be difficult to access without getting lost in government permitting, fees, and lines of tourists.	REC01-General, ALT07-Modification of Existing Alternatives	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
18687-3	Britt Zale 2093 Nighthawk Lane Moab, UT 84532		What will the process be for creating new climbing routes? Will there really be staff available to review applications or some automatic computerized authorization? As many climbing walls in Indian Creek are closed for Raptors in the spring, climbers need to disperse more along the open walls and we can't do that without installing new anchors on new routes.	REC01-General, ALT07-Modification of Existing Alternatives	A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
18696-6	Julian Soncco		Remove current federal guidelines for recreation specific area permitting and empower the zoned approach as suggested by Alternative E as most forms of recreation are inappropriate in sacred spaces.	REC01-General, ALT07-Modification of Existing Alternatives	BENM is managed under FLPMA and also under additional BLM policy, where consistent with protection of Monument object and the governing Proclamation. Proclamation 10285 clearly identifies recreation as a use within the Monument that contributes to both the experience of visitors and local economies. As such, the BLM Recreation Planning Framework, which is applicable within Monuments as per both BLM Monument and BLM Recreation policy, is applicable within BENM. The Proposed Plan employs a zoned approach to recreation management. The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details).
18990-14	Clif Koontz		The DRMP/EIS preferred alternative would make over three-quarters of the monument a Remote RMZ, which includes strict policies such as "New mechanized trails would not be allowed in the Remote Zone." We're concerned that this arrangement would hobble effective OHV management in much of the acreage that's spared from non-motorized ROS and OHV Closed zoning. Therefore RMZ acreage and policy should be scaled back so that they assist the Lead Agencies to manage recreation rather than effectively expanding the ROS and OHV Area restrictions that are already proposed to be severe.	REC01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects.
3123-7	Russell Bodnar 5A Road 2976 Aztec, 87410Tracy Bodnar		Provide portable toilets in the heavily used Comb Ridge areas to reduced the impacts of human waste in popular areas. A large obtrusive visitor would negatively impact the ambiance of the monument.	REC01-General, ALT07-Modification of Existing Alternatives	The Bears Ears Partnership currently supplies the toilets in the Comb Ridge Area/Butler Wash Road, but under a future implementation level RAMP, permanent toilets for specific areas in Comb Ridge may be considered (See Appendix E, Recreation). The Proposed Plan states that major developments such as visitor centers would be developed on the periphery of BENM or near local communities (Recreation and Visitor Services section in Chapter 2), consistent with the guidance in BLM Manual 6220 - National Monuments, National Conservation Areas, and Similar Designations 1.6.F.2 regarding development of new visitors centers.
3125-13	Steve Knox		Page 2-81 and 2-82, 2.4.20, Recreation and Visitor Services, Table 2-19, Alternative E, Outback Zone, 1st bullet This action states BENM objects, TCPs, Wilderness, WSAs, and LWC would be avoided whenever possible. This action is unclear. Do you mean to minimize or avoid these places for recreation use, or for the distribution of interpretive materials? Please clarify. This doesnt sound consistent with the objective for management of recreation use in the Outback Zone a self-directed visitor experience.	REC01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. Although the Remote Zone has been redrawn under the Proposed Plan to more closely align with highly protected areas, portions of those areas may be included in another zone when they are directly adjacent to highway corridors or other heavily-used locations where additional management may be needed. For example, although the majority of the Valley of the Gods ACEC is within the Remote Zone, the Valley of the Gods Road itself is within the Passage zone to allow for continued use and maintained of the road and also management actions to prevent impacts caused by recreational use.
614-1	Larry Ellertson		I think there could be a way found either through – when I say "scheduling", I don't mean a hard, fast schedule but through some type of seasonal use or weekly on, weekly off use so that one group can use it here and the other one can use it here.	REC01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, Arch Canyon would remain open to motorized use, however a permit system would be implemented to allow the agencies more flexibility to protect Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future. A system as described by the comment would be considered in implementation level planning (either a RAMP or TMP).
661-1		Moab Climbers United	The blanket statement component stating all new bolting should require a permit is addressing a 'non-issue'. In your analysis, you failed to mention how this is an issue and it's affect on resources. Also, you failed to provide a range of alternatives regarding bolting new routes. There is a subset of rock climbers that climb new routes that require placing two painted bolts hundreds of feet off the ground where nobody can see them and where it doesn't disturb cultural sites. It's blatantly clear that you need to rework this EIS by 1) define the issue with bolting 2) If there is an issue, provide an affects analysis 3) Provide range of reasonable alternatives.	REC01-General, ALT07-Modification of Existing Alternatives	The draft plan and EIS contained alternatives ranging from approval in specific parts of the Monument, approval across the Monument and no approval. The EIS includes analysis surround impacts to Monument objects from visitation, recreation and is Proposed Plan to address conflicts.
8305-14	Tracy Bodnar		Limit group size to reduce impacts to the popular and more easily accessed cultural and natural resources. Remove old fire rings and install signs to inform campers of ban on fires. Provide portable toilets in the heavily used Comb Ridge areas to reduced the impacts of human waste in popular areas.	REC01-General, ALT07-Modification of Existing Alternatives	Impacts Under the Proposed Plan includes group size thresholds by zone, which are most restrictive in the Remote and Outback Zones. The Bears Ears Partnership currently supplies the toilets in the Comb Ridge Area/Butler Wash Road, but under a future implementation level RAMP, permanent toilets for specific areas in Comb Ridge may be considered (See Appendix E, Recreation).

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8305-16	Tracy Bodnar		A large obtrusive visitor would negatively impact the ambiance of the monument. The Kane Gulch Ranger Station should be improved with daily staffing and phone service, in order to provide hikers with current information on springs, trails, and road conditions when they are at home planning and when they arrive in the area. Other information could be found at Natural Bridges NM, perhaps with addition funded staffing for monument personnel.	REC01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan states that major developments such as visitor centers would be developed on the periphery of BENM or near local communities (Environmental Consequences), consistent with the guidance in BLM Manual 6220 - National Monuments, National Conservation Areas, and Similar Designations 1.6.F.2 regarding development of new visitors centers. The Kane Gulch Ranger Station is specifically noted as being a focus of efforts to develop, maintain, or improve recreation sites under Alternatives A, B, C, and E (Management Actions by Alternative in the Recreation and Visitor Services section in Chapter 2 of the Draft RMP/EIS).
889-70	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We have strong concerns with any references to the concept of user conflict in the Monument Management Plan or EIS, and any plan components motivated by this concern. This term is extremely vague and has been used many times in past management decisions by the Forest Service and the BLM to include simple ideological opposition to motorized recreation by anti-motorized activists. This in turn categorically delegitimizes motorized recreation as a valid activity on public lands, in direct contradiction to the express language of the Travel Management Rule. We believe that all references to user conflict in the Management Plan or EIS (including any analysis of alleged user conflicts in Arch Canyon, discussed above) should be clarified to only refer to demonstrable cases of interpersonal conflict, and should not refer to social values or ideological conflict.	REC01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan, and later implementation-level travel management planning, does and will consider the body of research on recreation conflict, including review by the Congressional Research Service, which documents interpretation of the interchangeability of "use" and "user" related to this topic as grounded in BLM policy handbooks 1221-2, 2930-1 and 8320-1, through rulemaking in 67 FR 61732, and documented in other associated guidance. The agency has the authority to manage recreational uses through implementation level travel management planning following the process outlined in BLM H-8342 Travel and Transportation Handbook. The handbook states: "Areas, roads, and/or trails are designated closed if closure to all OHV use is necessary to protect resources, promote visitor safety or reduce user conflicts." Motorized routes will be designated under travel management planning, which will be an implementation-level effort. OHV closed area designations are not made out of a preference for one kind of recreation over another, but rather to provide adequate protections to Monument objects, special designation areas, and other resources. Under the Proposed Plan, motorized use would be allowed in Arch Canyon under a permit system. The permit system would be developed as part of the BENM Travel Management Plan in the future.
889-73	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	For these reasons, we are highly suspicious of any language in the proposed management plan that would require future management decisions to consider closing motorized routes based on user conflicts, or any outright closures included in the plan (such as Arch Canyon) motivated by concerns of user conflict. While we would prefer for such language not to be included in the first place, if it is, we ask that clarifying language be added to explain that this term includes only documented cases of interpersonal conflict and not ideological or social values conflicts. As described in more detail above, we also oppose any closure of existing motorized routes by placing them in non-motorized ROS zones or other incompatible management areas. Such action would inherently favor non-motorized recreation over motorized recreation, thus denying the legitimacy of motorized recreation as an activity.	REC01-General, ALT07-Modification of Existing Alternatives	The agency has the authority to manage recreational uses through implementation level travel management planning following the process outlined in BLM H-8342 Travel and Transportation Handbook. The handbook states: "Areas, roads, and/or trails are designated closed if closure to all OHV use is necessary to protect resources, promote visitor safety or reduce user conflicts." Motorized routes will be designated under travel management planning, which will be an implementation-level effort. OHV closed area designations are not made out of a preference for one kind of recreation over another, but rather to provide adequate protections to Monument objects, special designation areas, and other resources. Under the Proposed Plan, motorized use would be allowed in Arch Canyon under a permit system. The permit system would be developed as part of the BENM Travel Management Plan in the future.
15439-10	Jason Keith Moab, UT 84532	Access Fund	Alternative E states that within 1 year of the issuance of the record of decision, the agencies, working collaboratively with the BEC, would develop a tribal interpretation plan for recreational visitors. The work to prepare the interpretive plan and the trail system would inform both efforts. We ask the BLM to provide more clarity regarding this Tribal interpretation plan for recreational visitors, such as whether this plan will focus on the entire monument and what recreation activities will be considered (i.e., hiking trail, climbing access trails, mountain bike trails). Again, we are very interested in collaborating on this trail planning initiative and request more process details from the BLM, especially with regard to planning timelines and the boundaries/zones of areas to be considered and prioritized.	REC01-General, ALT07-Modification of Existing Alternatives, DECIO5-Cooperating Agency Relationships	The agencies will have a public engagement process related to implementation-level interpretative planning for Bears Ears National Monument. This Interpretation Plan would be completed under implementation-level planning and more detail will be provided at that time.
8999-19		International Mountain Bicycling Association	While outdoor recreation resources do not qualify as protected objects within the context of the Antiquities Act, recreational activities are often the means by which visitors experience and appreciate protected objects. Both proclamations make clear that providing sustainable recreation access where it does not unduly harm protected objects is in line with the intent of BENMs designation as a national monument. The NOI also claims that recreation and livestock grazing are the primary uses of the BENM	REC01-General, ALT07-Modification of Existing Alternatives, DECIO7-Compliance with other laws and policies	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
18965-16	Simone Griffin	BlueRibbon Coalition	OHV opportunities in Southern Utah are becoming few and far between. Alternatives need to recognize the recreational value that these opportunities bring and the BLM/USFS needs to manage for multiple use and not restrict these opportunities further. We are concerned that many roads and areas with historical use and significance are being considered for closure through the creation of backcountry areas such as Hole in the Rock trail and Arch Canyon. Other roads that are iconic and crucial to the makeup of the local cultures and economies are, Chicken Corners Jeep Safari Trail, numerous spur routes off Lockhart Basin Road, all of the roads in the Imperial Valley area of Beef Basin including critical connecting routes that provide the sole access to designated motorized routes inside the Glen Canyon National Recreation Area, Moqui Canyon, Mikes Canyon, Lavender Mesa, and Arch Canyon as previously mentioned. These areas have a history of use and a vital purpose and need. Current trends show an increase in outdoor recreation the past few years that isnt looking to slow down. With more users on public lands, decommissioning and closing routes from creating more roadless areas, areas of environmental concern or wilderness characteristic areas would be irresponsible as this would concentrate more users into a smaller space which would increase the	REC01-General, ALT07-Modification of Existing Alternatives, TRAVEL01-General	Under the Proposed Plan, Arch Canyon and many of the roads mentioned by the commenter would be managed as OHV limited. All travel management planning regarding the designation and possible construction of new routes will be done in compliance with agency policies. See the Recreation Use and Visitor Services section in Chapter 3 for discussion of impacts on recreational opportunities from OHV area designations. See Proposed Plan under Travel Management Section for OHV management.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			potential for injury and impact. Wilderness areas have already been studied and established. Closures should not be seen as legitimate almost hardwired responses to issues that can all be managed through other management strategies. BLM/USFS should acknowledge that the Categorical Exclusions that apply for construction of new roads and trails should be applicable to these classes. In many cases these exclusions are for rerouting existing routes because of erosion events, or creating roads to do vegetation treatments that reduce the risk of catastrophic fire.		
18990-13	Clif Koontz		The Manti-La Sal National Forest portion of BENM provides valuable opportunities for snowmobiling and other over-snow vehicle (OSV) use, which is appropriate compatible with resource conservation. Other than when reciting the current LMP for this national forest, the DRMP/EIS doesn't seem to address OSV use whatsoever, yet the action alternatives seem to restrict is severely. The DRMP/EIS states that the following definitions for OHV area designations: "Limited: Designated areas where motorized vehicles are restricted to existing and designated routes. Off- road, cross-country travel is prohibited in limited areas, unless an area is specifically identified as an area where cross-country, over-snow travel is allowed. Some existing routes may be closed in limited areas. Closed: Designated areas where off-road motorized vehicle travel is prohibited year-round. Emergency use of vehicles is allowed year-round." These definitions suggest that OSV use would be prohibited in areas zoned as OHV closed, which the DRMP/EIS proposes to expand dramatically to cover most of the high-elevation terrain where OSV use is possible. So conserving wintertime motorized recreation is yet another reason to simply keep the OHV area designations in place, as winter ROS zones could be added to carefully restrict OSV use in a portion of the OHV Limited areas, but ROS zones could not be added to carefully allow OSC use in a portion of the OHV Closed areas.	REC01-General, ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The Proposed Plan would not change the current OSV opportunities on NFS lands within BENM. Route and area designations for OSV use will be occur in implementation level travel planning.
8999-15		International Mountain Bicycling Association	The BENM could join other BLM eMTB trails which are providing continued and new outdoor recreation opportunities for Americans. E-bikes are getting people out of sedentary automobiles and onto bicycles allowing them much needed physical activity to experience natural wonders of public lands around the country. E-bikes and specifically electric mountain bikes (eMTBs) are a vastly growing segment in the bike industry.	REC01-General, ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Please refer to Management and Use of Electric Bikes on BLM-managed Lands IM 2023-051.
8999-18		International Mountain Bicycling Association	Again, the BENM is host to only 3 miles of designated mechanized travel routes. While remote roads in the BENM provide access for mountain bikers to lesser traveled areas of the BENM landscape, which can provides a remote, undeveloped recreation experience in contrast with the more-developed recreation infrastructure at nearby national parks, those trails are often poor experiences when shared with OHV traffic. Overall, the designated mountain biking opportunities in the BENM is woefully inadequate.	REC01-General, ALTO7-Modification of Existing Alternatives, TRAVEL01-General	The designation of specific trails for mountain biking use is outside the purview of the RMP/EIS process. The BLM and USDA Forest Service will develop implementation-level travel management plans that will assess existing motorized/mechanized trails and routes, as well as future needs and opportunities.
8999-21		International Mountain Bicycling Association	There are so few current designated trails for bikes in the monument therefore access for bikes and bicycle tourists is effectively limited to the shared use of vehicular roads which will not meet this need. The DRMP acknowledges this but fails to establish the guidance, direction, and potential allocations that could help foster the development of a system of existing or future routes in subsequent travel management plans and fails to create the vision and direction for future trail access. This is also a failure to address the purpose and need that has been articulated above.	REC01-General, ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Proclamation 10285 specifically excludes recreation as a Monument object to be protected, while still acknowledging the world class outdoor recreation opportunities, including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. It also notes the importance of these recreational activities on the regional economy. The agencies developed alternatives that would provide for appropriate recreational opportunities while protecting BENM objects.
9255-4	Keith Alleman		page ES-8. paragraph on Alternative C Alternative C under travel and transportation management says management of nonmotorized and nonmechanized trails would be the same as under Alternative B. But in the like bullet under Alternative B, the management of nonmotorized and nonmechanized trails is not discussed.	REC01-General, ALTO7-Modification of Existing Alternatives, TRAVEL01-General	Though not discussed in the Executive Summary of the RMP/EIS, Chapter 2 in the Travel Management section discusses elements of management for non-motorized and non-mechanized trails under Alternative B. The agencies have added a bullet discussing nonmotorized and nonmechanized trails under Alternative B in the Executive Summary section.
15439-15	Jason Keith Moab, UT 84532	Access Fund	Raptor Closures Climbers have a long history of effectively supporting appropriate access restrictions to protect cliff- nesting raptors. The final BENM RMP should provide more clarity regarding proposals for the current voluntary raptor avoidance areas at Indian Creek. Each year these avoidance areas have continued to expand with little transparency on where the nests exist, or if they are being occupied. The large avoidance areas that are recommended each year for Indian Creek are more expansive than similar closures elsewhere, and the BLM could provide more clear justifications for such closures such as evidence of disturbance by climbers. These closures can cause substantially more traffic at the walls that are not restricted, potentially contributing to a larger impact at the open areas. And the avoidance areas, which are not technically closed, can cause confusion even conflict among climbers. As drafted the RMP appears to convert the voluntary seasonal closures to regulatory closures going forward. Under all action alternatives, seasonal visitation closures would be implemented to protect nesting raptors, provide natural resource rest, or support traditional uses. Such management would temporarily reduce the amount of climbing available to recreationists but would protect the natural quality of the recreation setting by allowing for resource rest and wildlife habitat. Also, Alternative E would implement area closures as necessary to prevent recreation-caused damage. Such closures would limit recreational access to such areas of BENM and likely redirect visitors to open areas of the Monument, potentially resulting in crowding but allowing for needed resource rest and potential recreation benefits if such areas are reopened. Additionally, the agencies would coordinate with the Tribal Nations and the BEC to close active raptor nesting areas to visitation as necessary to provide for nesting success. An example of this would be widespread closures in Indian Creek, which is the only dedicated climbing area on BENM. The Draft RMP does indicate that	REC01-General, ALTO7-Modification of Existing Alternatives, WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	The Proposed Plan will clarify closures as they pertain to climbing. See the Recreation section in Chapter 3 for impacts to climbing from closures. The agencies will not share exact locations of nests in order to protect the nest sites. The agencies consider the nesting buffers recommended by the "USFWS Utah Field Office Guidelines for Raptor Protection" while also providing access to climbing areas, where appropriate.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			during observed active nesting period, conduct surveys for nesting native birds prior to implementation of projects. If nesting birds are observed, avoid discretionary actions that would impact these nesting birds for the duration of the nesting period. These widespread regulatory closures represent a significant change to climbing at BENM and we urge the BLM to better clarify that these closures are no longer voluntary avoidance areas, the reasons for such closures, the specific scope of each closure, and the process for reviewing the closures and conditioned for when access restrictions may be lifted.		
889-65	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We also strongly oppose the compete seasonal closure under alternative E to all recreation in MSO PACs from March 1 - August 1, which would make a large area of the monument, including some of the most popular areas for hiking and multi-day backpacking such as Upper Arch Canyon, Texas Canyon, Dark Canyon, and Fable Valley, off limits to the public during the most popular times of the year. Alternative E acknowledges this would have a severe negative impact on recreation, yet the agencies seemingly do not care, choosing instead to prioritize the minute impacts from hiking on Mexican spotted owls over the immense recreational value of these areas. Habitat loss, not recreational activities like hiking and camping, are the primary threats to these birds, and there is no scientific evidence whatsoever supporting such extreme restrictions on harmless recreational activities that pose little or no threat to them. The restrictions on recreation in MSO PACs in alternative E are the epitome of arbitrary and capricious and must not be carried forward in the final management plan.	REC01-General, ALT07-Modification of Existing Alternatives, WILDFISH02-Wildlife Habitat	See the Wildlife and Fisheries section in the Proposed Plan. The Proposed Plan states that and education and interpretation would be used to inform visitors of appropriate behaviors to minimize impacts to nesting MSO. Casual overnight users would be encouraged to not use PAC areas. Commercial guides would not be allowed to use PAC areas for overnight use from March 1 to August 31. If adverse impacts are occurring to MSO occupied habitat or PACs then group size limits can be implemented and camping may be limited to designated sites or closed if needed. Wildlife, and particularly threatened and endangered species, are objects described in Proclamations 10285 and 9558, which the agencies are directed to protect. In the Proposed Plan, these measures will help protect MSO while still allowing for recreation use consistent with protection of BENM objects.
18295-4	Kira Ratcliffe		The preferred alternative also mentions an annual rest period the details of which will be determined in the future. I would like to see the management plan roughly outline criteria for this. For example, limiting it to only a few months of the year, preferably in a low use season like winter or summer.	REC01-General, ALT08-Selection of the Preferred Alternative	Under the Proposed Plan, the need for seasonal closures would be determined in collaboration with the BEC, and these closures may relate to the protection of any BENM objects. The Management Actions Common to All Alternatives section in the Recreation Use and Visitor Services section of the Proposed Plan provides some additional information these closures, and closures are discussed in the analysis in Appendix N.
1722-1	Tyler Smithson		The draft plan's recognition of continued access and maintenance for existing climbing routes is appreciated. However, more information is needed regarding potential permits and fees associated with climbing activities. Climbers also advocate for a programmatic authorization process for establishing new routes requiring fixed anchors.	REC01-General, ATTN07-Request for documents or information	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
8305-3	Tracy Bodnar		Comb Ridge canyons (off Butler Wash) are being overused and cliff dwellings and rock art sites are being harmed. Social trails and cattle trails are causing serious erosion. Management must regulate the amount of people and cattle so that fragile cultural sites are not adversely impacted.	REC01-General, CUL01-General	The RMP/EIS provides a full range of alternatives that includes varying levels of restrictions on recreation in the Comb Ridge area to allow for the proper care and management of Monument objects and values. The RMP/EIS also stipulates land health assessments of livestock grazing allotments, including Comb Wash, to inform grazing use practices under Alternatives B, C, and D, located in Livestock Grazing under Environmental Consequences, in the RMP/EIS. Additionally, under all alternatives analyzed in the RMP/EIS, the BLM and USDA Forest Service can apply restrictions Monument uses if ongoing impacts to resources are observed and restrictions are necessary to provide for the proper care and management of Monument objects and values.
8424-4	Janet Slowman Chee		I'm very interested in this mountain. I'm a Dine, I'm a veteran, and then I also worked with the Forest Service. I live here. I'm more concerned about the mountain, the safety and the environment thing; so what I'm saying is I'm worried about the roads, the treading. It's ripping up the land, the herbs. That's why I really don't care for it on that mountain.	REC01-General, CUL02-Traditional, Religious, or Cultural Use	See the Travel and Transportation Management section of the Proposed Plan. The agencies will complete implementation level travel management planning which will include further analysis and actions to protect Monument objects, including traditional plants.
12746-11	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	Our opposition to concerns around Alternatives B and C are centered around three issues: First numerous recreational benets are asserted to be coming out of these Alternatives, but we cannot identify any management decisions that would support these conclusions. Rather all management decisions and guidance provided would make expanding recreation more difficult rather than easier. Rather than identifying Special Recreation Management Area (SRMA) type designations where recreational access could be improved and expanded, every management designation would make recreational development more difficult as existing SRMA designations are greatly reduced in size or are simply redesignated to Extensive Recreation Management Areas (ERMA) designated areas. The Organizations have never seen this type of management model expand recreational access.	REC01-General, DATA01-Analysis Methods and Data	Because recreation is specifically excluded as a Monument object to be protected in Proclamation 10285, the expansion of recreational access, unless for the specific purpose of protection of BENM objects, does not meet the purpose and need. The Proposed Plan includes six Management Areas and seven Sub-Areas, each of which includes an objective of managing recreation consistent with protection of BENM objects. See Appendix E, which identifies allowable recreational activities, as well as the Management Actions and Implementation Level Actions which support the desired conditions to support those uses in each of the Management Areas and Sub Areas. This includes improved infrastructure in Front Country Zones, development of backcountry trailheads to support protection of BENM objects, and improved interpretation throughout BENM.
12746-8	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	Our concerns around the failure to analyze changes such as moving from an SMRA to an ERMA type designation extend far beyond types of recreation allowed at sites. SRMA designations are a priority funding area for funding provided under the Land and Water Conservation Fund Program (LWCF). As LWCF was fully funded with the passage of the Great American Outdoors Act in 2018, signicant reductions in SRMA acreage could greatly impact funding available for management. While National Monuments are also a priority funding under the LWCF program as well, a monument with a larger number of SRMA simply will be more competitive for this program. Given the collapsing land management budgets we have faced for decades, the Organizations must wonder why every effort	REC01-General, DATA01-Analysis Methods and Data	Because recreation is specifically excluded as a Monument object to be protected in Proclamation 10285, the expansion of recreational access, unless for the specific purpose of protection of BENM objects, does not meet the purpose and need. The Proposed Plan includes six Management Areas and seven Sub-Areas, each of which includes an objective of managing recreation consistent with protection of BENM objects. See Appendix E, which identifies allowable recreational activities, as well as the Management Actions and Implementation Level Actions which support the desired conditions to support those uses in each of the Management Areas and Sub Areas. This includes improved infrastructure in Front Country Zones, development of backcountry trailheads to support protection of BENM objects, and

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			would not be made to align planning efforts with funding criteria to allow this limited funding to be directed to priority areas.		improved interpretation throughout BENM. While there may be some budgetary advantage to the designation of SRMAs, the Proposed Plan must meet the purpose and need of protecting BENM objects.
10626-2	Debra Van Putten		In reviewing the Draft EIS, I am shocked at how one-sided the assessment is. The panel of experts is basically ignores recreation, and specifically disabled recreation, as a part of why Bears Ears is a National Monument. There are 115 people named as participating in the production of the draft EIS, with the largest contingent from area Native American tribes. There are only 4 government people indicated to have any expertise in recreation or visitor services generally, far lower than the number providing expertise in soil crusts or livestock management, the majority of which 4 people have recreation as only secondary in a list of interests. There were zero experts on OHV recreation (which would include my use of the Monument and the use of many, and even worse, zero experts on accessibility issues. It is hard to understand how BLM could have performed a non-arbitrary, fair assessment of the options when no experts were consulted with respect to one of the biggest uses of the Monument, and 115 experts were consulted for the supported uses. It is hard to imagine such a lopsided list of experts developing a complete range of options or understanding/advocating for the value of recreation.	REC01-General, DATA02-Inadequate Methodologies	The panel of agency staff analyzing recreation resources during this planning effort are qualified in recreation resource management development, recreation impact analysis, and expertise in a wide variety of recreation topics including OHV and accessibility. The agencies have used the best available data in their analysis of recreation and travel. The agencies have requirements to follow laws related to accessibility. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically not identified as a Monument object to be protected.
12746-30	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The Proposal fails to address the fact that existing management of recreational opportunities in the planning area has been found effective in protecting resources. Questions such as: How could existing management be adapted to align with the Proclamation? are simply never addressed. After reviewing the Proclamation and identifying the numerous recreation opportunities identified, we are unable to identify if these opportunities area are even in an SRMA for protection and development.	REC01-General, DATA02-Inadequate Methodologies	The agencies have designed recreation management alternatives that address both the protection of Monument objects and the importance of recreation as a use of Monument lands. The impacts of existing management are described throughout the RMP/EIS as Alternative A. Please see the Recreation Appendix for detailed descriptions of recreation activates, experiences, and benefits for the various SRMAs, ERMAs, RMZs, Management Areas, and Sub-Areas.
18657-21	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The drastic restrictions on all forms of recreation proposed in Alternative D are simply not warranted and are utterly unnecessary to protect the monuments objects and values. Indeed, these kinds of excessive restrictions are precisely what the opponents of the monuments designation feared and are what made it so controversial in the first place. If Alternative D was adopted as the basis for the monument management plan, it would likely galvanize increased political opposition to the monument that could result in BENM either being re-shrunk by a future president or abolished altogether by Congress. We urge the agencies to think long and hard about the potential consequences before incorporating any element of this extreme alternative into the final management plan. We request that the EIS fully analyze the impacts of this alternative on recreation opportunities within the monument, including specifying exactly how many roads would be required to be closed and what recreational opportunities would be lost as a result. We also note that as part of the basic requirement under NEPA to analyze all impacts on the human environment, the agencies must fully analyze the economic impacts to nearby communities from closing most of the monument to recreation.	REC01-General, DATA02-Inadequate Methodologies	See the Proposed Plan for Recreation Use and Visitor Services management actions. The Recreation section discusses impacts of recreation management actions on recreation opportunities. The Environmental Consequences includes miles of designated routes within OHV closed areas (see also the map in Appendix A, Routes within off-highway vehicle area designation). Specific route designations will take place during implementation level travel management planning. See the Environmental Justice and Social and Economic Values section in Chapter 3 to review the economic impacts to nearby communities from recreation management actions.
12746-29	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The Organizations are very concerned that the Proposal systemically makes assertions of generalized benefits to recreation but fails to connect these generalized benefits with actual management decisions and standards proposed. Often positions such as more recreational use would result from an Alternative when compared to current management are stated but not meaningfully addressed. This is a problem in isolation when addressing NEPA compliance, but this problem is greatly expanded given the recognition of a wide range of recreational uses identified in the Proclamation and that economic contributions from recreation are identified as an important value in the Monument. The open-ended nature of the entirely new management standards for cultural landscapes compounds our concerns on the ability to provide even basic infrastructure to support recreation on the Planning area. If the Proposal cannot identify general areas to be improved and explain the general nature of the improvement, implementation of these standards will be impossible.	REC01-General, DATA04-Cumulative Effects Analysis	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. More recreational use is anticipated on the Monument as a general trend.
12746-6	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	Any assertion in the Proposal that recreational access will improve without these types of designations is problematic as there are no newly designated SRMA areas and several Alternatives almost entirely remove these SRMA designation from the plan or reduce them to EMRA designations with highly generalized requirements. The Proposal position is directly contrary to our experiences and with BLM national guidance on the use of SRMA designations. Many of these existing designations could have been easily updated or amended to come into compliance with the Proclamation. When the proposed changes between existing management and Alternative B are reviewed there can be only one conclusion, which is that SRMA designations for recreational improvement and expansion have been entirely removed from management moving forward. For this reason alone, we are opposed to Alternative B, as we are unable to understand how recreation will be protected in the Proposal. This is critical as recreational usage of the area is identied as a characteristic of the area to be protected and Alternative B is proposed to be the most advantageous for recreational usage of the area.	REC01-General, DATA04-Cumulative Effects Analysis	Because recreation is specifically excluded as a Monument object to be protected in Proclamation 10285, the expansion of recreational access, unless for the specific purpose of protection of BENM objects, does not meet the purpose and need. The Proposed Plan includes six Management Areas and seven Sub-Areas, each of which includes an objective of managing recreation consistent with protection of BENM objects. See Appendix E, which identifies allowable recreational activities, as well as the Management Actions and Implementation Level Actions which support the desired conditions to support those uses in each of the Management Areas and Sub Areas. This includes improved infrastructure in Front Country Zones, development of backcountry trailheads to support protection of BENM objects, and improved interpretation throughout BENM.
18657-52	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	While the RMP has remarked on the social, economic, and community benefits of OHV recreation and other forms of outdoor recreation, value and preservation of these recreational uses has been dramatically minimized, with correlating deference for the religious and cultural values of native American tribes have been elevated above the values of the American public and multiple uses.	REC01-General, DATA04-Cumulative Effects Analysis	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			Likewise, environmental conservation is used as justification for minimization or elimination of public access and multiple uses. Both environmental and cultural resources are already protected throughout BENM via a litany of existing legal and congressional policies. These include NEPA, FLPMA, the Clean Water Act, Clean Air Act, Endangered Species Act, and National Historic Preservation Act, among many others. As discussed earlier in this comment letter, none of the five alternatives presented in the draft RMP represent a pro-recreation emphasis. Neither to any of the alternatives represent a pro-multiple-use context. The draft RMP as currently written fails to address outstanding values other than environmental and cultural resources, and fails to address or prevent far-reaching negative cumulative impacts on social, economic, and recreational uses.		10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. Alternatives Considered but not Analyzed in Detail includes consideration of alternatives aimed increasing motorized access and alternatives that prioritize multiple uses over protection of BENM objects.
9096-4	Josie Caringi		Furthurmore, frequent evaluation of recreational impact should be considered to allow for the most informed management, as well as cultural respect and sensitivity requirements for visitors at the BLM office before recreation. Both of these things I believe would allow for recreational use where appropriate while mitigating harmful effects from the start.	REC01-General, DECI04-Mitigation and Monitoring	Monitoring will be utilized to determine where adverse impacts from recreation are occurring on BENM. Such monitoring data will be used to inform adaptations in management of recreational resources to mitigate those impacts. For instance, under the Proposed Plan, group sizes and allocations will be reevaluated every three years in the Cedar Mesa Management Area (See Appendix E, Recreation, and Appendix P, Monitoring Strategy)
17573-30	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	In its Draft Alternative letter dated April 14, 2023, the State again outlined its concerns regarding the use of recreation management zones throughout the monument and indicated that management zones need to be narrowly tailored to the recreational needs and concerns of each specific area. The State referenced the BLMs Recreation and Visitor Services manual-H-8320-1 and how SRMAs and RMZs could be used to avoid and limit unresolvable conflicts and promote responsible management of the landscape if found necessary. However, the State then went on to ask the Agencies to not dedicate large swaths of the monument to specific niche uses in expansive management zones. Managers can always exercise their discretion and choose not to do something, but they need that discretion to make site-specific proactive management decisions in a timely manner when these issues arise. As an example, see the Outdoor Recreation and Tourism section of the SRMP which prioritizes improving recreational access and removing unnecessary barriers so all Americans can enjoy outdoor recreational experiences.16 Dedicating over 80% of the monument to a status of non-use and inaccessibility, as proposed in the preferred alternative, most definitely does not comply with the States plan for recreation.	REC01-General, DECI07-Compliance with other laws and policies	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenters concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details). While under the Proposed Plan the Remote Zone has been more closely aligned to protected areas such as designated wilderness, WSAs and LWC protected for those characteristics, management within the Remote Zone does not in and of itself specifically protect wilderness character or wilderness characteristics. In the Proposed Plan, Management Areas and Sub Areas are also included to manage recreation, which follow similar policy to Manual H-8320-1.
18965-4	Simone Griffin	BlueRibbon Coalition	Every time motorized routes or areas are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else. As a result, the BLM/USFS has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans. The Biden Administrations focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The BLM/USFS is therefore required by this executive order and others mandating that federal agencies consider environmental justice in NEPA proceedings to consider whether any route closures in the Bears Ears Resource Management Plan would disproportionately harm disabled users ability to access public lands. Any approach to management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized access on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. It is imperative that the BLM/USFS consider the access needs of disabled users in drafting the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access. Expanding trail networks for all user groups, as well as new user groups such as ebikes, dispersed camping and overlanding needs to be analyzed and incorporated into an alternative. Motorized access provides the best opportunities for those with disability access issues and the RMP is the best resource for the BLM to comply with the Equity Action Plan.	REC01-General, DECI07-Compliance with other laws and policies, ALTO7-Modification of Existing Alternatives	The BLM manages motorized recreation act in accordance with applicable law and the Rehabilitation Act.
12746-35	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	Given the numerous critical terms such as a cultural landscape are not defined, the horribly inaccurate economic analysis and failure to provide any information on issues such as soundscape planning and ACEC designation clearly alternatives have been overlooked in the creation of the Proposal. The Organizations believe that these failures have caused a range of alternatives to be presented that is simply legally insufficient. As an example of the failure to provide a range of alternatives, Alternative D makes the entire monument an Area of Critical Environmental Concern. This would directly conflict with the Proclamation as many other uses are recognized in the Proclamation outside protection of natural resources. Alternative E provides an alternative that in no way aligns with BLM or federal public lands management requirements. The remaining alternatives are artificially limited in scope, as exemplified by the requirement to develop a soundscape management plan for the management area despite this not being required in the Proclamation. Rather the Proclamation mentions solitude in specifi locations, not entire planning area.25 The need	REC01-General, DECI07-Compliance with other laws and policies, DATA01-Analysis Methods and Data	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. The agencies have developed a reasonable range of alternatives and a legally defensible Proposed Plan that aligns with the mandates of Proclamation 10285. Existing management is addressed and analyzed alongside the action alternatives for all resources under Alternative A.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			for a soundscape plan on every Alternative is 25 further evidence of the predetermined range of alternatives provided, there is simply no data provided to identify the need for this type of plan. It clearly is not required in the Proclamation. The failure of the Proposal to provide a legally sufficient Range of Alternatives is further evidenced by USFS lands management under every Alternative provides for OHV closures to move from 46k acres closed to motorized to 177k for all Alternatives. As addressed in greater detail in other portions of these comments, the failure of the Proposal to align assertions made with existing standards of management is problematic to the range of Alternatives. The evaluations of the effectiveness of the current management standards make these existing management standards even more relevant. Despite these conclusions existing management simply is not addressed in the Proclamation. Many recreational designations and existing decisions could be slightly amended and updated to comply with the Proclamation. The effectiveness of OHV management in protecting cultural and other resources was clearly and directly stated in 2015 Monticello RMP Evaluation found OHV management effective to protect resources. This 2015 evaluation clearly stated this as follows: [see letter for table]		
12746-25	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVCO	The Proposal spending proles cannot be aligned with the conclusions of partner research adjacent to the planning area. The immense conict of the economic proles used for calculation of economic contributions from recreation are again highlighted when compared to research created by the USFS, BLM and state managers. The Colorado Off-Highway Vehicle Coalition has partnered for decades with the USFS, BLM and Colorado Parks and Wildlife to provide high quality economic data for motorized recreation in the state of Colorado. COHVCO recently updated this research and released a detailed analysis of these conclusions and process for use in planning. A copy of this work is attached as Exhibit 2 to these comments. While the Proposal and the COHVCO research assert to be using many of the same tools, such as the INPLAN database the conclusions simply cannot be reconciled. The alignment of the COHVCO research and the NVUM data that has resulted from decades of research and is outlined in the works of White also cannot be overlooked.	REC01-General, EJSOC01-General, DATA03-Suggest Additional Data Source	Recreation patterns vary vastly from one area to another. As an example, Recreation patterns in the nearby Moab Field Office, particularly around motorized recreation are vastly different from the BENM region. The agencies use the best available information. The agencies appreciate the further documentation.
1689-1	Ralph Ferrara UT		The concept of resource rest in the plan is not defined. A reader might assume that resource rest pertains to ecological processes and the rehabilitation of vegetation, but it is not clear. In multiple references, resource rest is cited as a reason to close areas to use, along with traditional use, often to be determined by the Bears Ears Commission (2-15, 2-45, 2-62, 2-63, 2-84, etc.). The concept of resource rest for ecological processes is already a well-established pattern in Indian Creek, specifically as it pertains to rock climbing. The voluntary, highly successful closures of multiple cliffs every Spring in Indian Creek for raptor nesting season is an example of resource rest that needs no further legislation. Due to the harsh seasonal climate, Indian Creek already experiences several months of resource rest each year: in the winter months, very few visitors exist in Indian Creek, and in the heat of summer, it is the same. Only a very small handful of mostly local climbers visit Indian Creek in summer, and they are usually heading home before noon. There is no further regulation needed with regard to resource rest in Indian Creek. If tribes wish to introduce use of Indian Creek for traditional practices (3-415), there is no need to close areas. As there are extremely low numbers of visitors in winter or summer, traditional uses in those seasons can ensue unimpeded.	REC01-General, HABVEG01-Vegetation, CUL02-Traditional, Religious, or Cultural Use	Resource rest could include the raptor nesting closures referred to in the comment, as well as rest that occurs during the winter and summer.
17573-112	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	ES-5.1.13 Natural Soundscapes On page ES-19 the plan states, Alternative B would limit drone takeoffs and landings to routes designated in a manner that allows for such use in a travel management plan (TMP), to focus use where other human-generated noise would occur, while prohibiting takeoffs and landings within 300 feet of developed recreation facilities to protect these areas from increased noise associated with drone use. Under Alternatives C, D, and E, public drone takeoffs and landings would only be allowed if permitted through formal authorization and only when it would be beneficial to protecting BENM objects, resulting in further protection of BENM soundscapes compared to Alternatives A and B. Two airstrips would continue to be open for landing or takeoff of aircraft under Alternative A, but no new backcountry airstrips can be designated under this alternative without implementation-level planning. Under Alternatives B, C, D, and E, additional landings and takeoffs at backcountry airstrips, beyond the two identified under Alternative A, could be allowed through a formal authorization process, only if the use is beneficial to BENM objects, potentially resulting in increased impacts to soundscapes adjacent to these existing but undesignated airstrips. FFSL recommends that all the alternatives include emergency fire management situations that may require takeoffs and landings and that prohibiting landings and takeoffs to protect natural soundscapes should not be considered when emergency wildfire situations are occurring, and human health and safety are at risk.	REC01-General, NOISE01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and the Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Impacts of aircraft on the natural environment are discussed in Backcountry airstrip use and impacts are discussed throughout the RMP/EIS. OHVs are defined in 43 CFR 8340.0 and include motorized aircraft and drones when on or immediately above public lands and waters, and when not being used in an authorized or emergency capacity, therefore by definition and regulation motorized vehicles used for emergencies are not subject to the OHV designations in the plan.
16784-21	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Table 2-19: The impacts of recreation on paleontological resources are variable depending on the type of activity and the location. SVP asks that any allowed recreational activities be consonant with the protection of paleontological resources and that areas with important paleontological sites or high Potential Fossil Yield Classification (PFYC) ratings (i.e., rating of 4 or 5) but excluded from recreational activities that are likely to result in degradation.	REC01-General, PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Proposed Plan under Goals and Objectives, agencies would protect paleontological resources in BENM and foster public awareness and appreciation of the paleontological heritage. Under the Proposed Plan in Paleontological Resources, the agencies have actions that would seek to protect paleontological resources in collaboration with the BEC through implementation planning around recreation. See Appendix N, Impacts Common to All Alternatives (Paleontological Resources and Geology).

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
16784-22	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	The use of off-road vehicles (ORV) has great potential to harm paleontological resources at or near the ground surface, so SVP prefers alternatives that specifically restrict or close access for the use. Where ORV access is permitted, SVP prefers that vehicles be used only on preexisting vehicle trackways unless specific permission to go off them is granted. SVP asks that any decision-making should be made in consultation with the agency's qualified paleontologists in the region, which is consistent with the BLM and USFS duty to manage these resources using scientific principles and expertise (43 CFR Part 49 49.30 and 36 CFR Part 291 291.1).	REC01-General, PALEOGE002-Related to research communities, local communities, and visitor experience, ALTO7-Modification of Existing Alternatives	There are no OHV-open areas in BENM under any of the alternatives, meaning that all OHVs will be required to stay on designated routes. In addition, under the Proposed Plan in Travel and Transportation Management, 638,301 acres of BENM are closed to OHV use meaning vehicles are not allowed in those acres. Protection of paleontological resources is also discussed in Appendix N, Impacts Common to All Alternatives (Paleontological Resources and Geology).
15334-5	Bailey Brennan	National Wildlife Federation	Regardless of the approach the BLM and Forest Service take regarding visitation and recreation, the agencies should continue their commitment to engaging with Indigenous communities and the BEC in identifying, preventing, and mitigating potential risks of increased visitation to cultural resources and uses.	REC01-General, PUBL02-Bears Ears Commission	The agencies intend to continue to involve the BEC in the management of BENM.
18657-7	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	There are several items of critical import noted within the RMP statement of Purpose and Need (pages 1-3 and 1-4), including the imperative to acknowledge and incorporate into the RMP final decision: Recreational visitation is an important driver of the local economy, with the area becoming world famous for rock climbing and the increased popularity of off-highway vehicle (OHV) use, cultural tourism, and other forms of recreation. Planning decisions can define resource uses and land designations to help resolve conflicts between various uses and object protection. Provide for uses of Monument lands, so long as those uses are consistent with the protection of BENM objects. Recreation as a core component of the multiple-use mandate for public land management is not adequately represented or accounted for within the RMP. While future project-specific NEPA analysis and travel management planning will occur, and public comment will be provided during those phases of NEPA analysis, if the RMP does not preserve designated OHV routes, designated OHV riding areas, and designated outdoor recreation of other forms at the programmatic (RMP) level, the BENM planning team is subsequently, deliberately creating a framework to pit protection of monument objects against outdoor recreation at a point within the planning process wherein Recreation as a core use and resource will be grievously disadvantaged in having any reasonable opportunity to advocate to protect existing designated recreation areas.	REC01-General, PURNE01-Purpose and Need	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E.
889-113	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	If the Travel Management Rules mandate that motorized travel is to be considered a legitimate recreational use of Forest Service lands has any meaning, it demands that the Forest Service treat motorized and non-motorized users as equals. The same is true for the BLM. Rather than allocating routes based on a presumed hierarchy of users with non-motorized users at the top and motorized users at the bottom, the agencies should treat the recreational experiences of both groups as equally valuable. That does not mean that motorized use must be allowed on every route in the monument. But it does mean that where motorized use has historically been allowed, the presumption should weigh in favor of allowing that use to continue, with all user groups sharing the route under the principle of multiple use. Wherever possible, the agencies should allow for a wide variety of uses in keeping with its multiple use mandate, rather than playing favorites between user groups and robbing one in order to give to another. Where user conflicts are occurring, the agencies must endeavor to follow an approach which balances the interests of both competing user groups, rather than automatically presuming that one must be sacrificed to favor the other.	REC01-General, TRAVEL01-General	The agency has the authority to manage recreational uses through implementation level travel management planning following the process outlined in BLM H-8342 Travel and Transportation Handbook. The handbook states: "Areas, roads, and/or trails are designated closed if closure to all OHV use is necessary to protect resources, promote visitor safety or reduce user conflicts." Motorized routes will be designated under travel management planning, which will be an implementation-level effort. OHV closed area designations are not made out of a preference for one kind of recreation over another, but rather to provide adequate protections to Monument objects, special designation areas, and other resources. Under the Proposed Plan, motorized use would be allowed in Arch Canyon under a permit system. The permit system would be developed as part of the BENM Travel Management Plan in the future.
889-110	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Properly defining which category of user conflict is occurring in a particular area is critical to resolving that conflict. Interpersonal conflicts involve specific situations that can be resolved with practical solutions. For example, where motorized recreationists and hikers share the same route and experience conflicts such as hikers feeling endangered by vehicles approaching them at high speeds, such interpersonal conflict could be addressed by measures designed to control motorists speed. Separating users can also be an effective solution, such as by relocating a hiking trail onto a separate path. With social values / ideological conflict however, there often is no practical solution, as one group is so ideologically opposed to the other groups activity that its mere presence on public lands in any capacity is offensive. As the Carothers study described in reference to managing hunting on Mount Evans in Colorado, Even though nearly all of the nonhunters did not physically observe any hunting-associated events (e.g., seeing hunters, seeing an animal being shot), many expressed a conflict in social values. Simply knowing that hunting occurred on the mountain was apparently sufficient to activate perceptions of conflict. ³⁶ In the case of social values conflict, the root problem is the ideologically-driven intolerance of one user group toward another. No amount of on-the-ground management can mitigate this form of user conflict. As long as the disfavored user group is allowed to have any presence on public lands at all, the intolerant group will still perceive conflict.	REC01-General, TRAVEL01-General	The Proposed Plan, and later implementation-level travel management planning, does and will consider the body of research on recreation conflict, including review by the Congressional Research Service, which documents interpretation of the interchangeability of "use" and "user" related to this topic as grounded in BLM policy handbooks 1221-2, 2930-1 and 8320-1, through rulemaking in 67 FR 61732, and documented in other associated guidance. The agency has the authority to manage recreational uses through implementation level travel management planning following the process outlined in BLM H-8342 Travel and Transportation Handbook. The handbook states: "Areas, roads, and/or trails are designated closed if closure to all OHV use is necessary to protect resources, promote visitor safety or reduce user conflicts." Motorized routes will be designated under travel management planning, which will be an implementation-level effort. OHV closed area designations are not made out of a preference for one kind of recreation over another, but rather to provide adequate protections to Monument objects, special designation areas, and other resources. Under the Proposed Plan, motorized use would be allowed in Arch Canyon under a permit system.
18238-55	Chaitna Sinha		We propose: Delete the following management action: Implementation-level travel planning will not designate new motorized or non-motorized routes in riparian areas, 100- year floodplains, and perennial springs and seeps where monitoring has shown degradation to these resources necessary to protect BENM objects. Id., p. 2-123. This prescription is redundant. We have incorporated its provisions in our recommendations.	REC01-General, TRAVEL01-General, ALTO5-Alternative E	The Proposed Plan reads as follows: "Implementation-level travel planning would not designate new motorized and mechanized routes in the following areas unless necessary to ensure the protection of BENM objects, public safety and in collaboration with the BEC: • Riparian areas • Wetlands

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					• Water resources, including 100-year floodplains, and perennial springs and seeps where monitoring has shown degradation. • Crucial big game habitat • Big game fawning/calving habitat • Sensitive soils Implementation-level travel management planning would ensure motorized and mechanized routes that parallel or cross streams would be located to protect best complement riparian and aquatic ecosystems as well as road/trail and stream geometry. This includes locating crossings (fords) at points of low bank slope and firm surfaces wherever practicable. Existing trails would be maintained as necessary to protect BENM objects.” See Appendix H: Travel Management Plan Criteria. The Draft RMP/EIS already contains language regarding the prohibition of new non-motorized and non-mechanized trails in areas of sensitive soils unless necessary for the protection of BENM objects, in addition to the language cited in this comment regarding the protection of riparian, wetland, and water resources.
8999-24		International Mountain Bicycling Association	Because of the lack of mountain biking details in the DRMP, we are forced to advocate for a more liberal access alternatives and therefore are inclined to support more of what is defined in Alternatives A and B because these alternatives provide better future access while still managing within the confines of the proclamation.	REC01-General, TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The BLM and USDA Forest Service will develop implementation-level travel management plans that will be guided by the landscape-scale management direction provided in the RMP/EIS. The implementation-level travel management plan will assess existing motorized/mechanized trails and routes, as well as future needs and opportunities.
8999-4		International Mountain Bicycling Association	While the tribal co-management is long overdue, we are disappointed to see that Alternative E for the BENM does little to enhance meaningful bicycle offerings. Alternative E allows only the existing 3 miles of trails for bikes and forces any future bike travel on OHV routes while Alternative B is more supportable. The BENM Notice of Intent states under the purpose and need statement that planning decisions can help resolve conflicts between various uses and resource protection. Forcing bikes to share trails with OHV use causes conflict with OHV users. Restricting bicycle use to a mere 3 miles of shared pedestrian use causes conflict with pedestrians. These conflicts can be addressed by providing a more meaningful experience for BENM visitors looking for bicycle opportunities. The settings provided for by OHV routes are not a preferred bicycle experience. In the desert environment, sharing access with OHV routes leads to poor quality experiences not only from the incompatibility of OHVs with bikes but the condition of the routes due to the nature of powerful motorized travel. Navigating deep sand and loose boulders on a bike are not quality ways to experience the Monument. Again, we highly encourage the BENM management staff to revisit the BLMs GQTE guide to better incorporate quality and appropriate bicycle adventures in the BENM.	REC01-General, TRAVEL01-General, ALTO7-Modification of Existing Alternatives	None of the alternatives limit bicycle use beyond what is allowed within the existing travel management plan, which allows for bicycle use on all roads and trails designated for motorize use and a portion of the Bluff River Trail. Some alternatives also allow for decommissioned motorized routes to be converted into bicycle trails. BLM Manual 6220 - National Monuments, National Conservation Areas, and Similar Designations states "Monuments and NCAs will be available for a variety of recreation opportunities, consistent with the purposes for which each area was designated. Where recreation values are identified in the designating legislation or proclamation, these values will be conserved, protected, and restored pursuant to the establishing authority." In the case of BENM, Proclamation 10285 specifically excludes recreation as a Monument object to be protected.
916-8	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Recognize the Need for Long-Distance Motorized Trail Systems [see letter for further details and rationale]	REC01-General, TRAVEL01-General, DATA01-Analysis Methods and Data	The 2005 Travel Management Rule (36 CFR 212) is used to inform decisions related to the designation of roads, trails, and areas for motor vehicle use on lands managed by the USDA Forest Service. Under Presidential Proclamation 10285, new roads and motorized trails would only be constructed to protect objects in BENM and to protect public safety. Specific decisions on roads and trails will occur in future travel planning
19019-1	D Schier		My concern with the Bureau of Land Management's proposals is the move towards limiting/eliminating everyone's access to what should be our public lands. The Bureau of Land Management (BLM) and United States Forest Service (USFS) have a long standing reputation for limiting and denying access to BLM/USFS lands. On Cedar Mesa, the BLM does this by requiring permits for overnight use of Grand Gulch and Fish/Owl canyons, to name a few. This requirement excludes me from visiting/enjoying these areas1 * To be blunt, permits are dangerous and damage the very purpose many visitors are going to the backcountry to experience. Imposing artificial demands on backcountry travel eliminates the freedom that is the very essence of the wilderness experience. That freedom is both the joy and the safety of backcountry travel. If you don't believe me on the latter, just look at the number of people who have died because it flooded on the day they had a backcountry permit for the canyons of Zion National Park, or because the only day they could get a permit for The Wave was during the heat of the summer. What if you have the opportunity * to hike the canyons in good weather on Wednesday, but could only get a permit for intense weather on Friday? How about if you could have started hiking in the cool of the morning, but were instead forced to wait until the ranger station opened at 8am? Your permit desk is only open Monday through Friday:2 what if you have no access at those times? Personally, the most dangerous situations I have ever been in have been the times when outside influences (such as permits) demanded that I make decisions counter to my best judgment. Like it or not, demanding or encouraging people make poor choices makes the BLM and USFS culpable for the results. That's just the way it is.	REC02	Permits would be used as needed for the purpose of regulating recreational activity to protect Monument objects and may be used as a means of educating visitors or commercial guides/outfitters. Recreational permit systems and fees would be developed as part of implementation level planning.
19019-2	D Schier		A permit system typically requires one of several things. Going to a Ranger Station during business houn. On one occasion, I considered getting a permit in a less used area of the eastern Sierra. In order to get a permit, I would have needed to travel from the trailhead to the local ranger station, a distance of some 40 miles and over 2 hours each way, to arrive there at 8am, on the chance that a permit might be available. And what to do when the office is closed on the weekend? In short, even though the permit itself did not have a price tag attached, the cost of getting a permit was too much	REC02	Permits would be used as needed for the purpose of regulating recreational activity to protect Monument objects and may be used as a means of educating visitors or commercial guides/outfitters. Recreational permit systems and fees would be developed as part of implementation level planning.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			to bear. The BLM does much the same for Moon house, for example. Imagine camping near the Moon house trailhead, but needing to drive all the way to the Kane Gulch Ranger Station to see if a permit for that day is available, and then driving all the way back. By that time, the day is hot, not the cool of the morning, and you've needlessly (and perhaps fruitlessly) burned gallons of gas.		
18657-15	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Importantly, alternative C is the only action alternative which would continue to allow access to the interior corridor of Moon House, which is the most popular archeological site in the monument and one of its principal attractions. The loss of access to the spectacular interior of the ruin in every other alternative is a severe blow to recreation and would significantly harm the visitor experience in the monument. We support alternative Cs approach of continuing to allow access to the interior corridor while maintaining the existing stipulation that only 4 persons are allowed inside at a time.	REC02-Visitation and Visitor Experience	Although inadvertent, impacts from visitation do occur every time a visitor enters the interior corridors of Moon House, Recreation Use and Visitor Services has been updated for impacts to Moon House and cultural resources generally. Additionally, Moon House, while an important recreation destination for visitors, is not the most visited or most popular archaeological site in BENM. Visitation to Moon House will still occur under the Proposed Plan under an allocated permit system, like current management, but access to the interior corridor will be prohibited. This was analyzed in the management plan and this action will help preserve the site for future generations.
1837-3	William Facinelli		Third, the monument should be zoned for recreation, to confine impacts from people to limited areas.	REC02-Visitation and Visitor Experience	The Proposed Plan employs a zoned approach to recreation management.
12588-1	David Stoker		To gain support from the local community, I would also suggest providing residents of San Juan County either a discounted or a free annual pass. This would help alleviate what has been local opposition about federal government policies "taking away" access to monument lands.	REC02-Visitation and Visitor Experience	Permits would be used as needed for the purpose of regulating recreational activity to protect Monument objects and may be used as a means of educating visitors or commercial guides/outfitters. Recreational permit systems and fees would be developed as part of implementation level planning.
12592-1			Leave Indian Creek alone. That place is sacred to so many for so many reasons. Why create more trouble where folks can generally solve it themselves? Adding permits is awful and feels like poor folks are getting pushed further out of outdoor activities once again.	REC02-Visitation and Visitor Experience	Permits would be used as needed for the purpose of regulating recreational activity to protect Monument objects and may be used as a means of educating visitors or commercial guides/outfitters. Recreational permit systems and fees would be developed as part of implementation level planning.
14539-4	Rebecca Gillis		Seasonal Cycles: As we understand it, under Alternative E, seasonal cycles based on Traditional Indigenous Knowledge may be mobilized to best support the ecological values across BENM. Further information on how seasonal cycles may affect recreation access across the national monument is crucial for our community.	REC02-Visitation and Visitor Experience	The RAMP, which would involve a public process, may include more detail regarding seasonal cycles and their relation to recreation.
1659-6	Eve Tallman UT		A proposal to require permits for all day use in the Monument is cumbersome and unrealistic, and likely unenforceable. The stated goal to educate visitors about impacts, history and proper stewardship of the Monument values will be better served by more interpretive infrastructure that is informed by traditional knowledge. This can include signage and kiosks, brochures, on-the-ground stewards such as those already employed by the climbing advocacy organization Access Fund, and other docents. The area is not conducive to technology-based permit systems such as methods requiring a cell phone or cell signal. Pipe safe methods of collecting permit applications are also extremely staff intensive, resource demanding and expensive. It is not my understanding that any entrance gate booths are planned, so permits seem unenforceable and excessive.	REC02-Visitation and Visitor Experience	See Appendix E for information about development of interpretation and educational approaches by Management Zone.
1704-3	Ben Kiessel		As a climber that has been climbing in the Bears Ears National Monument area for the last 23 years, I appreciate that the draft plan allows for the continued use and maintenance of existing climbing routes in the monument. I have enjoyed exploring the BENM area without needing permits and fees and would like it to stay that way. However if thats not possible, if there was a way to make the permit/fee an online process that would be preferred.	REC02-Visitation and Visitor Experience	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
17617-21	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	Strategies to eliminate pedestrian trailing. Hiking and backpacking visitors can exacerbate damages to natural and cultural resources by wandering oﬀ trails or creating entirely new trails, especially in areas where trails are less discernible. This causes erosion of the ground and exposure of subsurface cultural materials. Our organization has noted, for example, how random trailing to and around the Split Level Ruin site in Grand Gulch has exposed buried materials like blanket fragments and shell beads that are susceptible to being taken. Additionally, the creation of cairned routes by visitors can expose sensitive backcountry sites for which no established route or monitoring schedule exists, exacerbating their impacts without agency personnel being made aware. Cairned routes created by skilled visitors can also lead those less skilled to hike along routes for which they are not prepared. This problem is especially abundant in the canyons of the Valley of the Gods, Butler Wash, and Comb Ridge	REC02-Visitation and Visitor Experience	In the Proposed Plan, visitors would be encouraged to stay on trails when hiking in the Monument. Additionally, under the Proposed Plan, rock stacking would be prohibited. See Environmental Consequences under the Recreation Use and Visitor Management Section in the Proposed Plan for management actions regarding hiking. Also see the same section for maintenance actions related to non-motorized and non-mechanized trails. Many actions noted by the commentor could be implemented on a case by case basis and could be further refined by the implementation level plans, such as the Cultural Resource Management Plan or the Cedar Mesa Recreation Area Management Plan, See Appendix T for implementation plans. These implementation plans and actions will include collaboration with the BEC and require compliance with applicable laws.
17617-23	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	We recommend a permit system be created for Navajo side permits. Rec.gov should be able to also sell or link to Navajo permitting to help with compliance of Navajo side camping along the river corridor. Currently Rec.gov is managing 3 reservable campsites in the Mexican Hat to Clay Hills section, but not for other well-known campsites along the river, like Chinle Wash, Eight Foot Rapid, Ledge Rapid, and more. A two-year time limit should be sufficient for a contractor to develop and manage. The agencies should work with contractors on developing this system.	REC02-Visitation and Visitor Experience	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Decisions regarding management of San Juan River left are reserved for the Navajo Nation in its role as a sovereign nation.
17617-7	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	Trash and human waste is a mounting management issue throughout BENM. Specifically, the lack of facilities and lack of enforcement of policies are contributing to a proliferation of waste across the landscape. Over the past few years, BEP has worked closely with the BLM to place temporary, portable toilets and educational signage throughout BENM. These and other areas should be analyzed to find permanent solutions to trash and waste disposal. In this analysis, careful attention should be paid to how current portable toilets are used. Composting toilets or similar restroom facilities could	REC02-Visitation and Visitor Experience	In the Proposed Plan, the agencies have included management actions considering human waste and allowing for adaptive management across BENM, see Management Actions by Alternatives for Recreation and Visitor Services See the Recreation section in Appendix N for specific management actions in certain Management Areas, where human waste is required to be packed out. Under the Proposed Plan, the agencies would coordinate with the BEC, Tribal Nations, federal and state agencies, and county and local governments in recreation planning, including trash control and removal. . Site-specific decisions about

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			be located at the current location of the portable toilets - near parking areas and trailheads. Additionally, interpretive signage could be used to help visitors use available facilities when they are present and pack it out in areas without waste disposal collection. Even a minimal investment in waste management would provide significant positive impacts on cultural and natural resource protection, and visitor experiences.		the construction of visitor facilities, such as restrooms, will be made at the implementation level as required and/or through development of the implementation-level Recreation Area Management Plan/Business Plan (see Management Actions Common to All Action Alternatives of the RMP/EIS).
1800-2	Richard Ellison 8003 28th Ave NE Seattle, 98115		I'd like to see more information regarding potential permits and fees for climbing activities. Also questions about any programs for establishing new routes that require anchors.	REC02-Visitation and Visitor Experience	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1807-1	Lucia Salt Lake City, UT		I'm particularly pleased that the plan acknowledges the importance of maintaining existing climbing routes within the monument. However, I share the concerns raised regarding the lack of clarity surrounding new route authorization, permit requirements, and associated fees. For the climbing community to fully embrace this plan, it's crucial to have transparent guidelines and assurances regarding access and management. I urge the BLM to work collaboratively with climbers and the Bears Ears Commission to address these important questions and ensure that climbing activities are supported sustainably within the monument.	REC02-Visitation and Visitor Experience	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input.
1810-7	Isaac Lindstrom 287 4th Ave Salt Lake City, UT 84103		Finally, the BLM/USFS/BEC needs to build an interagency center in Blanding or Bluff to serve as a single location where visitors can learn about the Monument during their visits. I am concerned about the dramatic increase in visitation without resources to educate people about the importance of Wag Bags, for example, or protecting ancestral dwellings.	REC02-Visitation and Visitor Experience	Although the development of a visitor center is outside of the scope of this planning effort, the Proposed Plan places infrastructure such as visitor centers on the periphery of BENM or in local communities. See the Recreation and Visitor Services section in Chapter 2. For more information on efforts to educate Monument visitors, see Cross Cultural Education and Outreach) and Recreation and Visitor Services of the RMP/EIS.
18560-6	Anna Peterson	The Mountain Pact	We also encourage you to manage recreation by using zones to concentrate visitors in the most appropriate places to protect the monument.	REC02-Visitation and Visitor Experience	The Proposed Plan employs a zoned approach to recreation management.
18605-1	Susan Shoemaker		I support and request that the BLM fund year round and increased staffing personnel at the Kane Gulch Ranger Station for education, emergency services, and monitoring of resources, and the associated infrastructure like adequate communication services, water, housing, hand held radios and vehicles, including fuel. Staffing should include several Law Enforcement Rangers, Interpretive Staff, Budget & Management personnel devoted to increasing and advocating for funding for Bears Ears Management, and Tribal Consultants.	REC02-Visitation and Visitor Experience	Agency funding and staffing is outside of the scope of this planning effort.
18605-3	Susan Shoemaker		I think the federal agencies within, should fund the emergency services provided by the county for visitation and thus related first aid and emergency visitor services, working in communication with County EMS Personnel. Currently the county responds to the majority of emergencies on federal lands, due to lack of planning on the federal agencies.	REC02-Visitation and Visitor Experience	Agency funding and staffing is outside of the scope of this planning effort. Due to jurisdictional responsibilities, on NFS and BLM lands, the responsibility for SAR response efforts generally lies with the local law enforcement authority in the county where such lands are located and with whom the agency has a standing agreement or relationship (see FS Manual §1596.03 and BLM Manual Series 1703).
18708-7	Heidi Blankenship Blanding, UT 84511		I'm not sure where or if visitor center development is covered in the plan, but if a visitor center is to be developed for BENM, please locate it in an area where plumbing, electricity, and cell service already exist. Off-grid visitor centers in remote environments have proven to be difficult and expensive for agencies to manage. Locating future services in a local town where employees can live in a community would be an excellent move for BENM. A gateway interagency VC (NPS as well as USFS and BLM) would be ideal.	REC02-Visitation and Visitor Experience	Although the development of a visitors' center is outside of the scope of this planning effort, the Proposed Plan places infrastructure such as visitors centers on the periphery of BENM or in local communities. See the Recreation and Visitor Services section in Chapter 2. For more information on efforts to educate Monument visitors, see the Cross-Cultural Education and Outreach and Recreation and Visitor Services of the Draft RMP/EIS.
18982-3	Daniel Kent 399 E 100N Moab, 84532	Friend of the Abajos	The monument is special because it has been established to protect spiritual, cultural and historic values, in addition to its beauty and ecology. Therefore, commercialization and development must only proceed when it enhances or protects these values. The monument should maintain the primitive experience, while also minimizing regulation, construction, alteration, (particularly road and campground creation) and all the signage and other developments expected in a park oriented to recreation. Here, the natural quiet and dark need to guide development, or restrict it, better yet. We should strive to be quiet about this place, because inevitably the numbers will increase with its popularity, and it is very hard to maintain intact wildlife, ecosystems and archeology as numbers of visitors rise. Perhaps the plan can immediately incorporate an ambassador program that will place an advocate/educator at highly visited ruins and other fragile spots during the high visitation seasons. Also, not publicizing or improving access to popular spots can preserve destinations, such as seems to be the case for Hammond Canyon.	REC02-Visitation and Visitor Experience	The Proposed Plan employs a landscape level Zone system in order to concentrate visitor services and education in already popular Front Country areas, while providing less services to attract visitors in the Remote Zone. Educational resources will be developed under implementation level planning, but ongoing partnerships such as the Site Ambassador and Site Steward program will be continued until those plans are developed.
1900-4	Dennis Hochwender 452 Bismarck Street Grand Junction, CO 81504		A large cow pie on the trail, greets hikers after they close the gate and start their hike. 10 days ago, I hiked Kane Gulch, carefully closing the green gate in hopes of keeping cattle out. No such luck, there is and has been fencing down and cattle have grazed over a mile down Kane Gulch. Backpackers have to wonder how they are going to filter the feces and urine out of the water as they go down the	REC02-Visitation and Visitor Experience	Under all alternatives, the agencies would "manage livestock grazing, subject to appropriate terms and conditions, in a manner consistent with the protection of BENM objects, including during periods of drought". See Livestock Grazing in Chapter 2 of the RMP/EIS for more information regarding grazing management.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			trail into Grand Gulch. We act as if Grand Gulch is the jewel of BENM, to be protected at all costs but we do nothing to keep it safe from cattle. Humans can be educated to visit with respect, cattle can not. Why limit people if we are not going to limit cattle. If noxious weeds, no biocrust, fouled water and broken down ancient dwellings are the goal, cattle are the solution. If we dont act soon it will be too late.		
3123-10	Russell Bodnar 5A Road 2976 Aztec, 87410Tracy Bodnar		The Kane Gulch Ranger Station should be improved with daily staffing and phone service, in order to provide hikers with current information on springs, trails, and road conditions when they are at home planning and when they arrive in the area. Other information could be found at Natural Bridges NM, perhaps with addition funded staffing for monument personnel.	REC02-Visitation and Visitor Experience	Issues related to budget and staffing are generally outside of the scope of this plan. The KGRS is considered for development or improvement under the Proposed Plan.
8122-2	Gregory Nelson		it should also thoughtfully be deeply considered the effect of human migration through the area, i.e. corridors that least effect the inevitable degradation of the natural landscape	REC02-Visitation and Visitor Experience	The Proposed Plan employs a landscape level Zone system in order to concentrate visitor services and education in already popular Front Country areas, while providing less services to attract visitors in the Remote Zone. Educational resources will be developed under implementation level planning, but ongoing partnerships such as the Site Ambassador and Site Steward program will be continued until those plans are developed.
8986-6	Britt Hornsby 190 N 3rd East Unit #1 Bluff, UT 84512	Town of Bluff	The "Existing Areas" list should include Sand Island. Sand Island is one of the most appropriate sites for the development of visitor services. Sand Island has two campgrounds, an active boat ramp (13k-15k people float the San Juan River yearly), currently in process of constructing the only fully ADA accessible trail in BENM, connected to the Bluff River Trail, three miles from the town of Bluff, and sites along HWY 191. Bluff supports the zone management approach to help simplify travel areas to visitors and protect objects of value. Bluff would like to see thoughtful development of visitor services to address the increase in visitation while keeping the natural character of the monument. Bluff would also like to see Special Recreation Permit applications move through the process more fluidly and timely. Coupled with a robust cultural site guide training, allowing guides to accompany visitors to sites helps protect the sites and landscape as well as provides job opportunities to our community and neighbors.	REC02-Visitation and Visitor Experience	Under the Proposed Plan, the Sand Island panels are in the list of Public Use sites identified in Management Actions by Alternative. Also see the Appendix H and Appendix E for further discussion of the Bluff River Trail and possible development and management of the Sand Island Campsite and Boat Ramp.
908-1	Lawrence Stoker Las Vegas, NV		Page 2-102 states that: "Permits would be required for private overnight and day use in all canyons." This is against the wild use of the area and adds unnecessary burden to both visitors and administrators. Who would manage the 100s of people to stay there every night? This is antithetical to the wild desert experience.	REC02-Visitation and Visitor Experience	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E.
9266-2	Evan Djikas 60614		I implore you to keep yhe romance alive and permits out of parks except when absolutely necessary for overcrowding purposes.	REC02-Visitation and Visitor Experience	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
F7-2			Interpretation about Hispanic/ Latino history at Bears Ears National Monument, and interpretation related to recreation should be provided in Spanish as well as English, and other indigenous languages as deemed necessary by the Bears Ears Commission. I support Alternative Es zoned approach to recreation management. This provides quality recreational experiences for all types of public land visitors while stewarding sensitive resources such as water, historical sites, wildlife habitat and more. Information about the zoning approach, and interpretation for any recreation site including: on-site, off-site, need basis, and information center interpretation resources should be available in Spanish in order to ensure that Spanish-dominant visitors can recreate with respect, learn about the significance of highly visited recreation areas, and feel welcome in the monument. More than 40% of Spanish speakers aged 18 and older in the U.S. do not speak English very well according to a 2023 U.S. Census report. Language access is an important dimension of making our public lands equitable for all to enjoy; ensuring that crucial information about the monument and at the monument is available in Spanish will encourage Spanish-dominant Hispanics and Latinos to feel welcome at the monument and help end the severe lack of access and representation on public lands felt across Hispanic and Latino communities nationally.	REC02-Visitation and Visitor Experience	The Proposed Plan states that interpretation and facility development will meet universal design standards, and specifically gives use of different languages to enhance accessibly as an example. See Section Health and Safety. Educational resources will be developed under implementation level planning. The BLM and USDA Forest Service recognize the needs of many visitors to the area, including the need for information in multiple languages and when possible provide information in other languages, including Spanish, Indigenous languages and other languages. Interpretative and educational products would be developmental as a part of plan implementation.
12438-7	Josh Ewing PO Box 328 Bluff, UT 84512		Similarly, the current RMP prohibits camping within 200 feet of water resources, a reasonable restriction to allow wildlife access to water and to prevent pollution of scarce water resources. The Preferred Alternative does not carry through is protection, but instead bans camping within mile of water sources, unless in an existing or designated campsite or area. Because existing and previously used campsites abound near water sources, this new provision is essentially meaningless in protecting water sources while likely confusing new visitors who dont know that many responsible campsites have been previously used that are within the -mile ban but safely outside of the 200-foot area previously used.	REC02-Visitation and Visitor Experience, ALT05-Alternative E	The Proposed Plan emphasizes use of Leave No Trace principles which provide for camping 200 feet from water sources. Additionally, no dispersed camping would be allowed within 0.25 mile of surface water, unless in an existing or designated camping area.
12438-8	Josh Ewing PO Box 328 Bluff, UT 84512		While the 2008 RMP calls for designated dispersed camping in culturally rich areas such as Cedar Mesa and Comb Ridge, the Preferred Alternative does not carry though this important protection. While it leaves this open as a possibility, the plan walks back a commitment to this important management protection. While designating camping is labor intensive, many surveys have already been conducted to assist with these decisions, and I encourage the agencies to make clear their	REC02-Visitation and Visitor Experience, ALT05-Alternative E	The Proposed Plan includes designation of dispersed sites in several Management Areas and Sub-Areas, including those referred to in the comment. See Appendix E.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			commitment to this management approach in high-tra4ic areas such as Comb Ridge and Indian Creek.		
15396-2	Kristen Henry		Archeological and other cultural sites will be better protected by restricting OHV access and grazing. Alternative E should also implement timing and visitation restrictions as needed to minimize impacts to archeological and historic sites.	REC02-Visitation and Visitor Experience, ALT05-Alternative E	The Proposed Plan considers the implementation of seasonal area closures and resource rest-related closures to protect Monument objects. See Cultural Resource Management, Indigenous Peoples' Religious Concerns, and Tribal Use in under Environmental Consequences for a discussion of impacts to cultural resources from OHV use and grazing.
18858-4	Lucia Christensen		Page 2-102 states that: "Permits would be required for private overnight and day use in all canyons. My questions: is the Indian Creek zone considered a canyon? Given the large land size and variety of uses of the Indian Creek zone, I would not support the need for day use permits. However, if it is to be done, I would suggest self-issued, paper permits at trailheads (given the remote nature of the trailheads, lack of cell phone service and potential burden of electronic kiosks). Permitting should NOT be done via recreation.gov because there is no Internet or cell service in the are and the fees are burdensome to the average user. There is so much variety for climbing, hiking and seeing in this zone that requiring people to advance-issue permits would kill the spirit of recreation within the canyon.	REC02-Visitation and Visitor Experience, ALT05-Alternative E	The Proposed Plan does not require permits for use in all canyons. Existing permits for locations such as Cedar Mesa Management Area and the San Juan River would stay in place until implementation level planning could be completed, and additional permit systems may be considered during future implementation level plans. See Appendix E. Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
9287-3	Vaughn Hadenfeldt		Recreation should continue with more control of visitation to popular archaeological sites. Many other sites such as the Citadel could benefit from the measured visitor attendance plan demonstrated at the Moon House site.	REC02-Visitation and Visitor Experience, ALT05-Alternative E	The preservation of Monument objects, including cultural sites, is an essential part of the RMP planning process for BENM. The RMP/EIS considers a range of management for the protection of those objects from recreation-related impacts. Under all action alternatives, "Agencies would collaborate with the BEC to identify sites where recreational visitation may be causing an impact and address those impacts, including educating recreational visitors about Indigenous descendant community connections to BENM cultural resources and etiquette to avoid or limit impacts to cultural resources, and, where necessary, controlling and/or limiting recreational visitation" (Alternatives for Recreation and Visitor Services of the RMP/EIS).
14995-1	Jeffrey Allen		The destruction since that time has been immeasurable despite honorable efforts by the BLM and Forest Service. Places where I camped in the 70s and 80s have been destroyed by trailers of ATV's enlarging the camp sites and turning the forest litter to dust. I would like maximum control over usage of this vital area with continued controlled access that is reasonable and enforced if you are required to get a permit .or if you leave designated trails and roads.	REC02-Visitation and Visitor Experience, ALT07-Modification of Existing Alternatives	The Proposed Plan addresses areas with known dispersed camping impacts and directs implementation-level plans that will include solutions like designating campgrounds, limiting camping to designated sites, creation of permit systems, and rehabilitating inappropriate campsites. No areas of BENM are OHV-open.
16988-3	Andy Blair 1690 East 2000 South Driggs, 83422	The National Outdoor Leadership School (NOLS)	Leave No Trace Education: Continue to expand educational initiatives focused on Leave No Trace principles to minimize human impact on the environment. The Visit with Respect video is a great example of a tool to educate visitors prior to coming to BENM. Since the onset of the pandemic, NOLS has appreciated the opportunity to share this video with our instructors during their briefings rather than visit the Kane Gulch Ranger Station on the first day of our courses before noon. The first day of our courses are quite busy. Our staff and students are better able to absorb the valuable message of Visit With Respect prior to the start of the course than in the middle of a long, busy day. We urge the planning team to continue this practice of permitting remote trainings for educational groups such as NOLS to increase student retention and outcomes. We believe this is also helpful to the rangers at Kane Gulch who often patrol in the afternoons and frees them up from having to wait for our courses to arrive. NOLS is a founding member of Leave No Trace (LNT). Students are taught, practice, and evaluated on their LNT practices on a daily basis on our courses.	REC02-Visitation and Visitor Experience, ALT07-Modification of Existing Alternatives	An identified goal in Recreation Use and Visitor Services is "In collaboration with the BEC, provide for visitor services, including interpretation, information, and education. Emphasize and educate visitors on Leave No Trace and Visit with Respect practices for all recreation activities throughout the Monument." Specific delivery methods will be developed during implementation-level planning.
17617-20	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	Alternative E should include Sand Island Upper and Lower Panels, and Cave Towers. Sand Island is one of the most appropriate sites for the development of visitor services. Sand Island has two campgrounds, an active boat ramp (13k15k people float the San Juan River yearly), currently in process of constructing the only fully ADA accessible trail in BENM, connected to the Bluff River Trail, 3 miles from the town of Bluff, and sites along HWY 191. Cave Towers is currently on SITLA property under a management agreement with BLM. The site is close to Highway 95 and near House on Fire and Mule Canyon Roadside Village. The site has had visitor impact mitigation work including restoration work on the 11 standing towers, extensive fencing, new signage, and new trails. across the road from House on Fire and Mule Canyon Roadside Village	REC02-Visitation and Visitor Experience, ALT07-Modification of Existing Alternatives	Sand Island is considered as a Public Use Developed site under the Proposed Plan, See Alternatives for Cultural Resources in Cultural Resources, for the management actions for public use sites. The agencies could consider additional sites to add to the list of public use sites during implementation, such as Cave Towers if acquired in collaboration with the BEC.
17617-6	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	The MMP should address vandalism and looting to avoid further damage to the natural and cultural sites. Education, enforcement and social pressure can be valuable tools employed in solving this legacy issue. BEP currently manages a reward account to support the BLM and USFS in preventing and capturing those engaging in illegal looting or vandalism within BENM. The MMP should incorporate this tactic and other tactics from collaborating organizations to address this issue. Related to this, the MMP should require assessment with the BEC of existing availability and impact of visitor-created parking and driving routes. The creation of expedient roads in undeveloped areas also creates access routes for looters, who intentionally use these routes to reach their target sites because they arent mapped or regulated by land agencies and, thus, arent often monitored by law enforcement.	REC02-Visitation and Visitor Experience, ALT07-Modification of Existing Alternatives	The Proposed Plan provides for the proper care and management of cultural resources. The protections include education, limitations on visitation, limitations on motorized access, signage, and stabilization. The adaptive management provisions included would allow the agencies to restrict public access to specific sites through further implementation-level planning, should those restrictions be determined necessary to provide for the proper care and management of Monument objects and values. See Cross-Cultural Education and Outreach for management actions related to incorporation of Traditional Indigenous Knowledge to support the agencies goals for better educating visitors about respectful visitation. Enforcement of all applicable laws and regulations regarding looting and vandalism of cultural resources, and consultation with American Indian Tribes in the enforcement of those laws, do not require a plan decision. The agencies regulations and policies prohibit the public from creating additional roads and trails. The BLM and USDA Forest Service will continue to consult with American Indian Tribes in the enforcement of applicable laws against looting and vandalism of cultural resources. The proclamations require the agencies to complete a travel and transportation management plan for BENM. The Travel and Transportation Management, provides guidance on this future implementation plan. The agencies will

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					consider specific routes and their associated impacts during planning for Travel and Transportation Management.
17617-8	Joe Neuhof PO Box 338 Bluff, 84512	Bears Ears Partnership	Promote education and enforcement to keep domesticated dogs from cultural sites. Domesticated dogs are technically invasive species in North American wilderness areas, and damages they can do to archaeological sites include digging, attracting other wildlife by spilling food or leaving their scents in or around sites, urinating or defecating in or around sites, and impacting the environment through noise pollution (through barking, whining, and howling). Despite the fact that all the major drainages of Grand Gulch and Slickhorn Canyon are off-limits to dogs, visitors have been known to bring dogs into Grand Gulch during the off-season on the assumption that they are less likely to get caught. Pets should be prohibited from entering all archaeological sites in BENM. Restrictions should not include language limiting enforcement (for example: Pets are not allowed in cultural sites where signed.). The BLM and USFS should incorporate ways to educate visitors about this rule in the MMP. Additionally, the MMP should develop some means by which to enforce this rule even in the off-season to protect the integrity of the cultural sites.	REC02-Visitation and Visitor Experience, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, "pets are prohibited in or at any alcoves, rock writing sites, or archaeological sites" and are prohibited from some Management Areas and Sub Areas (see Appendix E). Supplementary rules will be written subsequent to the ROD.
18275-6	Jamie Ervin	Outdoor Alliance	The Final EIS should include a clearer description of proposed permit systems under each alternative, including more detail about how permit systems will be developed and implemented with robust public input. For all recreational activities, we request that the Final RMP ensure that permit systems are applied only where necessary to protect BENM objects or the quality of the visitor experience. In some cases, both the cost and complexity of permit systems can pose a barrier for low income or marginalized communities to participate in recreational activities on public lands. The Final EIS should acknowledge this equity concern, and articulate how new permit systems can avoid creating unnecessary or inequitable barriers to public lands access.	REC02-Visitation and Visitor Experience, ALT07-Modification of Existing Alternatives	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Permits would be used as needed for the purpose of regulating recreational activity to protect Monument objects and may be used as a means of educating visitors or commercial guides/outfitters.
8-3	John Beaver 715 Rhode Island Street Helena, 59601		I would not limit the number of permits to the Fish/Owl loop, and not because it isn't already over-crowded, but because I think it's a good way to consolidate use in an area with relatively few, delicate cultural resources (as least as far as I know). Similarly, I'd keep access to Moon House about the same. My basic point here, is that these areas, while spectacular, are already overused, might as well keep people going in the same places in the hopes they don't spread out too much.	REC02-Visitation and Visitor Experience, ALT07-Modification of Existing Alternatives	The number of permits would be addressed in RAMPs that would analyze potential impacts on a variety of resources including but not limited to cultural, fish and wildlife, and recreation, in order to provide recreation management direction for specific areas of the Monument.
8999-7		International Mountain Bicycling Association	Demand for recreational access is the greatest resource we have for conservation. Specifically, recreational access, such as mountain biking trails, can contribute to the BLMs goals for protecting the BENM landscapes in several ways: Stewardship and Education: Mountain biking trails can serve as educational tools, providing opportunities for interpretive signage, guided tours, and organized events. These initiatives can raise awareness about the importance of environmental conservation, promote responsible outdoor practices, and educate visitors about the ecosystems and wildlife they encounter. By fostering a sense of stewardship, public access encourages individuals to actively contribute to the protection of the environment.	REC02-Visitation and Visitor Experience, ALT07-Modification of Existing Alternatives	The agencies' underlying purpose and need is to provide a framework, including goals, objectives, and management direction, to guide the management of BENM consistent with the protection of BENM objects and other applicable laws, regulations, and policies. Recreation, while identified as a resource that contributes to the social and economic well-being of the area's modern communities in Proclamation 10285, is specifically excluded from consideration as a BENM object to be protected. The Proposed Plan uses a management framework that employs landscape level Zones and specific Management Areas and Sub Areas to manage for specific recreational uses while prioritizing protection of BENM objects. See Appendix E. Under the Proposed Plan, mountain biking would be allowed on existing designated mechanized trails as well as all designated OHV routes.
10626-13	Debra Van Putten		The data collected on the type and length of visitor use of Bears Ears has not collected in a manner to represent all visitors equally. As I have extensively driven around Bears Ears the past two weeks, I have observed that sign in sheets collecting this data are only located directly outside of trailheads for walking trails, with one exception, on Butler Wash at the beginning of a number of foot trails. Most of the sign in sheets do not have an option for sightseeing by car. There is no sign in sheet at popular off-roading locations such as Snow Flat Road, Arch Canyon, Comb Wash/Arch Canyon Campground, or Elk Ridge Road, thereby providing the impression that there are far fewer using the established roads for sightseeing and undervaluing that community. There are no sign in sheets for hunters. At the Comb Wash/Arch Canyon campground over two weeks, I would estimate that I saw between 150-200 people camping, horseback riding or entering to drive Comb Ridge. I saw about a dozen off-roading on Snow Flat Road.	REC02-Visitation and Visitor Experience, DATA02-Inadequate Methodologies	Recreation data are collected from a variety of sources, including vehicle and infrared trail counters, comparison to UDOT and NPS data, visitor use monitoring (USDA Forest Service), Government Performance Review Act (GPRA) survey (BLM), intensive outcome focused management surveys, visitor registers and staff observations.
10626-7	Debra Van Putten		The EIS has zero documentation in the voluminous appendices of trash, degradation or misuse. If there was a serious problem I would expect to see pictures, logs of tons of trash removed, hours or monetary expenditures to repair any such damage.	REC02-Visitation and Visitor Experience, DATA02-Inadequate Methodologies	Documentation of past monitoring and data collection related to trash, degradation, or misuse of a particular site or environmental resource is documented in agency Patrol Reports. These data are outside of the scope of this document.
19019-4	D Schier		I've spoken to several BLM employees who asserted that the mesa top was being trashed by people camping in dispersed sites. I respectfully disagree. When I camp on Cedar Mesa, I consistently find the campsites clean and well cared for. But I'm concerned that the BLM and USFS may try to restrict camping to areas (campgrounds) that they spend taxpayer money to develop. The BLM is talking about developing several campgrounds. Be careful, because what you're proposing may not make sense. Imagine for example that camping is restricted to Cottonwood wash near Comb Ridge. Someone wishing to hike in the Slickrock Canyon area would need to camp near Comb Ridge, get up early in the morning and drive for several hours to the trailhead, hike for the day, then drive several hours back. To hike again in the same area would require repeating the schedule for several days, until the fuel supply was depleted to the point of needing to bum even more fuel driving out to Blanding to refuel. Contrast that to being able to camp/sleep in their vehicle at the trailhead for as	REC03	See the description of RAMPs in the Proposed Plan. Camping in cultural sites would be prohibited under all alternatives (see Alternatives for Cultural Resources in the Draft RMP/EIS) and the Proposed Plan focuses on educating visitor in order to reduce impacts. In addition, dispersed camping restrictions would be intended to reduce impacts on Monument objects, particularly in areas where disturbance from dispersed camping is occurring. The Draft RMP/EIS also distinguishes between developed and dispersed camping activity and includes a definition for "backpacking" (see the Glossary in Volume II of the Draft RMP/EIS). See Affected Environment and Environmental Consequences (woodcutting) for areas where collection of dead and down wood is restricted. Monitoring will be utilized to determine where adverse impacts from recreation are occurring on BENM. Such monitoring data will be used to inform adaptations in management of recreational resources to mitigate those impacts. For instance, under the Proposed Plan, group sizes and allocations will be

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			long as needed, burning zero fuel and emitting no emissions. Its hard to argue with the fact that the least impactful way to visit Cedar Mesa is a self- contained motorhome parked at the trailhead. Last but not least, anyone paying the least bit of attention knew that declaring Cedar Mesa a National Monument would cause visitation and impacts to increase.		reevaluated every three years in the Cedar Mesa Management Area (See Appendix E, Recreation and Appendix P, Monitoring)
889-55	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We are pleased to see that Alternative E and the other action alternatives largely allow existing dispersed camping to continue in all management zones, though we are concerned that alternative Es provisions regarding campsites near water could over time be used to close popular campsites that exist today. We are particularly concerned that many of the campsites in Comb Wash could be closed, as many of those are close to streams simply because that is where the flattest and most sheltered terrain is. We are glad to see that the management plan would not mandate the closure of these sites outright, and we urge the agencies to be judicious in applying the rules regarding campsites near water in the future and only close campsites that are causing clear impacts that cannot be mitigated in other ways.	REC03-Dispersed Recreation (where there are no formal recreational facilities)	Campsite designation and closure would considered in implementation level planning, and would be consistent with protection of Monument objects under Proclamation 10285.
10626-14	Debra Van Putten		In addition, much of the campground information is just plain wrong or apparently unverified. At page 3-404, the EIS purports that camping at BENM is jam packed on holiday and spring/fall weekends. I have been at the Comb Wash and Sand Island Campground this Memorial Day weekend and both have ample camping available. (Exhibit N) I have never had to access commercial camping in this area due to a lack of government camping, despite many visits. No one is driving outside of established boundaries due to overcrowding. The EIS fails to document the very large number of primitive (not dispersed) individual camping sites throughout Bears Ears along almost all of its major roads. These sites provide ample camping access over a range of weather conditions and to suit the landscape preferences of a wide range of people but their volume is not captured in the camping facilities data. For example, at page 3-406, Comb Wash Recreational site is listed as the only campsite in ShaJaa and on page 3-407, Cedar Mesa is shown as having no campsite. There are in fact probably more than a hundred primitive sites along Comb Wash, Butler Wash, Snow Flat and smaller formal roads in that area. Unmentioned in the EIS are the number of campsites along Elk Ridge Road which likely approaches 100 and I did not explore any side roads. All of these campsites are in the middle of areas where rangers have placed markers blocking off various routes of access, but have not been blocked off. All have nearly identical stone fire rings. It is not accurate to view them somehow not part of the existing, sanctioned Bears Ears Monument.	REC03-Dispersed Recreation (where there are no formal recreational facilities), DATA02-Inadequate Methodologies	The BLM and USDA Forest Service have inventoried dispersed and backcountry campsites in popular areas such as Valley of the Gods, Indian Creek, the Butler Wash Road, Elk Ridge Road and Grand Gulch. The agencies have documented instances of overcrowding in standardized patrol monitoring data. Additional sources of input regarding overcrowding include reports from partner organizations such as Bears Ears Partnership and Friends of Indian Creek and outcome focused management surveys. The campsite availability/use analysis is based on the best available data at the time the RMP/EIS was drafted. Under implementation-level planning, the agencies may work to inventory additional areas and, in some cases, designate dispersed camping.
10626-15	Debra Van Putten		The EIS fails to recognize one of the prime values of dispersed camping (as distinct to primitive no facilities), which is to support socially driven RV camping. Often groups of RVers (often family) will meet over a period of a week or two to explore an area, with various members coming and leaving. Parking in larger, informal dispersed sites that can contain a decent number of vehicles allows everyone to socialize collectively and to organize activities and food. Although popular, this use is not very compatible with organized, discrete campsites because the groups tend to be noisier and would be a distraction to the individual campers seeking solace.	REC03-Dispersed Recreation (where there are no formal recreational facilities), DATA02-Inadequate Methodologies	The agencies are aware of dispersed camping as a popular recreational use within BENM and have included management actions for dispersed camping activity in the Proposed Plan.
12746-7	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC	The Proposals SRMA and EMRA designated are often provide little to no specific guidance about secondary or indirect usages and related activities necessary to achieve the goals. As an example, dispersed camping is consistently accessed with motor vehicles, regardless of whether camping is with a tent or similar infrastructure. Most dispersed campers use a trailer to camp, and this means motor vehicle access must be provided in some manner, as we are sure the planners are aware of, management of dispersed camping has proven to be problematic throughout the region. Previous SRMA designations addressed these indirect factors by providing distances from roads where people could camp, requiring parking and other camping related infrastructure. We are unable to identify any management designation in the SRMA in the Proposal that would allow for the development of even basic infrastructure to support designated dispersed camping like fire rings. Basic guidance on how far dispersed camping would be allowed from roads, kiosk development, trash removal and other things commonly associated with dispersed camping simply are not addressed in the Proposal despite these issues being addressed previously.	REC03-Dispersed Recreation (where there are no formal recreational facilities), DATA01-Analysis Methods and Data	Such guidance and further management detail would be addressed in subsequent implementation level plans, which might include Travel Planning or a Recreation Area Management Plans.
14119-3	Jacques Hadler 125 E Center Moab, UT 84532	Grand County Commission	We hope that regulated dispersed camping continues to be allowed in areas that are fairly remote and not subject to large visitation. Promoting Leave No Trace ethics throughout the Monument as they relate to dispersed camping as a means to mitigate the impacts of this activity is of great importance	REC03-Dispersed Recreation (where there are no formal recreational facilities)	Under the Proposed Plan, the agencies would work with BEC to identify areas available and unavailable for dispersed camping and to promote Leave No Trace and Visit with Respect outdoor ethics. In some Management Areas, campsites would be designated (see Recreation Appendix).
15724-3	Rob Dillon 84532		Dispersed camping should continue, ideally in designated sites that meet sensible water, wildlife, and cultural-resource protection standards, as per Alternatives B and C. The Bridger Jack camping, for example, is an appropriate model. Not everyone wants, or can afford, the amenities that accompany campgrounds. The dispersed camping experience has brought a heightened appreciation for the beauty of the BENM to countless visitors, and we would be foolish to cut off this stream of potential Monument supporters.	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT07-Modification of Existing Alternatives	Under all alternatives, dispersed camping opportunities would be provided in BENM.

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1659-2	Eve Tallman UT		The Alternative E zone map for Indian Creek does not adequately reflect actual conditions. The stated proposal that Outback and Remote Zones shall not allow any new developed recreational facilities (page 2-108) precludes any development of needed campgrounds or vault toilets in the Indian Creek corridor. Furthermore, I do not agree that the vast majority of acreage on the north/east side of the highway in Indian Creek reflects the stated standard for Remote areas. It is a historically heavily-grazed area, is not a transitional area between elevations and is within view or audible distance from the highway. While heavy development of the area is not desirable, it is inappropriate to suggest this area possesses wilderness characteristics of the proposed Remote Zone. This is a very popular area and hosts the majority of visitation to the Monument. Zoning should adequately address future needs for infrastructure such as campgrounds, parking areas, vault toilets, and interpretive sites. I gather the concept of the Zone map is experimental and, while well-intentioned, traditional BLM and USFS management area designations are well-understood, easier to administer and more straightforward.	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT05-Alternative E	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details). The majority of the area on the north/east side of SR 211 mapped within the Remote Zone in the preferred alternative has been recategorized as Outback Zone under the Proposed Plan. This would allow for the development of recreational infrastructure to mitigate impacts. An exception is the area around Harts Draw, which is within the Remote Zone under the Proposed Plan.
1667-3	Molly Malone		Continuing on camping, page 2-103: Dispersed camping: -No dispersed camping would be allowing [sic] within 0.25 mile of surface water, unless in an existing or designated campsite or area. -No dispersed camping would be allowed within 0.25 mile of a developed campground. -The agencies, working collaboratively with the BEC, would designate campsites and areas to help guide and focus visitors to appropriate places -The agencies, working collaboratively with the BEC, would remove and reclaim existing campsites and areas, as necessary, to protect Monument objects, including cultural resources, wildlife, and water resources. This collectively shuts down all dispersed camping in the Indian Creek corridor. That is a huge problem- many folks camp here OUTSIDE of designated sites. People will not stop coming and what is the benefit of closing these long established dispersed sites? Are additional campsites being proposed? The areas established campsites are already at capacity nearly full time during peak season. Dispersed camping is one of the greatest experiences in Indian Creek. Getting rid of dispersed camping is a heartbreaking development that will deprive future generations of experiencing and enjoying camping in the wild, unencumbered by others, under a beautifully dark sky.	REC03-Dispersed Recreation (where there are no formal recreational facilities)	Under the Proposed Plan, no dispersed camping would be allowing within 0.25 mile of surface water, unless in an existing or designated campsite or area. Because camping would be allowed in existing sites, this would not restrict all dispersed camping in the Indian Creek area.
1689-5	Ralph Ferrara UT		Dispersed camping would be restricted in alternatives D and E, ostensibly resulting in less visitation. I disagree that fewer dispersed camping opportunities will result in fewer visitors. The extremely heavy impacts of dispersed camping in the areas surrounding Moab are solid evidence that closing areas to dispersed camping simply relocates the activity to the next available site, thereby perpetuating the damage. The Indian Creek corridor is the busiest area of the Monument, by far. Most visitors spend the night. I recall that, long ago when the Super Bowl and Creek Pasture sites were being developed, there was an understanding that rock climbers would stay in the developed sites (with badly needed vault toilets) if the cost was reasonable. At the time, \$5.00 per night was discussed. It is my impression that the current rate of \$20.00 per night is too expensive and a lower rate should be considered. The goal is to protect the undeveloped areas, and expanding and accommodating visitors in developed sites will help to attain this goal.	REC03-Dispersed Recreation (where there are no formal recreational facilities), REC02-Visitation and Visitor Experience	Any changes in dispersed camping management would have the intent of protecting Monument objects. The cost of campground fees is outside of the scope of this RMP planning effort and would be addressed in an implementation level plan such as a Business Plan or RAMP.
17617-9	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	Establish plans in collaboration with the BEC to limit impacts of dispersed camping, not dispersed camping locations. The MMP should have strong provisions to protect cultural resources from adverse impacts due to camping and campfires. Camping in alcoves and archaeological sites should be prohibited. In the Bears Ears area, an architectural site tucked into a low alcove in the White Canyon subregion was utilized as a camping site by unknown users during the spring of 2020 while most people including agency personnel were quarantined by the Covid-19 pandemic. The damage was discovered by archaeologist and long-time Bears Ears hiker Aaron OBrien, who reported them to the BLM at the time. One visitor campfire in an alcove can change the archaeological record of a site, such as the case of the Iceberg Granary in Glen Canyon Recreation Area, thus permanently damaging a cultural site. Regulations should go above and beyond stating that camping is prohibited in alcoves where signed; instead, camping should be prohibited in all alcoves and near all cultural sites. We are concerned that the MMP does not analyze the impacts of a dead and down collection policy. This can cause direct impacts to cultural resources, like when historic hogans have been torn down in the Comb Ridge/Butler Wash area for use as firewood. We request that an analysis be conducted as part of a final MMP. The history of dispersed, primitive backcountry camping in BENM should be preserved in the MMP. However, distinctions should be established in the MMP and subsequent implementation level planning between front and backcountry camping, and ways to minimize impacts on the landscape from both.	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT07-Modification of Existing Alternatives	See the description of RAMPs in the Proposed Plan. Camping in cultural sites would be prohibited under all alternatives (see section Management Actions Common to All Alternatives in Recreation and Visitor Services. of the RMP/EIS) and the Proposed Plan focuses on educating visitor in order to reduce impacts. In addition, dispersed camping restrictions would be intended to reduce impacts on Monument objects, particularly in areas where disturbance from dispersed camping is occurring. The RMP/EIS also distinguishes between developed and dispersed camping activity and includes a definition for "backpacking" (see the Glossary in Volume II of the Draft RMP/EIS). See Chapter 2 for areas where collection of dead and down wood is restricted.
18852-3	Lucia Christensen 2828 Silverplume Dr, #U4 Fort Collins, CO 80526		Anyone who spends time in the Indian Creek area can see that new dispersed campsites pop up every year. However, there is a massive demand for camping in the area. Rather than entirely eliminating these campsites, I would suggest that Backcountry dispersed sites become designated campsites (i.e. first come first served but camping is only allowed in designated sites). I DO NOT think that any permitting should be done via recreation.gov given the poor cell phone receptions throughout the entire corridor. Another option would be to expand the Creek Pasture, Hamburger Rock & Superbowl campgrounds or add an addition campground.	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT07-Modification of Existing Alternatives	Under the Proposed Plan, new campgrounds and designated dispersed sites may be developed in Indian Creek. Methods, such as use of Recreation.gov, would be decided at that time.

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18965-17	Simone Griffin	BlueRibbon Coalition	We have already seen an increase in closing dispersed camping across public lands across the nation. The desire and need for outdoor recreation has grown tremendously the past few years with no end in sight. The BLM/USFS should recognize the value that connecting with nature through dispersed camping and recreation brings. Restricting this form of recreation and limiting areas of use will only increase impact. We recommend adopting dispersed camping standards within this plan to require public input for any dispersed camping closures. Allowing dispersed camping should also be seen as a management tool for offsetting the socioeconomic inequities that are taking root as ultra-wealthy residents displace lower- and middle-income individuals and families from accessing monument areas. We are concerned that closing dispersed camping options will eventually lead to reservation systems which ultimately give advantage to upper-class users as oftentimes marginalized groups do not have the luxury of making reservations that far in advance. 1 Another issue is those who make reservations and dont show up, it takes away opportunities to utilize public lands from someone who otherwise would have used the camping spot. The USFS should look at data of reservation system implementations to see how they affect various user groups before implementing any type of reservation system. According to a study on reservation systems in National Parks, Results suggest that for each of the five campgrounds, those campers camping in sites that require reservations came from areas with higher median household incomes, on average. 2 The study also concludes that the online reservation systems cater to primarily white users. The USFS and BLM should stop their proposals to limit free, primitive and dispersed camping as more and more research is showing that is discriminatory.	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT07-Modification of Existing Alternatives	The Recreation Use and Visitor Services section in The Proposed Plan allows for dispersed camping in existing sites. Future designation of dispersed camping areas will be made through an implementation plan or on a case-by-case basis. The Proposed Plan does not require a reservation system for dispersed camping. The agencies are not considering such a system at this time for dispersed camping.
1943-3	Andrew Slade		Alternative E identifies the largest amount of land for remote and outback usage zones. My backpacking experience in Grand Gulch taught me that the further you get from the trailhead, the richer and more diverse the backcountry experience becomes. It is critical to maintain these remote backcountry experience objects.	REC03-Dispersed Recreation (where there are no formal recreational facilities)	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects.
3106-1	Caroline Reuter 1439 Crescent Rd, apt. 1105 Park City, UT 84060Dierk Reuter		I am private non-commercial recreational user of these airstrips for camping and hiking. As a former boy scout leader I am proponent of Leave no Trace. I really don't understand why cutting off access to well established airstrips for camping help anyone. Removing the airstrips removes camping and hiking access and increases the impact on other camp sites that are acessable by roads. These roads need to be maintained.	REC03-Dispersed Recreation (where there are no formal recreational facilities), TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and the Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Impacts of aircraft on the natural environment are discussed in Backcountry airstrip use and impacts are discussed in throughout the RMP/EIS.
7416-1	Melissa Rigg PO Box 415 Bluff, UT 84512		I support the development of campgrounds and a permit system for dispersed camping rather than the free for all that is out their right now.	REC03-Dispersed Recreation (where there are no formal recreational facilities)	Under the Proposed Plan, camping would be limited to designated dispersed or backcountry sites in selected Management Areas (see Recreation Appendix N). Designation or campground development would occur in implementation level planning.
889-54	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	By far the most popular activity in the Bears Ears National Monument among all user groups is dispersed camping. If there is one commonality between off-roaders, hikers, mountain bikers, rock climbers, river rafters, and horseback riders, it is that all of them enjoy dispersed camping during their trips to the monument. Because the monument is so remote and far from towns with hotels and other accommodations, camping is the best and only lodging option for most visitors to the region. The existing Bears Ears management plans and the Monticello Field Office RMP and Manti-La Sal National Forest management plan allow dispersed camping along existing access routes. We strongly oppose significant restrictions on dispersed camping in the monument and believe the existing regulations are reasonable and sufficient. We also oppose any effort to restrict camping to developed campgrounds. For people who desire both the low cost and freedom of dispersed camping, paid campgrounds simply do not provide an acceptable camping experience. As more people flock to Bears Ears as the area becomes more well-known, it is critical that the agencies continue to allow dispersed camping throughout the monument. We therefore request that the current rules regarding dispersed camping remain in place and we oppose any significant additional restrictions or prohibitions on dispersed camping in the monument.	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT07-Modification of Existing Alternatives	The Proposed Plan in the Recreation Use and Visitor Services section allows for dispersed camping in existing sites. Future designation of dispersed camping areas will be made through an implementation plan or on a case-by-case basis. The Proposed Plan does not require a reservation system for dispersed camping. The agencies are not considering such a system at this time for dispersed camping. Under the Proposed Plan, dispersed camping could be limited in certain areas (see Appendix H) but would be allowed elsewhere in the BENM.
908-2	Lawrence Stoker Las Vegas, NV		Continuing on camping, page 2-103 states: Dispersed camping: -No dispersed camping would be allowing [sic] within 0.25 mile of surface water, unless in an existing or designated campsite or area. - No dispersed camping would be allowed within 0.25 mile of a developed campground. -The agencies, working collaboratively with the BEC, would designate campsites and areas to help guide and focus visitors to appropriate places -The agencies, working collaboratively with the BEC, would remove and reclaim existing campsites and areas, as necessary, to protect Monument objects, including cultural resources, wildlife, and water resources. This collectively shuts down all dispersed camping in the Indian Creek corridor. Was this intentional? What other provisions will be made prior to incorporation of the Management Plan? What are the BECs interests in shutting down camping? Are additional campsites being proposed? The areas established campsites are already at capacity nearly full time during peak season. Dispersed camping has been one of the greatest experiences in Indian Creek. Getting rid of dispersed camping is a heartbreaking development that will deprive future generations	REC03-Dispersed Recreation (where there are no formal recreational facilities)	Under the Proposed Plan, new campgrounds and designated dispersed sites may be developed in Indian Creek. Methods, such as use of Recreation.gov, would be decided at that time.

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			of experiencing and enjoying camping in the wild, unencumbered by others, under a beautifully dark sky.		
908-6	Lawrence Stoker Las Vegas, NV		Who is the BEC accountable do? Are there any time frames that the BEC must respond to requests by? If a route request is not answered in an appropriate time frame (say 30 days), will the request be considered automatically accepted or rejected? What about appeals? How are BEC members chosen? Does the Management Plan override existing federal and state laws for protection? What about protection of the free exploring of areas and experiencing in the form of rock climbing and route development?	REC03-Dispersed Recreation (where there are no formal recreational facilities)	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input. While Proclamation 10285 identifies recreation as an important use within the BENM it is specifically excluded from consideration as an object to be protected. For more information about the Bears Ears Commission, please see Chapter 4 of the RMP/EIS. For more information about compliance with other policies and plans, please see Chapter 1. of the RMP/EIS. The process of electing BEC members is outside of the purview of the agencies.
9199-2	Linda Stitzer 143 Limestone Rdg SEDONA, AZ 86336		1) Dispersed camping - Alternative E does not adequately address the impact of dispersed camping on riparian and water resources. Alternative C seems somewhat more protective. Some dispersed camping areas, like Comb Ridge, are heavily degraded, trees are dying and there is significant erosion and habitat loss. Better management of these areas and restoration to control these impacts is needed.	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT05-Alternative E	The management under Alternative C was considered. See Section Recreation and Visitor Services of the Proposed Plan.
9255-13	Keith Alleman		Also, I want to encourage management agencies to try, to the maximum extent practicable, to segregate livestock grazing away from areas of developed campgrounds or areas known to be popular for dispersed camping. Cow poop at a tent pad really degrades the camping experience. [NB: This concern for developed campgrounds is mentioned at 2.4.22.2; I would just add popular backcountry camping areas to that consideration.]	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT07-Modification of Existing Alternatives, GRAZ01-General	Under the Proposed Plan, "Grazing is excluded from developed recreation facilities, which includes developed campgrounds, developed trailheads, and cultural sites that are Public Use (Developed)" (Located in Recreation Use and Visitor Services under Impacts Common to All Alternatives of the RMP/EIS).
9346-2	Levi Tenen		My sense is that Alt E balances these considerations well. The only potential caveat is that I also value overland, off-trail bushwhacking, when done responsibly (i.e. without busting crust). I encourage the Coalition and BLM/FS to continue to protect opportunities for that.	REC03-Dispersed Recreation (where there are no formal recreational facilities), ALT05-Alternative E	The Proposed Plan does not prohibit off trail hiking anywhere in the Monument. See Travel and Transportation Management in the Proposed Plan. Visitors are encouraged to stay on existing routes to protect unseen Monument objects and limit the creation of social trails which may lead people unfamiliar with the area to become lost.
8587-1	Lynn Preston		I don't support designated campsites for backpackers due to the unpredictability of water availability.	REC04-Developed Recreation Sites	Archeologists have documented impacts to archeological sites caused by backpacking campsites in popular areas such as Grand Gulch, and any amount of camping within a MSO PAC during breeding season could be detrimental to the species. Creating designated campsites in the Management Areas and Sub-Areas specified in Appendix E allows for recreational use while protecting BENM objects.
908-3	Lawrence Stoker Las Vegas, NV		Page 2-108 states: "Seasonal closures of these facilities would be considered to allow for resource rest and/or traditional uses or ceremonies. These seasonal closures would be identified in collaboration with the BEC and Tribal Nations." Are these facility closures or are they for the entire region? What is the size and area? What is the length time? Why would the entire area be closed for an unspecified amount of time to other tax paying citizens?	REC04-Developed Recreation Sites	Terrestrial Habitat and Vegetation Resilience and Conservation. Under the Proposed Plan, the need for seasonal closures would be determined in collaboration with the BEC, and these closures may relate to the protection of any BENM objects. The Recreation and Visitor Services section of the Proposed Plan provides some additional information these closures, and closures are discussed in the analysis in Appendix N. Resource rest could include the raptor nesting closures referred to in the comment, as well as rest that occurs during the winter and summer. Resource rest would be implemented in coordinated with the BEC. Various options for resource rest and closures would be analyzed as a part of implementation level planning.
9255-2	Keith Alleman		To the extent practicable, visitors to the BENM who are recreating responsibly should be able to do so anonymously. Part of the tradeoff of using our public lands should not be that your identity and travel habits have to be captured by some government or private sector database. As an example of this principle in practice, some campgrounds, or some sites within campgrounds, should not require a prior reservation made online and held by a credit card. Someone should be able to pay for a camp site by putting cash in an envelope and sliding it into a pipe.	REC04-Developed Recreation Sites	The agencies will consider a number of fee options for fee activities during implementation-level planning.
12732-3	Patricia Becnel		2. I favor more designated camping sites to eliminate harm to backcountry areas- for environmental and cultural reasons.	REC04-Developed Recreation Sites, ALT05-Alternative E	Under the Proposed Plan, in the Recreation and Visitor Use section, agencies would inventory and monitor dispersed camping sites and areas, work to identify areas that are available to dispersed camping and areas that are limited to designated sites. Campsites would be designated to help guide and focus visitors to appropriate places and to protect BENM objects.
18610-8	Kate Mabry		Develop interpretive signage/plaques and interpretive programs on-site and in outreach programs at schools, organizations, etc. to inform and educate the public especially the Native American history of Bears Ears National Monument.	REC04-Developed Recreation Sites, ALT05-Alternative E	Interpretive materials will be designed in coordination with BEC and other Tribal Nations during implementation of this RMP. Please see Cross-Cultural Education and Outreach, for more detail.
1928-2	Robert Pazik		Support continued recreation by the public in the Monument, utilizing Recreation Management Zones (RMZs), an effective method used in Grand Staircase Escalante National Monument and other public lands.	REC04-Developed Recreation Sites, ALT05-Alternative E	The Proposed Plan employs a zoned approach to recreation management.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
12832-10	Jason Keith 243 Aspen Avenue Moab, UT 84532	American Mountain Guides Association	AMGA supports the development of an implementation-level camping plan to assess camping needs and associated issues such as toilets and waste. We urge the Agencies and BEC to ensure that there are enough camping locations (both developed campgrounds and designated dispersed campsites) to accommodate demand and limit impacts from unmanaged camping. Any new camping fees should be commensurate with similar campgrounds in the area. This RMP should continue the effort to provide for a range of camping experiences throughout the BENM while clustering most of the camping at frontcountry locations to protect BENM objects and the undeveloped character of Indian Creek and the monument as a whole.	REC04-Developed Recreation Sites, ALT05-Alternative E, REC03-Dispersed Recreation (where there are no formal recreational facilities)	Recreation Area Management Plans (RAMPs) will be developed for Management Areas as part of implementation level planning and will consider issues such as designating campsites and the implementation of any fee programs. See Appendix E. A Business Plan, including additional public comment and Resource Advisory Committee (RAC) review, would be created for any fee increases.
17617-10	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	There are ways the BLM and USFS can plan for smart & strategic designated camping areas in previously disturbed areas to slow the proliferation of newly disturbed areas. One of the ways to address this issue is to consider different audiences or user groups. There is a need for continued free, dispersed camping in BENM No.10285 but there is also a need for designated camping (campgrounds or campsites) in highly visited areas, especially for car and RV camping, to limit the creation of new, disturbed areas. Concentrating car and RV camping to a few previously disturbed areas will respond to that need. Areas in Comb Wash, Lower Butler Wash, Grand Gulch/HWYs 261/95 and Valley of the Gods are areas that could be researched for more developed campsites.	REC04-Developed Recreation Sites, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, implementation-level Recreation Area Management Plan/Business Plan would be developed to manage recreation consistent with the proper care and management of Monument objects and values (see Appendix E for specific camping decisions for Management Areas). The implementation-level Recreation Area Management Plans/Business Plans will address camping consistent with Zone and Management Area Objectives.
18275-5	Jamie Ervin	Outdoor Alliance	Outdoor Alliance also recommends that Final RMP allow for additional recreation designations, such as SRMAs, to be included alongside or overlaid on the four landscape level management zones. These designated areas provide land managers with the ability to focus attention and resources on sustainable recreation in areas where high recreational use is anticipated. Given that the agencies anticipate that recreational use will increase in BENM, the Final RMP should allow for recreation-focused management in specific areas of all Zones. Alternative E already includes the Moon House RMZ and provides special recreation-focused management for the San Juan River.22 At a minimum, the Final RMP should either carry forward the Indian Creek SRMA or include special management provisions for recreation in Indian Creek.	REC04-Developed Recreation Sites, ALT07-Modification of Existing Alternatives	The Proposed Plan employs a zoned approach to protect BENM objects on a landscape level. The Proposed Plan also includes Management Areas in those places where additional management is needed for specific recreational activities or to address complex recreation challenges. This includes Indian Creek, San Juan River, Cedar Mesa, and other areas to maintain recreation activities consistent with the protection of BENM objects (see Appendix E for more details).
18275-7	Jamie Ervin	Outdoor Alliance	We recommend that the Final RMP clearly describe the process for fixed anchor authorizations and include opportunities for climbers to contribute to this process being developed. As a component of this new authorization process, BLM should consider programmatic authorizations to address multiple routes within an individual climbing area or zone. We also recommend that the Final RMP establish an interim process prior to a formal authorization process being developed that would allow for land managers to authorize new climbing routes with fixed anchors consistent with the protection of monument objects.	REC04-Developed Recreation Sites, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, the agencies would work collaboratively with the BEC to determine whether new routes are appropriate for the protection of BENM objects. A programmatic program to authorize areas and/or individuals to bolt could be considered as part of a RAMP for the Indian Creek Management Area, which would be a process involving public input. Before the route approval process is established, routes will be reviewed on a case-by-case basis
1810-6	Isaac Lindstrom 287 4th Ave Salt Lake City, UT 84103		Additionally - more bathrooms are always a benefit to the land as I have seen the issues of people pooping wherever in places like Bryce Canyon National Park and Grand Staircase, so adding bathrooms to areas of high use for dispersed camping would be good. Another idea would be to have areas of "designated" dispersed camping similar to the Boundary Waters Wilderness Area in MN with toilets.	REC04-Developed Recreation Sites, REC03-Dispersed Recreation (where there are no formal recreational facilities)	Any new infrastructure would be analyzed through an implementation level RAMP or site-specific implementation level NEPA document to ensure that the proposal would not impact the objects of the Monument. These involve a public process. Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. Under all alternatives, there is a BMP to provide restroom facilities in areas of high use. Under the Proposed Plan, dispersed camping would be designated in several RMAs/MAs (Recreation and Visitor Services section in the Proposed Plan of the Draft RMP/EIS). Under the Proposed Plan, the agencies would work with BEC to identify areas available and unavailable for dispersed camping.
19019-3	D Schier		A few more notes. One of the biggest indicators of backcountry impact is group size. Yet permits by their very nature encourage, almost demand larger group sizes. I think frequently about my rafting friends who try for years to get a permit for the Grand Canyon, and max out the group size when they do. My California friends do the same with backcountry permits. We need smaller, less impactful groups, not larger, more impactful ones11 * Permits do the opposite. In that vein, I encourage BLM/USFS to restrict group size to no more than four. Yes, I understand that many people will simply split into two or more groups. That's fine. Impact is exponential, not linear. Two people have more than twice the impact of one. If you are requiring preregistration for permits, a group of 8 can try to get two permits for the same day, but by having to get two permits, it encourages smaller group sizes. With that in mind, I would support eliminating the permit requirement for soloists	REC05	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. The Draft RMP/EIS analyzes a range of general permit guidelines in the range of alternatives. Any permit systems required by the Proposed RMP/EIS would be further developed during implementation level planning. Group sizes and SRP thresholds are defined by zone in the Proposed Plan.
14119-1	Jacques Hadler 125 E Center Moab, UT 84532	Grand County Commission	In anticipation of increased visitation we hope that responsible local outfitting and guiding opportunities will continue as traditionally permitted. This both supports local economies and provides additional stewardship and land management resources.	REC05-Commercial, Competitive, and Organized Group Recreation	Under all alternatives, SRPs and SUPs would be used to manage allowed commercial uses and organized groups on BENM.
14539-3	Rebecca Gillis		2. Recreation Permitting Requirements: Clarification on permitting requirements for both private and commercial recreation across the four proposed zones is necessary. Specifics around group size limits, costs of permits, and whether day-use recreation activities will require permits would be highly beneficial.	REC05-Commercial, Competitive, and Organized Group Recreation	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.

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					The RMP/EIS analyzed a range of general permit guidelines in the range of alternatives. Any permit systems required by the Proposed RMP/EIS would be further developed during implementation level planning. Group sizes and SRP thresholds are defined by zone in the Proposed Plan.
17326-4	Ben Muhlestein		There are group size limitations mentioned for front country and passage areas, but none mentioned in the charts (2-82, plan E) for outback and remote regions. Considering that much of our favorite areas to camp are located in the outback region, there should be clarity on what is allowed or not allowed. The limits in the other areas, 25 or less, is not realistic for many families in our area. Family reunions for our family frequently and easily go over 25. With the importance to us of these areas, these group size restrictions are prohibitive to our traditions. Many religious groups also camp in the region (young men and young women groups) which would easily be precluded by a limit of 25.	REC05-Commercial, Competitive, and Organized Group Recreation	While the Zones establish group size thresholds for casual (non-permitted) use, current allocations and group sizes for commercial use would remain in place until implementation planning is completed. Please see the Recreation and Visitor Use section for more information on group size limits under the Proposed Plan.
18657-34	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	We are also concerned by the fact that some alternatives (including Alternative E) include harsh group size limits on almost all forms of recreation across the monument. Aside from the severe harm this would cause to long established events like Easter Jeep Safari and the Jeepers Jamboree (which currently use routes such as Chicken Corners, Lockhart Basin, Hotel Rock, and Arch Canyon), we believe that severely restricting group sizes unconstitutionally violates Americans right to freedom of assembly under the First Amendment. While the First Amendment permits some reasonable time, place, and manner restrictions on both expressive and non-expressive gatherings, such restrictions must generally satisfy strict scrutiny and be narrowly tailored to meet a compelling government interest. Radically restricting group sizes across the monument would not be narrowly tailored to meet any legitimate government interest, as what interest the government has in protecting the environment and visitor experiences could be met in other ways.	REC05-Commercial, Competitive, and Organized Group Recreation	The Proposed Plan complies with all applicable laws and regulations.
7958-6			With the increase in BENM visitation (2022: 600,173 annual visits), the BLM needs to run a more stringent and managed permit system. Issuing of permits should not just be based on certain factors such as numbers of people or commercial use. Under a permit system, tour operators and guides are given a set of compliance measures on the permit. If certain tours are allowed without permits, the BLM has no opportunity to ensure that tour groups don't cause resource damage such as not touching rock art panels, climbing on ruin walls, or eating lunch in archaeological sites.	REC05-Commercial, Competitive, and Organized Group Recreation	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC. Under all action alternatives, all SRP and SUP holders would be educated about the cultural history of BENM and visitor etiquette and BENM users about stewardship, interpretation, and education about cultural resources.
889-66	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We object to the thresholds for when special use permits are required under alternative E, listed on page 2-110 of the DEIS. Specifically we oppose the provisions requiring a special use permit for Car camping with more than five vehicles or more than 10 people and Non-mechanized/non-stock overnight with a group or event of more than 10 people, unless in a group site. These two thresholds requiring special use permits for groups over ten people are small enough they could potentially ensnare a single large family. While rare, I have personally known families with 10+ children, which would put a single family over the threshold to require a special use permit to visit the monument at all. Such families would likely have no idea they are required to submit to the lengthy and extensive bureaucratic process to obtain a special use permit to simply visit the monument like any other family, and could easily violate this provision by mistake. Many other smaller families could likewise be ensnared by it simply by visiting the monument with a few relatives or extended family members, such as adult children with their own spouses and children. The 50 person thresholds in alternative A are far more reasonable and would avoid unintentionally criminalizing large families visiting the monument.	REC05-Commercial, Competitive, and Organized Group Recreation	While the Zones establish group size thresholds for casual (non-permitted) use, current allocations and group sizes for commercial use would remain in place until implementation planning is completed. Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects.
889-67	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We also object to the two provisions requiring special use permits for Group events with the potential for user conflict, and Any individual use that might impact Monument objects. We believe these provisions are unconstitutionally vague as they give no effective notice of what specific behavior is covered by these thresholds. As discussed below, many anti-motorized activists object to any motorized use whatsoever on public lands and consider any presence of motor vehicles on or near routes potentially used by hikers to automatically constitute a user conflict. This first provision could therefore potentially be interpreted to require a special use permit for any motorized use of the monument at all, even if well below the group size limits discussed above, which are already excessive and would require permits for most organized off-road club rides. Similarly, given that the entire Bears Ears landscape is considered a monument object, along with other vague concepts like canyons, streams, plants, and animal habitat, any use of the monument at all, even by a single individual, could potentially impact Monument objects and therefore require a special use permit. These two provisions should therefore be removed from the final management plan as they are so nebulous and vague as to be utterly meaningless and unenforceable.	REC05-Commercial, Competitive, and Organized Group Recreation	Such provisions are consistent with SRP guidance (MS-2930, Recreation Permits and Fees). The Proposed Plan is consistent with applicable laws and regulations.
16988-5	Andy Blair 1690 East 2000 South Driggs, 83422	The National Outdoor Leadership School (NOLS)	Group Size Limits: Maintain group size limits at current levels for educational organizations. NOLS is a conservation oriented school that aims to develop our students into competent and conscientious backcountry travelers. NOLS is a 501(c)3 non-profit educational institution. For us to be able to convey our LNT and cultural sensitivity curriculum to our students, we need a group size limit that allows us to do this in an economically sustainable manner. A reduction in groups size limits for educational organizations would result in significant economic stress for our school, possibly resulting in a decrease or cessation of operations. NOLS is concerned that this would be a negative outcome for BENM. NOLS students spread the LNT ethics and cultural sensitivity that they learn on their	REC05-Commercial, Competitive, and Organized Group Recreation, ALT07-Modification of Existing Alternatives	While the Zones establish group size thresholds for casual (non-permitted) use, current allocations and group sizes for commercial use would remain in place until implementation planning is completed. While private group size thresholds are identified in the Proposed Plan for Management Zones, larger group sizes may be considered under an SRP.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			courses to friends and family and future students of their own. This directly serves the management goals outlined in Alternative E in the Draft RMP.		
17599-6	Byron Harvison 710 10th St, Suite 100 Golden, CO 80401	The American Alpine Club	Commercial Filming. Under Alternative E no commercial filming would be allowed. We believe that a wholesale prohibition to commercial filming on BENM could be a missed opportunity to promote the cultural, biological, and ecological relevance of the Monument, as well as amplifying best-practices through the media arts. The agencies should consider reviewing commercial project proposals in conjunction with the BEC through the existing film permitting system ²⁰ and consider those that may enhance and/or promote the image of BENM.	REC05-Commercial, Competitive, and Organized Group Recreation, ALT05-Alternative E	See changes to the Proposed Plan under the Lands and Realty. The agencies have adjust management actions for film permitting.
18657-61	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Special recreation permits for motorized events must continue to be allowed for all routes currently permitted for events. Chicken Corners, Lockhart Basin, and Hotel Rock are currently permitted for Easter Jeep Safari, while Arch Canyon is permitted for Jeep Jamborees and has been used for Jeep Safari in the past. These two events are extremely important to the motorized community, and it is critical that they continue to be allowed to use these routes.	REC05-Commercial, Competitive, and Organized Group Recreation, ALT06-Proposed, NEW	SRPs would still be used to manage different types of commercial uses, competitive events, and organized groups under all alternatives. SRPs and SUPs would be issued as a discretionary action. Under the preferred plan, commercial and organized motorized group SRPs would not be allowed in Arch Canyon (See Appendix E).
8425-2	Kate Autoue		Moving forward, I would suggest that a more conservative approach on permits is necessary in order to sustain the characteristics of wilderness. As I write, I sit in a camp at the confluence of Cherry Creek and Dark Canyon. On my hike here, I noticed many examples of human interference with the Natural world, barbed wire fences, new established fire rings, multiple trails that could be classified as "trammelled", and trail signs are a few examples. Wilderness is a place that can connect us humans to our most natural and primitive state in a manmade concept that resembles little human interference. However, with our over population of recreationalists in a specific area, we can see first hand the characteristics of wilderness being ripped apart, therefor ripping the core of human descent away. Considering a new permit approach to reduce large group access and allowing time for the natural state of our plants and wildlife to be reviewed would be very beneficial to the land we used to so harmoniously interact with.	REC05-Commercial, Competitive, and Organized Group Recreation, ALT07-Modification of Existing Alternatives	Recreational permit systems and fees would be developed as part of implementation level planning. Some fee schedules are set at the Departmental level, but most ISRP and RUP (camping) fees are determined through a Business Plan process, which involved public involvement and approval by a Recreation RAC.
10626-3	Debra Van Putten		The EIS does not address Bears Ears in the context of other recreational opportunities in the general Utah area. In this regard, Bears Ears is soon to be the last man standing in terms of easy to middling off road opportunities in southern Utah. Moab routes aimed at stock jeeps have been gutted. The San Rafael Swell will undoubtedly be gutted. Escalante is to be gutted. Bears Ears will be the last location with a rich network of off (dirt) roads to explore. Accordingly, its road network should not be limited or closed.	TRAVEL01-General, DATA02-Inadequate Methodologies,	The existing authorized travel network is described under the affected environment and analyzed under the No Action Alternative. Specific road designations (including open, limited, or closed) are implementation-level decisions that are not addressed at the planning level in the RMP/EIS. Implementation-level planning will be consistent with the management direction in the approved RMP and Presidential Proclamations 9558 and 10285.

Table U-23. Recreational Shooting

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17252-2	Dallas Safari Club Archery Trade Association National Shooting Sports Foundation Boone & Crockett Club Congressional Sportsmen's Foundation Delta Waterfowl Wild Turkey Federation National Rifle Association Rocky Mountain Elk Foundation Tom Allen 1959 Stone Canyon Court Grand Junction, CO 81507Association of Fish and Wildlife Agencies		The LUP/EIS ignores Section 4103 of the Dingell Act requiring closures for hunting, fishing and recreational shooting to be the smallest area for the least amount of time for public safety, administration or compliance with applicable laws. The LUP/EIS provides no justification for extending closures beyond what is currently in effect and how proposed closures in the alternatives (except Alternative A) are in compliance with this section of the Dingell Act.	DINGELL01-mentions Dingell Act	The agencies consulted with DWR and PLPCO in accordance with the Dingell Act for recreational shooting closures in BENM. Based on that consultation, as well as information in the EIS, the Proposed Plan would prohibit dispersed recreational shooting across the entire Monument for public safety, administration, and compliance with applicable laws, including FLPMA and the Antiquities Act. See Recreation Use and Visitor Services for a discussion of impacts to BENM objects from recreational shooting.
17573-83	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The DWR does not support any limitations on recreational shooting within the BENM, such as Alternative E, our preferred Alternatives are A or B (as it relates to recreational shooting). Additionally, the proposed closures found in the alternatives do not analyze how the alternative meets the standard of being the smallest area or least amount of time as required by the Dingle Act. The DWR, BLM, USFS, and PLPCO collaborated on developing Alternative B, and we support this alternative or alternatives that are less restrictive for recreational shooting. It should be noted in the RMP, that if any additional recreational shooting restrictions are needed, the DWR should be consulted as outlined in the 2019 Dingell Act.	DINGELL01-mentions Dingell Act, REC06-Shooting Sports/ Hunting/ Fishing	The agencies consulted with DWR and PLPCO in accordance with the Dingell Act for recreational shooting closures in BENM. Based on that consultation, as well as information in the EIS, the Proposed Plan would prohibit dispersed recreational shooting across the entire Monument for public safety, administration, and compliance with applicable laws, including FLPMA and the Antiquities Act. See Recreation Use and Visitor Services for a discussion of impacts to BENM objects from recreational shooting.

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18995-2	Tim Allen	National Rifle Association; National Shooting Sports Foundation; Boone & Crockett Club; Rocky Mountain Elk Foundation; Delta Waterfowl; Congressional Sportsmens Foundation; Association of Fish and Wildlife Agencies; Public Lands Foundation; Dallas Safari Club; Wild Turkey Federation; Archery Trade Association	The LUP/EIS ignores Section 4103 of the Dingell Act requiring closures for hunting, fishing and recreational shooting to be the smallest area for the least amount of time for public safety, administration or compliance with applicable laws. The LUP/EIS provides no justification for extending closures beyond what is currently in effect and how proposed closures in the alternatives (except Alternative A) are in compliance with this section of the Dingell Act. Further, the BLM appears to be creating new criteria for closing land to recreational shooting and importing to the Wilderness Act something for which there is no prohibition; that is, the discharge of firearms. Wholesale prohibition of recreational shooting on land with wilderness characteristics clearly exceeds the agency's discretionary authority under the Chevron Doctrine and the requirements of the Dingell Act cited above.	DINGELL01-mentions Dingell Act, SHOOT01-not in favor of shooting closures, DECIO7-Compliance with other laws and policies	The agencies consulted with DWR and PLPCO in accordance with the Dingell Act for recreational shooting closures in BENM. Based on that consultation, as well as information in the EIS, the Proposed Plan would prohibit dispersed recreational shooting across the entire Monument for public safety, administration, and compliance with applicable laws, including FLPMA and the Antiquities Act. See Recreation Use and Visitor Services for a discussion of impacts to BENM objects from recreational shooting.
19002-6	Maury Bergman bergmanmaury@gmail.com		I would like to comment on the clause about recreational shooting, however there is not a definition of what recreational shooting is. Therefore, how can an effective comment be made. Again, a supplement needs to be provided for further clarification.	REC06-Shooting Sports/Hunting/Fishing	Recreational shooting is prohibited in the BENM in the Proposed Plan. A definition of recreational shooting that the agencies coordination with the State on was added to the Proposed Plan.
19017-18	Sylvia Stubbs	San Juan County	p. 2-114 Recreational Shooting The prohibition of recreational shooting over vast landscapes as proposed in alternatives D and Eis unrealistic and unnecessary. Recreational shooting, while not a major use of these areas, is an important use enjoyed by many. Whether this is done by families teaching their children firearms safety and shooting skills or by sportsmen and sportswomen honing their shooting skills or just plain enjoying the use of firearms, this is a custom and lifestyle of local citizens as 5 well as the western way of life. We agree that recreational shooting is not appropriate in campgrounds, parking areas, trailheads and other locations as listed in Alternative B, but we think that the limited and sporadic occurrence of recreational shooting throughout most of the BEM would be acceptable and not likely to cause problems. Page 3-431 of Volume 1 states that there is minimal recreational shooting in the Monument so we don't see the need to prohibit such a limited activity. We do not support a ban of recreational shooting over vast areas. We recommend that recreational shooting be allowed over most of the Monument and prohibition of such shooting only be implemented if problems develop.	REC06; SHOOT01	The agencies consulted with DWR and PLPCO in accordance with the Dingell Act for recreational shooting closures in the BENM. Based on that consultation, as well as information in the EIS, the Proposed Plan would prohibit dispersed recreational shooting across the entire Monument for public safety, administration, and compliance with applicable laws, including FLPMA and the Antiquities Act. See Recreation Use and Visitor Services for a discussion of impacts to BENM objects from recreational shooting.
17573-103	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Hunting and fishing in Utah is protected in the Utah Constitution ⁷⁴ (Article I, Section 30)	REC06-Shooting Sports/Hunting/Fishing	The use of firearms in the lawful pursuit of game will not be affected by the recreational shooting closure in the Proposed Plan.
17573-80	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The DWR, BLM, USFS, and the Utah Public Land Policy Coordinating Office (PLPCO) collaborated on developing a recreational shooting definition that should be added to the RMP. Recreational Shooting: The discharge of firearms (as defined in Utah Code 76-10-501) for recreational purposes. This definition excludes the discharge of firearms when lawfully hunting protected and non-protected wildlife (as defined in Utah Code 23A and other applicable laws), or when verifying firearm accuracy immediately prior to or during the lawful hunting activity.	REC06-Shooting Sports/Hunting/Fishing	Hunting is permitted by the state and lawful pursuit of game would not be limited in the plan. The Proposed Plan includes a definition of recreational shooting.
17573-81	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The RMP uses different terminology, such as recreational shooting and firearm use. Firearm use and recreational shooting should be defined or changed. We recommend all alternatives reflect the same recreational shooting and use the above defined.	REC06-Shooting Sports/Hunting/Fishing	The agencies have updated language in the Proposed Plan to consistently refer to "recreational shooting."
18983-1	Doug Goodall		If target shooting is allowed it should be restricted to a few small areas just off the roadways.	REC06-Shooting Sports/Hunting/Fishing	Under the Proposed Plan, recreational shooting would be prohibited in the BENM. See the Recreation Use and Visitor Services section of Chapter 3 for a discussion of impacts on recreational shooting closures on recreational users. Recreational shooting management intends to reduce user conflicts while protecting Monument objects. The agencies would continue to coordinate with the State of Utah on recreational uses.
8767-1	Trent Herring		When I read that recreational shooting will be be allowed except in certain areas with future restrictions being added if problems exist worries me quite a bit. Who determines a problem? What is the actual definition of recreational shooting? That is not spelled out anywhere through this plan. I am making an assumption that is being left open ended to ensure hunting can be limited or even eliminated throughout BENM. Without a thorough explanation of recreational shooting and a much needed guarantee that the past time of so many San Juan County Residents of all cultures will not be affected, I cannot properly make a comment about recreational shooting. This must be addressed before any plan should be approved.	REC06-Shooting Sports/Hunting/Fishing	The use of firearms in the lawful pursuit of game will not be affected by the recreational shooting closure in the Proposed Plan. The agencies have updated language in the Proposed Plan to consistently refer to "recreational shooting." A definition for recreational shooting is included in the glossary and does not include shooting when in the legal pursuit of game.
9372-8	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Also, under the third purpose of the proclamation, to protect wildlife, the consideration of allowing ethical hunting practices should be considered. So, as mentioned on page 25, Recreational shooting [should] be allowed throughout BENM with the exception of campgrounds/developed recreation sites, rock writing sites, and structural ES-6 cultural sites. If problems with recreational shooting occur in the future, the BLM would consider future restrictions or closures.	REC06-Shooting Sports/Hunting/Fishing	Under the Proposed Plan, recreational shooting is prohibited in BENM. However, the prohibition does not apply to the use of firearms in the pursuit of game.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18995-5	Tim Allen	National Rifle Association; National Shooting Sports Foundation; Boone & Crockett Club; Rocky Mountain Elk Foundation; Delta Waterfowl; Congressional Sportsmens Foundation; Association of Fish and Wildlife Agencies; Public Lands Foundation; Dallas Safari Club; Wild Turkey Federation; Archery Trade Association	Equally egregious is the lack of scientific evidence to support the claim that dispersed recreational shooting is poisoning wildlife. There are no carcasses or gut piles to feed upon and the scattered lead particles from dispersed recreational shooting are unlikely to be a significantly detectable source for lead ingestion. Such an undocumented statement provides no scientific rationale for further closures in the BENM. In fact, it is irresponsible for the LUP/EIS to make such statements and to suggest to the public interested in the future management of the BENM that recreational shooting is having such an effect on wildlife.	REC06-Shooting Sports/Hunting/Fishing, DATA01-Analysis Methods and Data, DINGELL01-mentions Dingell Act	Thank you for your comment. The agencies have added additional information and clarification in the Wildlife and Fisheries section of Chapter 3 in regards to lead poisoning associated with wildlife.
12746-5	Scott Jones 3301 Fairway Drive Argyle, TX 76226	ORBA, SEMA, TPA, COHVC0	The lack of support for any assertion of improved recreational access is not limited to just motorized recreation, but appears to involve every recreational activity reviewed in the Proposal. Rather than providing detailed discussions of how the Proposal is expanding recreational access, the Proposal makes the unusual assertion that decisions will increase recreational conflicts as follows: Alternatives A, B, C, and D would generally allow recreational shooting except in campgrounds or developed recreation sites, rock writing sites, and structural cultural sites (with the inclusion of WSAs and LWC under Alternative D). Alternatives B, C, and D would also prevent recreational shooting where prohibited under SRMAs, RMZs, or MAs. This management would continue to result in potential conflicts between user groups over recreational shooting. [see letter for emphasis]	REC06-Shooting Sports/Hunting/Fishing, DATA01-Analysis Methods and Data	The Proposed Plan provides a variety of access for recreation, including non-motorized recreation such as hiking, rock climbing, and other popular activities. While the Proposed Plan does prohibit target shooting within the Monument, there are opportunities for such activities in other areas managed by the Agencies. All recreation activities will be managed to protect Monument objects and manage to reduce user conflicts.
18995-4	Tim Allen	National Rifle Association; National Shooting Sports Foundation; Boone & Crockett Club; Rocky Mountain Elk Foundation; Delta Waterfowl; Congressional Sportsmens Foundation; Association of Fish and Wildlife Agencies; Public Lands Foundation; Dallas Safari Club; Wild Turkey Federation; Archery Trade Association	We also express opposition to Alternative E, the preferred alternative, inasmuch as it holds the potential for supplanting the authority of the Utah Division of Wildlife Resources over management of hunting by requiring a special permit system on federal lands in the BENA. This would occur if the Tribal Coalition's Plan, included in the Draft LUP/EIS, were to be adopted. Such a permit system would wrongly restrict the State's authority to manage wildlife.	REC06-Shooting Sports/Hunting/Fishing, DINGELL01-mentions Dingell Act	The use of firearms in the lawful pursuit of game will not be affected by the recreational shooting closure in the Proposed Plan.
17169-1			Recreational and target shooting under Alternative D is preferred. From a lands management perspective, it's unreasonable to eliminate all recreation and target shooting within the BENM landscape. Eliminating recreational/target shooting under Alternative E runs the risk of creating a backlash of Second Amendment rhetoric and drawing that crowd to the Monument. Alternative D provides an equitable resolution and should be incorporated into the final management plan. Of course, shooting-related impacts on traditional sites, livestock, ecologies, etc, should be monitored. A provision should be included that if there are negative culminating impacts, recreational/target shooting should be restricted or eliminated from the boundaries of BENM.	REC06-Shooting Sports/Hunting/Fishing, SHOOT01-not in favor of shooting closures, ALTO4-Alternative D	Under the Proposed Plan, recreational shooting would be prohibited in the BENM. See the Recreation Use and Visitor Services section of Chapter 3 for a discussion of impacts on recreational shooting closures on recreational users. Recreational shooting management intends to reduce user conflicts while protecting Monument objects. The agencies would continue to coordinate with the State of Utah on recreational uses.
1473-3	Lis		Create designated public shooting areas to keep potential disturbances confined to specific areas.	REC06-Shooting Sports/Hunting/Fishing, SHOOT01-not in favor of shooting closures	The agencies considered the commentor's suggestion. Under the Proposed Plan, recreational shooting would be prohibited in the BENM. See Section Environmental Consequences under Recreation Use and Visitor Services for a discussion of impacts on recreational shooting closures on recreational users.
17252-6	Dallas Safari Club Archery Trade Association National Shooting Sports Foundation Boone & Crockett Club Congressional Sportsmen's Foundation Delta Waterfowl Wild Turkey Federation National Rifle Association Rocky Mountain Elk Foundation Tom Allen 1959 Stone Canyon Court Grand Junction, CO 81507 Association of Fish and Wildlife Agencies		Bias against recreational shooting is apparent in several ways. For example, closures are proposed in remote areas such as on land with wilderness characteristics where recreational shooting rarely takes place, but where hunting and the discharge of firearms is most likely to occur. However, hunting has no prohibitions or closures, nor should it. This is only to demonstrate the lack of rationale that is being used to limit or prohibit recreational shooting.	REC06-Shooting Sports/Hunting/Fishing, SHOOT01-not in favor of shooting closures	Under the Proposed Plan, recreational shooting would be prohibited in the BENM. See the Recreation Use and Visitor Services section of Chapter 3 for a discussion of impacts on recreational shooting closures on recreational users. Recreational shooting management intends to reduce user conflicts while protecting Monument objects. The agencies would continue to coordinate with the State of Utah on recreational uses. Proclamation 10285 incorporates by reference Proclamation 9558, which states that designation of the BENM does not diminish the jurisdiction and authority of the State of Utah with respect to fish and wildlife management, including but not limited to hunting. The use of firearms in the lawful pursuit of game will continue to be permitted on BENM.

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17252-7	Dallas Safari Club Archery Trade Association National Shooting Sports Foundation Boone & Crockett Club Congressional Sportsmen's Foundation Delta Waterfowl Wild Turkey Federation National Rifle Association Rocky Mountain Elk Foundation Tom Allen 1959 Stone Canyon Court Grand Junction, CO 81507Association of Fish and Wildlife Agencies		In a variety of instances, the LUP/EIS speaks to recreational shooting closures to reduce the presence of trash and bullet damage to rocks, soil, and vegetation. There is little or no evidence of these impacts actually occurring in the BENM. Nonetheless, there is nothing other than prohibitions as a means of addressing recreational shooting. Similar impacts, as stated in the LUP/EIS, are occurring as a result of other forms of recreation; however, the response is to recommend some closures, seasonal closures, use by permit, etc. related to these impacting uses. It gives the clear impression that the BLM is working to accommodate all the other recreational uses, but not recreational shooting.	REC06-Shooting Sports/Hunting/ Fishing, SHOOT01-not in favor of shooting closures, DATA02-Inadequate Methodologies	The agencies are aware of damage to cultural resources from unregulated recreational shooting, as well as instances of individuals using trash for target practice and leaving those targets on the landscape. The Proposed Plan also proposes various restrictions on other recreation activities, see the Recreation and Visitor Services section.
9372-7	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Recreational Shooting is mentioned 79 times throughout the draft. In most cases, it is mentioned in prohibiting its use. In a very direct prohibitionary statement in the last paragraph of page 621, the use of recreational shooting is prohibited throughout the whole of the monument under the preferred alternative. As an avid outdoorsman, a hunter by passion and by trade, and a gun enthusiast, this is very concerning to me. First, and foremost, in all the times the term is mentioned, it is never defined. I hunt for conservation and meat harvesting, but I also consider it recreational. On BLM.gov (https://www.blm.gov/programs/recreation/recreation-programs/recreational-shooting), it does separate recreational shooting from hunting, but in other dictionary sources, the two are not separated and provide concern that this undefined term could lead to future, unintended consequences. Therefore, to include this in the final plan, it must have a clear and direct definition applied to it.	SHOOT01-not in favor of shooting closures, REC06-Shooting Sports/ Hunting/ Fishing	The use of firearms in the lawful pursuit of game will not be affected by the recreational shooting closure in the Proposed Plan. The agencies have updated language in the Proposed Plan to consistently refer to "recreational shooting." See the glossary for definition of recreational shooting. While hunting could be considered recreational, the prohibition does not pertain to the legal pursuit of game animals and will not affect hunting in BENM.
1193-1	Laura Mazar		I ask that you adopt the preferred alternatives plan to close the monument to target shooting.	SHOOT02-in favor of shooting closures, ALT08-Selection of the Preferred Alternative	The Proposed Plan closes the Monument to recreational target shooting.

Table U-24. Riparian, Wetland, and Water Resources

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
15761-10			What happens if braided stream channels were historically found in the water ways where meanders were part of the system? Please identify these areas. Meanders are a natural progression in rivers getting old. It may be different is areas with flash fl.	WAT01-General	Goals and Objectives in the Water Section include protecting, maintaining, and restoring water resources and riverscapes.
11767-4	Steven Kloetzel		A comprehensive River Management Plan for the San Juan River should be developed within 5 years, with conservation and protection of cultural resources as a priority over increased use.	WAT01-General, ALT05-Alternative E	Please see the Recreation Appendix San Juan River Section, which prioritizes the completion of an implementation-level RAMP in coordination with the BEC, NPS, and the Navajo Nation within 2 years of the issuance of this RMP/EIS.
18302-4	Joe Jones		Also, the importance of developing a comprehensive river management plan for the San Juan River; this plan should be developed with conservation and protection of cultural resources as a priority over increased use.	WAT01-General, ALT05-Alternative E	The BLM will prioritize completion of an implementation-level plan for the San Juan River, which will align with protection of BENM objects and values as outlined in Proclamation 10285. Recreation is an allowable use to be managed, but not an object of the San Juan River in BENM as defined in the Proclamation.
1980-3	Thea Levkovitz		There are some improvements that could really make this Alternative E the gold standard for land management. 2) There should be no new water developments allowed.	WAT01-General, ALT05-Alternative E	Under the Proposed Plan in the Alternatives for Water Resources table in Chapter 2, new groundwater withdrawals or diversions would not be authorized unless necessary to ensure the protection of BENM objects and require a hydrologic study. Under the Proposed Plan in the Alternatives for Livestock Grazing in Chapter 2, new water developments and modifications to existing water developments for livestock grazing purposes are prohibited, unless: The primary purpose is to protect or enhance BENM objects; and on BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
17573-85	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Page 2-19 Matrix preferred alternative expresses vegetation treatments removing nonnatives; this conflicts with page 2-20.	WAT01-General, ALT07-Modification of Existing Alternatives	Inconsistency clarified in Proposed Plan.
18082-29	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	There is limited information regarding water quality and riparian area conditions in the Draft EIS. Table 3-14 does list the waterbodies that are on the Utah 2022 Clean Water Act (CWA) 303(d) impaired waters list, and of the waterbodies that were assessed, there are 20 that are impaired (pp. 3-54 and 3-55). Many of the impairments listed may be attributed to BLM-authorized activities and	WAT01-General, ALT07-Modification of Existing Alternatives	Time frames for implementation level actions are provided where available, however, timeframes for all implementation actions are not known at this time.

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			surface disturbance (e.g., E. coli, selenium, and dissolved oxygen). We are encouraged to see a commitment to develop a comprehensive monitoring plan to track water quality conditions and a commitment to complete a comprehensive spring, seep, and water resources inventory within the Monument (p. 2-18). We recommend that for any commitment in the EIS and RMP the BLM include milestones and timeframes for completion.		
18082-30	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS explains that the BLM utilized the Lotic Assessment, Inventory, and Monitoring (AIM) Strategy data for this planning effort and refers the reader to Appendix K for more information (p. 3-57). Without BLMs analysis of these data in the Final EIS it does little to inform and disclose because the data are difficult to interpret for the average reader and the lack of a narrative/explanation leaves it to the reader to speculate how it was utilized in the analysis. We recommend in Section 3.4.3.1.1. of the Final EIS the BLM summarize the data in Appendix K for the reader, discussing BLMs interpretations and conclusions, and how it utilized this data to evaluate how the proposed alternatives will impact Monument ROVs.	WAT01-General, ALT07-Modification of Existing Alternatives	See Appendices A, N, and K for discussion of AIM data.
18696-8	Julian Soncco		Limit access to at least half a mile to riparian areas from any forms of mineral or resource extraction, OHV use, camping, grazing and ROW allowance to protect water resources for human, wildlife and vegetation. Extensive monitoring and adaptive measures developed alongside Tribal nations to protect waterways, springs and riparian areas must be done in all areas of the monument.	WAT01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan does consider the effects and places limits on what can occur in riparian areas. There are restrictions in the plan for recreation, grazing, and ROWs to protect the waters of BENM. See the Water Resources section in Chapter 2. Under Presidential Proclamation 10285, subject to valid existing rights, BENM is withdrawn from all forms of mineral entry, location, selection, sale, leasing, or other disposition.
3125-6	Steve Knox		Page 2-18, 2.4.6, Water Resources, Management Common to All Action Alternatives, bullets 1, 2, and 9 How do you manage for water quantity? What specific actions do you propose? This information is needed to consider consistency with and impacts to other resource values and uses?4.	WAT01-General, ALT07-Modification of Existing Alternatives	Under all alternatives, including the Proposed Plan, agencies would conduct monitoring to track water quantity across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects. Additionally, the BLM plans to continue AIM monitoring across the Monument to understand watershed health. See the affected environment section for Water resources in Chapter 3 and Appendix A, N, and K for additional details on AIM Monitoring.
17969-11	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Water Resources TNC supports Alternative Es proposed management actions that support riparian and wetland resource proper functioning conditions (PFCs), water resource quality and quantity, and watershed and natural catchment groundwater recharge. Approaches in the Draft RMP/EIS such as removing woody invasive species and restricting camping within a certain distance of water bodies will aid in restoring critical natural processes and hydrologic regimes. The Proposed RMP/Final EIS should accommodate and allow for the LTPBR riparian and upland restoration work TNC is undertaking in partnership with the CRC and the BLM as described above. First, we suggest adding additional language to the Proposed RMP/Final EIS to allow restoration practitioners and partners to coordinate with agencies, the BEC, and Tribal Nations to potentially harvest and use limited cottonwood and willow materials for restoration projects when other woody materials are limited. This would support the success of the TNC BLM LTPBR cooperative agreement (Attachment C), where a core tenet of process-based restoration is the use of natural, locally-sourced materials (i.e., wood, rock, and soil) to build instream restoration structures. Second, TNC recommends including the following language from Alternative B: Available for habitat, watershed improvements, and vegetation treatments designed for long-term benefits to riparian, wetland, or aquatic habitats (e.g. side channel restoration, invasive plant removal, process-based restoration to the Proposed RMP/Final EIS to clarify that side channel restoration, invasive plant removal, and process-based restoration are types of treatments that would be implemented on a seasonal basis determined in collaboration with the BEC and Tribal Nations. Finally, we recommend that the Proposed RMP/Final EIS allow the use of mechanized or motorized equipment, in consultation with the BEC and Tribal Nations, in certain floodplain and riparian settings for process-based restoration projects where rocky, cobble substrates otherwise limit the efficacy of hand-built structures. In our experience implementing process-based restoration on TNC private lands of the Dugout Ranch, the use of some motorized equipment (i.e., track hoe and/or post pounder) can greatly facilitate the building of instream structures in the rocky, cobble-bottomed streams common to the Bears Ears region.	WAT01-General, ALT07-Modification of Existing Alternatives, DATA03-Suggest Additional Data Source	Low-tech process-based restoration was added to the Proposed Plan in the Wildlife and Fisheries and Special Status Species sections of Chapter The Alternatives for Water Resources table discusses the use of motorized/mechanized equipment in floodplain restoration. The Proposed Plan prioritizes minimally invasive treatments where practicable, but vegetation treatments would include all available tools.
752-1			As background, before its diversion, Indian Creek provided relatively large perennial flows from the Abajos and Shay canyon out into the valley and through the hoodoos. Although your EIS does not describe it, the stream likely supported important populations of leopard frogs, fish, native riparian vegetation and associated wildlife down to the Colorado River. With the diversion to Johnson creek and overgrazing in the Dugout ranch valley, much of that was lost. Although I appreciate your important plans for PWRs and hydro studies, and the NF stream rehab work in Indian creek. they will not be enough to let you meet the goals and objectives in the old, let alone the new version of the RMP. See them in secs. 2.4.5, .6, .7 and .11. As a result of a hundred years of overgrazing and the loss of most of the streams original flow to diversions to Blanding and Dugout, it cannot be expected to regain the plant and animal population losses in that part of the monument. Please consider rehabilitating the Indian creek stream and corridor by redirecting some of the flow otherwise diverted at the tunnel. Some of the stream flow to Blanding is not productively used. For example, when the city considers selling off some of the acre feet it receives, that is a sign to me that it has more water than it needs. Through negotiations with the water rights owners of the diverted water, as well as	WAT01-General, DATA01-Analysis Methods and Data	Specific decisions about rehabilitating Indian Creek would be made via an implementation level project and associated analysis. Future work with cities, landowners, other federal agencies, Tribal Nations, and other partners regarding water quantity and quality will continue and be part of implementation of this RMP as part of managing for the objects of BENM.

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			UDWR and fish & game, and the Dugout water owners, the BLM and the NF may put some of the original Indian creek back to work in its old stream bed. That added annual flow would help you meet your own legal responsibility to restore the monument proclamations objects in Indian creek valley.		
14767-203	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.3.1.3 the BLM states: Management of riparian areas and floodplains is essential to protecting water resources within the Planning Area. But the DRMP fails to implement any requirements and limitations (not just aspirational goals) to protect water resources from the primary impact, livestock grazing.	WAT01-General, DATA02-Inadequate Methodologies	In the RMP, there are multiple limitations outlined across alternatives that are designed to manage livestock to protect water resources. See the Proposed Plan in the Livestock Grazing section under the Livestock Grazing header for each Alternative for additional details.
9372-36	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	This draft plan puts a lot of weight on the impacts the Arch Canyon trail has on the water and riparian sources in the canyon for its closure. However, the draft provides no evidence or link to any environmental impact study. When addressed with the BLM and USFS during public meetings, they could also not provide any environmental impact study. The draft plan claims Under all alternatives, agencies would conduct comprehensive monitoring to track water quality conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects. Additionally, under all alternatives, agencies would conduct a groundwater study. Additionally, water resources under all alternatives would be managed to ensure stream channel morphology and functions are appropriate to the local soil type, climate, and landform and ensure ecological diversity, stability, and sustainability, including maintaining the desired mix of vegetation types and structural stages. (Page 32-33) If the plan calls for thorough studies of the water system before making changes, then this seems contradictory for not providing any such study before even discussing closing such an iconic trail.	WAT01-General, DATA02-Inadequate Methodologies	Additional analysis was added to the affected environment section for Water Resources in Chapter 3 regarding impacts of OHV use in Arch Canyon.
889-102	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The statement in the DEIS that the BLMs pre-2010 monitoring points to water contamination from vehicle disturbance is a blatant mischaracterization of the BLMs actual findings, which actually concluded the exact opposite. Given that the BLM looked at the exact same data the agency now cites in 2010 and concluded it did NOT justify closing the road, the agency cannot now use the same data to claim that closure is necessary. Such a decision would be contrary to the facts in the record and arbitrary and capricious. Nor does it follow the best available science. Only new data demonstrating changed conditions and new adverse impacts can justify closing the road on the basis of riparian impacts.	WAT01-General, DATA02-Inadequate Methodologies, TRAVEL01-General	See the Alternatives for Travel Management table in Chapter 2. The Proposed Plan does not have a closed area designation for OHV use in Arch Canyon. All motorized and non-motorized use within Arch Canyon would require a permit, which permit system would be developed as part of the BENM Travel Management Plan in the future.
1512-5	Art Hanson		I strongly urge you to follow through with the closure of Arch Canyon to off-road vehicles because it will better protect water quality in the canyons rare perennial stream, safeguard the canyons abundant and irreplaceable cultural sites, and promote quiet and contemplative visitation.	WAT01-General, TRAVEL01-General	The agencies considered the commentor's suggestion. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
3125-18	Steve Knox		Page 2-24, Water Resources, Table 2-5, 1986 Manti-La Sal LRMP, Water Use Management, Alternative E To protect the wilderness values on the Forest, add designated Wilderness and IRAs to the list of places where new or expanded water developments would be prohibited, since you are managing for wilderness values in these places under this alternative.	WAT01-General, WSA01-General, ALT05-Alternative E	The majority of the Dark Canyon Wilderness is precluded from grazing and would therefore not have any new range developments proposed within that portion. Grazing in the rest of the wilderness is managed by the Congressional Grazing Guidelines, which provide guidance on new range developments in wilderness. IRAs are not managed to maintain wilderness characteristics
1121-2	Richard Davis		We need to stop target shooting (and the resulting lead poison in the watershed) - nothing gets one more on alert than bullets whizzing by while hiking.	SHOOT02-in favor of shooting closures, WAT01-General	The Proposed Plan closes the Monument to recreational target shooting. Restricting target shooting would limit shooting noise, the presence of trash, and bullet damage to rocks, soil, and vegetation. At this time, there is no conclusive evidence of lead poison in the watersheds in BENM linked to target shooting.
17646-3	Martha Ham Leeds, UT 84746		Ensure that sufficient monitoring data is collected for monument watersheds to adequately assess impaired water status.	WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology), ALT05-Alternative E	Under all alternatives, agencies would conduct comprehensive monitoring to track water quality conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects. Additionally, the BLM plans to continue AIM monitoring across the Monument to understand watershed health. See the affected environment section for Water resources in Chapter 3 and Appendix A, N, and K for additional details on AIM Monitoring.
18082-28	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend ephemeral streams are added to the water resources goals and objectives, and management actions. We also recommend adding a requirement for setbacks for surface-disturbing activities from ephemeral streams to protect ecological and water quality connections. Protection and/or restoration of these resources is essential for the integrity of downstream waters. Like perennial and intermittent streams, ephemeral streams provide ecological and hydrological functions by moving water, nutrients, and sediment throughout the watershed. Ephemeral streams play important roles in protecting downstream water quality and contribute to aquatic wildlife habitat, especially in the arid and semi-arid west.	WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology), ALT07-Modification of Existing Alternatives	Thank you for your comment. Ephemeral streams are managed by multiple surface water management actions.
18238-7	Chaitna Sinha		We propose: The following additions (in bold), and provisions incorporated from Alternative D (underlined) should be included in Alternative E: In collaboration with the BEC, new water withdrawals or diversions will not be authorized unless absolutely necessary to ensure the protection of BENM objects and it can be shown through tangible research that there are no alternatives to protect BENM objects. This research should be documented for review by the BEC. Require a hydrologic study for all proposed groundwater withdrawals. Prohibit modifications to existing water developments for	WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology), ALT05-	Thank you for your comment. The Proposed Plan considered this input. Hydrologic studies would be required for all proposed discretionary land uses supporting groundwater withdrawals. In the Livestock Grazing section of Chapter 2, the Proposed Plan would allow water developments to be developed and/or maintained as authorized only if consistent with the protection of BENM objects. Additionally, new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. A current land health assessment for within the last 10 years would

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			livestock grazing purposes, unless: The primary purpose is to protect BENM objects; and BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed, and, if needed, a causal factor determination has been made for the allotment or applicable watershed. As informed by the land health assessment and causal factor determination, the modified water development would support the achievement of the BLM Utah Rangeland Health Standards. An exception to this requirement could be approved for modifications to water developments to prevent imminent damage to BENM objects. Livestock will be excluded from perennial surface water (except existing stock ponds) and associated riparian areas and springs. Existing water developments for livestock or wildlife will be removed unless they protect BENM objects, where feasible. If it is not possible to be removed, the existing water development will be reclaimed and/or restored, as appropriate. Corresponding changes may be necessary to applicable livestock grazing permits. [see letter for emphasis]	Alternative E, GRAZ01-General	be required for new water developments/range improvements, or modifications to existing water developments/range improvements. Under the Proposed Plan, within 3 years of the signing of the ROD, allotments prioritized for land health evaluations will be assessed to inform and grazing permit renewals and determine changes needed to support the achievement of BLM Utah Rangeland Health Standards. The Proposed Plan also requires the agencies to prioritize the review and processing of grazing permits and leases, including compliance monitoring and resource assessments. Grazing permit renewals will be guided by current land health evaluations. The agencies will complete annual monitoring reports for grazing in collaboration with the BEC under the Proposed Plan as well, and Traditional Indigenous Knowledge will be incorporated for livestock grazing management where applicable. The agencies will also consider identifying sub-areas in allotments for closure or periodic rest to help achieve Rangeland Health Standards.
9279-1	A friend to our public lands		No new wells should be approved to protect aquifers and dependent springs.	WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology)	The livestock grazing section of Chapter 2 discusses the Proposed Plan's management actions for new water developments. They are prohibited unless they can protect BENM objects. The Water resources section of Chapter 2 includes protection for water sources.
9372-37	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Arch Canyon is a conflict because it is popular for hikers as well as OHV users. An 18-mile hike is often going to be a 2-day event. I believe camping is prohibited within 200' of a water source. In Arch Canyon, even if you are 200' from the creek, the entire canyon experiences running water as it travels down into the creek during flash flood events. If the riparian resources are the highest concern for closing the trail, there should also be a conversation about the impacts that backpackers have on the same ecology.	WAT02-Surface Water (including quality/quantity, seeps/springs, hydrology)	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon Sub-Area would be allowed with a permit. This permit system would allow for access to Arch Canyon in a manner that protects Monument objects.
18238-8	Chaitna Sinha		While we strongly believe FS and BLM should not allow any new water developments for livestock, if the Agencies do permit this, we appreciate that a hydrological study will be required for all proposed groundwater withdrawals. The hydrologic analysis should consider locations of the wells in relation to faults in the watershed. Fractured rock generally has greater groundwater storage and better recharge. Unfractured rocks generally have less storage and slower recharge. Wells in unfractured areas mean that groundwater pumping from wells will likely be more connected to local springs. The demands on the aquifer, recharge rates, and residence time of the groundwater should all be considered.	WAT03-Groundwater (including quality/quantity, Groundwater Protection Zones (GPZs)), ALTO5-Alternative E, DATA01-Analysis Methods and Data	The Proposed Plan as described in the Alternatives for Water Resources Table in Chapter 2 states "In collaboration with the BEC, new land use permits supporting groundwater withdrawals or diversions would not be authorized unless necessary to ensure the protection of BENM objects. A hydrologic study would be required for all required land uses supporting ground water withdrawals."
754-1			In the rmp, include a plan to stop the flows from the artesian wells on BLM land at the Neilson reservoir stock tank at south end Cottonwood Wash. The wells have flowed several cubic feet per minute from BLM land for a hundred years. It is wasted out of the Navajo sandstone aquifer, and is illegal.	WAT03-Groundwater (including quality/quantity, Groundwater Protection Zones (GPZs)), GRAZ01-General	The Proposed Plan as described in the Alternatives for Livestock Grazing table in Chapter 2 says that existing water developments for livestock grazing purposes not consistent with protecting BENM objects would be removed, modified, or abandoned.
9255-11	Keith Alleman		Page ES-12, paragraph ES-5.1.3 States "This is less protective against impacts to groundwater than Alternatives B and C which require hydrologic studies for any withdrawal within 0.25 mile and 0.5 mile, respectively." This phrasing is vague. The phrasing should clarify what the withdrawal has to be within 0.25 or 0.5 mile of, such as "...require hydrologic studies for any withdrawal within 0.25 mile and 0.5 mile of Bob's house, respectively." [per page 3-83 it looks like I'm looking for the term "of a water feature," though that is painfully vague. Add "water feature" to the glossary.]	WAT03-Groundwater (including quality/quantity, Groundwater Protection Zones (GPZs))	Thank you for this comment. This paragraph clarifies the specifics of Alternatives B and C in regard to the distances. The term water feature was changed to water well.
9372-10	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	On page 32, the management plan states, Under Alternatives D and E, agencies would manage discretionary uses to protect public Drinking Water Source Protection zones. This higher level of protection would improve protection of public drinking water sources relative to Alternative A which avoids or limits disturbance in public drinking source water protection zones. Public drinking water is harvested from the watershed of the Abajo Mountains and uses a controlled and monitored system to transport the water to collection reservoirs where it is stored until it is later filtered and prepared for culinary use. The watershed is already protected and steps are currently in place to harvest, transport, store, clean, and distribute in a clean and regulated manner. Additional protections would hinder land and resource usage without providing any notable benefits.	WAT03-Groundwater (including quality/quantity, Groundwater Protection Zones (GPZs))	Thank you for your comment. See the Water Section of the Proposed Plan in Chapter 2.
14767-120	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under all alternatives, agencies would conduct comprehensive monitoring to track water quality conditions across the Monument But this appears to be unsupported by the DRMP itself which contains no such mandate.	WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	The Water Resources section of Chapter 2 includes management actions common to all action alternatives, including the Proposed Plan regarding monitoring and protection of water quality including: agencies would conduct comprehensive monitoring to track water quality conditions across the Monument and would collaborate with the BEC to develop a groundwater/surface water technical study and monitoring plan, including, but not limited to, studies related to pumping impacts, water well production rates, water levels in water wells, and triggers for adaptive management, if needed, to protect BENM objects; agencies would conduct a groundwater study on the Cedar Mesa Sandstone and N aquifer to better understand characteristics, current conditions, recharge areas, recharge rates, groundwater budget (inflow vs. outflow), travel time, and springs; and Maintain and enhance water quantity and quality, the desired mix of vegetation types, structural stages, and landscape/riparian/watershed function to protect BENM objects. Additionally, under the Proposed Plan, agencies would conduct groundwater studies before any discretionary actions for land uses that would withdraw water from the

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					monument. The agencies would also work with UDWQ on water monitoring for surface water. Additional discussion on AIM monitoring can be found in Appendix A, K, and N.
14767-169	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Any spring and seep developments will be designed and constructed to protect ecological processes and functions and improve livestock and wildlife distribution. Virtually all spring and seep developments have already occurred, so would be exempt. But even if this was applied, the focus is on livestock production, not the mandate to restore objects. You are degrading a natural water source for the use of livestock production.	WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	The water resources section of Chapter 2 discusses actions to protect springs and seeps under the Proposed Plan, including monitoring requirements.
17350-1	Rachel Kunselman		I have seen the effects of cattle grazing all throughout southern Utah, leaving riparian areas torn apart and unclean water for native species that rely on that water for survival.	WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems	Thank you for your comment.
14767-147	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Under Alt E, which will not be chosen, provides: No discretionary actions that alter vegetative cover, result in stream channel instability or loss of channel cross sectional area, or reduce water quality would be allowed within 100-year floodplains or within 0.5 mile of riparian areas and along perennial and intermittent springs and streams unless absolutely necessary to protect BENM objects But because the BLM has arbitrarily deemed permitted livestock as mandatory, not discretionary, this does not apply to the primary impact to vegetative cover, stream channel stability, water quality.	WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems, ALTO5-Alternative E	As stated in the Water Resources section of Chapter 3, impacts from water developments related to livestock grazing would be evaluated at the implementation level on a case-by-case basis. A springs study conducted by SSI in 2021 on NFS lands within the Planning Area found that spring flow in the Monument is low, and that there are some impacts to springs within the Planning Area due to livestock herbivory that alters the springs physical condition (SSI 2022). Livestock grazing is managed under all alternatives through a permitting system. For additional information on livestock grazing management throughout the Monument, see Appendix N. In reference to Alt E: See Appendix I for a full summary of all HUC 12 watersheds and acreage of livestock grazing management designations. Under Alternative E, there is a total of 1,194,529 acres available for livestock grazing (approximately 88% of the total Planning Area). This is approximately 2% less than what is available under Alternative A. Additional actions under Alternative E, including prioritization of the review and processing of grazing permits and leases; identifying subareas of allotments necessary for closure; reassessment of stocking levels and season of use; reassessment of management approach; and identification of resource thresholds, monitoring, and automatic responses related to land health and/or impacts to cultural and sacred resources. These additional actions could provide additional protection to water resources from grazing when compared to Alternative B. Livestock would be managed under Alternative E to prohibit trailing along the full length of riparian areas and to rehabilitate existing livestock trailing corridors where damage has occurred in riparian areas. This is more protective of riparian ecosystems than Alternative A. Prohibiting livestock in riparian areas decreases sediment and E. coli loading to nearby surface waters. Additionally, as part of livestock management under Alternative E, the BEC would collaborate with the agencies to facilitate infrastructure to encourage cattle away from springs. Studies in the Monument have shown that livestock impacts to springs can be mitigated by infrastructure such as fencing.
17969-9	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Similar to water development, the prohibition of trailing and grazing livestock along the length of riparian areas will make practical operation of grazing permits within BENM impossible and impair the research being done by the CRC. TNC recommends that the Proposed RMP/ Final EIS include language from Alternative B that manages for livestock avoidance of riparian areas and uses monitoring, restoration, and new management technologies, such as virtual fencing, to inform livestock and riparian management. TNC recommends that the BLM seek additional data to complement the lotic AIM data utilized in the Draft RMP/EIS to determine where grazing and trailing should be allowed. Accurately assessing the condition of an entire stream reach can be difficult with a limited number or limited time frame of replicated sampling sites, as is the case with the lotic AIM monitoring sites listed in Appendix K for North Cottonwood Creek. When examining the indicators that go into the Lotic AIM departure, they fluctuate widely even though grazing use has not fluctuated, suggesting that covariates other than grazing (e.g., drought and measuring water quality during runoff) are driving these changes.	WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems, ALTO7-Modification of Existing Alternatives, GRAZO1-General	The Alternatives for Livestock Grazing table and the Alternatives for Water Resources table in Chapter 2 include management actions for the protection of water resources. The Proposed Plan prohibits trailing in riparian corridors except where existing livestock corridors occur, and rehabilitates existing corridors where damage is occurring to riparian resources. The BLM utilized the best available data to create the management in this RMP/EIS.
14767-119	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	ES-12 Under all alternatives, goals of this RMP are to manage riparian and wetland resources for PFCs; While this may be a goal, there are no requirements or limitations to achieve this goal. Beyond that, it clearly demonstrates the BLMs lack of understanding of what PFC is. PFC is simply the minimal physical functioning to withstand a 20 year flood event, but is below the level needed to provide for watershed values, wildlife habitat or certainly protection and restoration of objects.	WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems, DATA02-Inadequate Methodologies	Proper functioning condition (PFC) assessment methodology is defined in Appendix N. In addition, a more detailed analyses will be conducted at the implementation/individual project stage to provide more details. The Proposed Plan, as discussed in the Alternatives for Water Resources table in Chapter 2, also discusses actions for watershed protection.
18082-31	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS describes what the Proper Functioning Condition (PFC) Assessment is, and it states, Management described in the following Environmental Consequences section refers to this PFC assessment. For more information, see Impacts Common to All Alternatives (pp. 3-65 and 3-66). Under Impacts Common to All Alternatives, it states, All alternatives must manage riparian and wetland resources for PFCs and aim to maintain and enhance water quality in the Decision Area. In the Draft EIS we could not locate existing PFC data in the planning area, how the data were used to evaluate potential impacts, or how these data were used to inform the proposed alternatives. This makes it difficult to understand current functioning of riparian areas in the planning area and what site-specific actions may be needed to achieve restoration and protection of riparian areas and associated streams. We recommend including existing PFC data in the Final EIS, discuss how it was used to evaluate potential impacts to Monument ROVs and inform the proposed alternatives, and	WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems, DATA01-Analysis Methods and Data	The management actions and analysis are informed by PFC data and is kept on file at the Monticello Field Office. Timeframes for implementation level actions are provided where available, however, timeframes for all implementation actions are not known at this time.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			identify where additional management actions are needed to restore and protect riparian areas. We also recommend prioritizing and setting a timeframe for completion of PFC assessments in the Monument.		
17573-84	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	page 2-19 Matrix floodplains riparian/ aquatic areas preferred alternative (i.e., E) excludes mechanized and motorized equipment. Best management practices for habitat restoration may include mechanized equipment and should be allowed.	WAT06-Floodplains, ALT05-Alternative E	The Proposed Plan as discussed in the Water Resources section of Chapter 2 states that floodplains and riparian/aquatic areas are excluded from surface disturbance by mechanized or motorized equipment and from structural development unless to protect BENM objects (e.g., habitat restoration and fire suppression). The use of mechanized equipment for habitat restoration may be evaluated at the implementation level planning

Table U-25. Soils

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
14767-194	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Impacts from ground-disturbing activities on soil resources can be mitigated through applicable stipulations or measures that address site-specific environmental concerns. Mitigated does not mean restored. Has the BLM proposed any stipulations or measures to eliminate the soil impacts caused by their permitting of livestock grazing? No. So, like much of the EIS, this is meaningless fluff to distract the casual reader.	SOILS01-General	The Proposed Plan includes management actions to protect soils, see Livestock Grazing section and Soil Resources section.
14767-200	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.2.2.7, we see the fabrication: Soil management goals under Alternative E would be to maintain or improve soil quality and long-term soil productivity using culturally led standards, and to use collaboration with the BEC to benefit natural ecosystems, native species, and important relationships between water and soil. Alternative E focuses on ecosystem functioning and a return to natural states with regards to soil management. Additionally, Alternative E would emphasize Traditional Indigenous Knowledge and Tribal policies and guidelines, peer-reviewed literature based on the best available Western science, and best management including Traditional Indigenous Knowledge and practices to restore soil crusts. Firstly, the goals may be nice aspirations, there are no requirements or limitations to achieve those nice goals. Next, the BLM mentions culturally led standards but what these are is entirely undefined. In fact, the BLM mentions these culturally led standards in only one other place in the EIS but does not define or list what they are, their effectiveness or any scientific research supporting their use. Likely, the BLM itself doesnt even know what they are and they are simply pulling it out of their hats.	SOILS01-General	An explanation of soil functions has been added to the affected environment section of the Soils and Biological Crusts section in Chapter 3. Soils in BENM would be managed to be consistent with the proper care and management of Monument objects and values, so specific land use plan goals and objectives are not needed. The agencies and the BEC would evaluate and determine site-specific soil management actions through implementation-level management planning and action.
18612-9	Laura Welp 325 NW Cleveland St Pullman, WA 99163	Western Watersheds Project	New impacts as cattle increase utilization around the new wells. This is inconsistent with protection of monument objects. We see this problem already in the discussion on page 3-91. The BLM lists a significant number of water developments and range improvements in several allotments, including the Lockhart, Indian Creek, Slickhorn, and Lake Canyon allotments. This includes 13 earthen reservoirs and five rangeland fences on the Indian Creek Allotment that would hold surface water runoff to provide reliable water, facilitate livestock distribution, and improve control of grazing patterns and forage use levels but may reduce recharge of downstream alluvial aquifers that support riparian and aquatic habitats. Draft RMP at 3-91. Other projected projects to develop reliable water sources consist of two livestock water wells proposed in the East League pasture three water wells proposed on Flats Water pasture, four water wells and one livestock reservoir proposed on Beef Basin and Dark Canyon Ranges, three water wells proposed for livestock on the Slickhorn Allotment, and six water wells on the Lake Canyon Allotment. The draft asserts that these will contribute to reducing pressures on soil disturbance outside of the range allotments but provides no corroborating evidence to support this assertion.	SOILS01-General, DATA02-Inadequate Methodologies	The soils and biological crusts section of Chapter 3 states that range improvements can also have an overall benefit to soil resources when they improve the distribution pattern of livestock grazing across a pasture or allotment (Holecheck et al. 2001). The RMP has been updated to delete East League water wells, as these are not in BENM, Lake Canyon has four water wells proposed, Slickhorn two water wells and Beef Basin, all water wells were dropped from the proposal. The Proposed Plan prohibits new range improvements or modifications to existing range improvements, for livestock grazing purposes, unless: The primary purpose is to protect BENM objects; and BLM-administered lands only: A current (within the last 10 years) land health assessment has been completed.
15381-2	Sagebrush Habitat Conservation Fund		Table 2.4 Alternative Matrix for Soil Resources All alternatives include restrictions on discretionary actions on slopes greater than the range of 21% to 40%. Nowhere in the document is there discussion on how this affects the discretionary action of livestock grazing permitting. If these slope restrictions are meaningful, grazing should at least be unallocated if not restricted from areas with slopes greater than specified. A slope map showing the areas and acreage affected by various alternatives should be presented. If grazing is to be an exception to the slope restrictions, that should be explicitly stated, and the impact analyzed. For Alternative E, the table states the following: Traditional Indigenous Knowledge and Tribal policies and guidelines, peer-reviewed literature based on the best available Western science, and best management practices would be applied to restore soil crusts. While we do not have access to the Indigenous Traditional Knowledge, the Western Science is clear that livestock grazing is not conducive to restoring biological soil crusts. How can you say your alternative will restore soil crusts when present livestock numbers and inappropriate spring and summer grazing are allowed to continue as is? The document bibliography contains excellent sources on the subject of soil crusts and livestock grazing. Why werent these sources used to develop management actions?	SOILS01-General, GRAZ01-General	The Proposed Plan has been updated to include surface disturbing discretionary actions. Management Actions Common to All Action Alternatives under the Soil Resources and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator.

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9296-2	John Carter PO Box 464 Bondurant, WY 82922	Yellowstone to Uintas Connection	Livestock trample the soil, remove soil covering and stabilizing vegetation in upland and riparian areas. They destroy biological crusts, pollute the springs and streams, litter areas with manure, and damage cultural and archeological resources. ¹ These all detract from and heavily damage the objects, visual aesthetics and natural values at issue in the RMP. The soils in BENM are highly erodible and require biological crusts and plants to stabilize them. We see that the RMP has determined, apparently without any systematic or scientific analysis, that 70 - 90 percent of BENM is suitable for livestock. What we dont see in this RMP is a determination of current forage capacity for livestock and wildlife or the setting of stocking rates using adequate rest and todays forage consumption rates.	SOILS01-General, GRAZ01-General, ALT07- Modification of Existing Alternatives	Management Actions Common to All Action Alternatives under Soil Resources and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator. The Proposed Plan outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.
17350-2	Rachel Kunselman		I have seen the damage from motorized use first hand, and it has impacted bio crust, which is essential to the function and longevity of the desert.	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	See the Proposed Plan for OHV area designations. See the Soil Resources Section of the Proposed Plan (cultural, water, soil, and soundscape) for a discussion of impacts on the resources provided in the comment from OHV use.
14767-215	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	AMS 6.3 This section as well as others seems to assume damaging uses will continue despite Proclamation and NLCS direction mandating protection. Managing for healthy biological crusts requires that impacts occur when the crusts are less susceptible to damage and when conditions are best for recovery. Sandy soils are less susceptible to disturbance when moist or wet, while crusts on fine-textured soils are less susceptible when the soil is dry. Failure to properly manage soils after a disturbance can allow irreversible invasion by annual grasses (e.g., cheatgrass). Given the decades to century long recovery time for BSC you can not manage for healthy BSC when you are destroying them. The Proclamation and NLCS requirements do not mandate continuing discretionary uses in a slightly less damaging way, they mandate protection and recovery. Slightly less damage can not rationally be seen as protection.	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	Proclamation 10285 allows for the continued discretionary uses that are consistent with the proper care and management of BENM objects.
15396-4	Kristen Henry		The biological soil crust also needs protection. - Minimizing OHV access to many areas will be beneficial and reduce potential damage to sensitive cultural sites, waterways and springs, and the soil crust. It will also help to safeguard the soundscape. -	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	See the Recreation Use and Visitor Resources section of the Proposed Plan for OHV area designations. See the Soil Resources section of the Proposed Plan (cultural, water, soil, and soundscape) for a discussion of impacts on the resources provided in the comment from OHV use.
18082-49	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	Since biological soils can take up to 250 years to regenerate depending on the species composition, we recommend the Final EIS discuss potential impacts to these sensitive soils and describe impacts to BSCs as irreversible commitments of the resource.	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs))	Impacts to biological soil crusts from land management actions are described in the Soil Resources section of the Proposed Plan. Future management actions would be subject to site-specific NEPA that would include consideration of alternatives and mitigation as appropriate to address any irreversible and irretrievable impacts to soil resources including biological soil crusts.
14767-144	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The next goal is: Protect soil resources and all other resources that depend on the soil as part of the healing landscape of the Monument. Protect highly sensitive soils (highly susceptible to erosion) and biological soil crusts (BSCs). But the above two meaningless actions are the entirety to achieve these goals. How are highly sensitive soils and BSC protected? The BLM will collaborate classify and identify. Beyond that obvious failure, the goals ignore the BLMs mandate to restore. Nothing in the DRPM provides requirements or limitations that would result in restoration. Its sad that I have to remind you to read Appendix C of your own planning handbook	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs)), ALT07- Modification of Existing Alternatives	An explanation of soil functions has been added to the Soil Resources section of the Proposed Plan. Soils in BENM would be managed to be consistent with the proper care and management of Monument objects and values, so specific land use plan goals and objectives are not needed. The agencies and the BEC would evaluate and determine site-specific soil management actions through implementation-level management planning and action.
14767-187	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.2.1.4 regarding BSC, we see: They can be used as an indicator of rangelands ecological health. Development of biological crusts is strongly influenced by soil texture, soil chemistry, and successional colonization by crustal organisms. The type and abundance of biological crusts can be used by the land manager to determine the condition of a site and can help managers understand if recent disturbances have occurred (Belnap et al. 2001). While the statement is factually correct, the next logical step would have been to provide data on crust composition (stage) and coverage and compare that to the potential of a fully healthy BSC community. How can you analyze the impacts of your decision to maintain the status quo livestock grazing on BSC if you dont know what current conditions are and what potential without livestock disturbance is? We provided just such a study from GSENM in scoping, but the BLM simply ignored it. Because of the complete incompatibility of healthy BSC and livestock grazing, in grazed areas BCS is generally extirpated except for areas protected from trampling under shrubs. In areas not grazed by livestock BSC coverage is 80-100% of available habitat.	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs)), DATA02- Inadequate Methodologies	The Soil Resources section of the Proposed Plan states agencies would identify areas with BSCs and classify those crusts to best protect them. Additionally, Traditional Indigenous Knowledge and Tribal policies and guidelines, peer-reviewed literature based on the best available Western science, and best management practices would be applied to restore soil crusts.
14767-188	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Continuing 3.4.2.1.4: Managing for healthy biological crusts requires that impacts occur when the crusts are less susceptible to damage and when conditions are best for recovery. Soil crust components are brittle when dry and their connections are easily crushed. So, impacts from compression disturbance (such as those from vehicles or trampling), while always detrimental to soil crusts, can be more destructive when soils are dry. Failure to properly manage soils after a disturbance can allow irreversible invasion by annual grasses (e.g., cheatgrass) and other invasive plants such as Russian thistle (Salsola tragus) as well as erosion. Human impacts can be harder to control because people prefer to walk and drive in open areas that depend on BSCs for stability (Belnap et al. 2001). The first sentence of this paragraph is factually incorrect. Healthy BSC can not exist and can not play its foundational ecosystem role in the face of any significant level of damage, due to the decades it requires, without any disturbance, to recover. Slightly less damage is not compliant with the BLMs protect and restore mandate. But just for arguments sake, lets assume BLMs false statement were true. Is the BLM proposing to limit soil impacts to when crusts 1) are less	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs)), DATA02- Inadequate Methodologies	Revised language in Appendix N, Chapter 2, Chapter 3 and Appendix G includes managing for the standards for rangeland health that includes soil stability and BSC as an indicator. The Proposed Plan outlines that the agencies would prioritize the review and processing of grazing permits and leases, including reassessing stocking levels, seasons of use, and management approach to protect BENM objects.

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			susceptible to damage and 2) when conditions are best for recovery? No. Table 3-140 provides the periods of use for each allotment in BENM. Most of the allotments are grazed between 6 and 10 months per year which of course is not when BSC is less susceptible. But BSC is destroyed by disturbance at any time of the year. How about when conditions are best for recovery? BSC takes decades with no disturbance to recover, so it makes no difference whether the livestock are not on the allotment 2 months or 6 months out of the year, that short period is way too short for any recovery to occur. So the first sentence is misleading and disingenuous at best. Is the BLM proposing to continue livestock grazing which it admits is always detrimental to soil crusts complying with its protect and restore mandate under FLPMA 302 (a) and the Proclamations? Of course not.		
14767-19	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We provide as attachments, various papers on BSC issues: 1) Kleiner and Harper 1972 finding 7 times the BSC in ungrazed areas than previously grazed areas. This has obvious application to compatibility analyses for discretionary uses like livestock grazing. 2) Evans and Belnap 1999 finding major degradation and loss of nitrogen fixing in areas where BSC has been reduced by livestock grazing 3) Dunaway et al 2019 finding major reductions in BSC and soil stability in grazed areas versus ungrazed 4) Belnap et al 2009 find 9 fold increase in erosion in grazed versus ungrazed areas due to loss of BSC 5) Concostrina-Zubiri et al finding at least 30 years of livestock removal for functional recover of BSC 6) Root et al Grazing disturbance promotes exotic annual grasses by degrading soil biocrust communities 7) Warren and Eldridge 2001 discusses the incompatibility of BSC and livestock grazing 8) Warren et al 2018 concluded For the greatest ecological and economic benefit, we suggest that efforts should focus on minimizing the scope and scale of unnecessary [i.e. discretionary] anthropogenic disturbance to BSC communities.	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs)), DATA03-Suggest Additional Data Source	References were reviewed and relevant data was added to the Soil Resources section.
18238-3	Chaitna Sinha		We propose: The data collected on BSC result in a map with associated shapefiles that are made available to the public that include BSC cover and distribution to be utilized in the planning of all surface-disturbing projects across the Monument where BSC occurs.	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs)), ALT05-Alternative E	A map showing soil ratings has been added to the RMP/EIS. Thank you for your comment. Under the Proposed Plan, agencies, in collaboration with the BEC, would identify areas with BSCs and classify those crusts to best protect them. The agencies have collaborated with the BEC and will continue with what was analyzed in the alternatives for this action and not incorporate that a map and shapefiles are required. This information may be made available outside of being required by a RMP management action.
18238-5	Chaitna Sinha		Prior to treatment, salvage biological soil crust for restoration post-treatment.	SOILS03-Sensitive Soils (includes Biological Soil Crusts (BSCs)), ALT05-Alternative E	Future management actions would be subject to site-specific NEPA that would include consideration of alternatives and any appropriate mitigation, which may include biological soil crust salvage as detailed in the Best Management Practices.

Table U-26. Traditional and/or Ecological Knowledge

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
7503-1	Thomas Nieland		Please help save our precious dwindling wildlife and habitats, consult Native Americans for best practices!	TIK01-Traditional Ecological or Indigenous Knowledge	The Proposed Plan creates a framework to ensure Traditional Indigenous Knowledge helps guide the management of Bears Ears National Monument. See the Overarching Management section of Chapter 2.
11514-1	George Wuerthner		I am particularly alarmed that the entire document defers to TEK for BENM without ever giving specific examples or how that might affect BLM management. How does TEK influence say climate change or livestock grazing in the monument. Without specifics, it is impossible to judge whether TEK is a valuable addition or perhaps leading to degradation of the monument objects. TEK must meet scientific rigor. If you are going to implement TEK it must be back up by scientific document, not "oral history" or some other source that is impossible for anyone to test or examine.	TIK01-Traditional Ecological or Indigenous Knowledge	Traditional Ecological Knowledge and Traditional Indigenous Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. As stated in Chapter 3, Traditional Indigenous Knowledge is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives.
14767-175	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.3.1: Incorporation of Traditional Indigenous Knowledge in Monument planning and in the disclosure and evaluation of the potential environmental impacts of BENM management alternatives is expected and was fully mandated at the Monuments inception and restoration. But the EIS and DRMP are entirely silent as to what this TIK is or how its implemented into management. So according to this, TIK has been fully implemented in the DRMP and EIS but we dont know what the TIK is or how its being implemented. One seriously suspects that the BLM has no idea what this TIK is and is just trying to hide its ignorance. NEPA does not allow for that.	TIK01-Traditional Ecological or Indigenous Knowledge	Traditional Indigenous Knowledge is defined and its application to the document as an epistemology to be considered in combination with Western Science is presented in the Traditional Indigenous Knowledge and the Bears Ears Landscape section in Chapter 3.
14767-176	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	It is the common goal of creating order from direct observations of natural phenomena that connects Traditional Indigenous Knowledge and Western science. Creating a myth that some god is crying when it rains or the earth is flat creates order from direct observations of natural phenomenon but it doesnt make them true or factual or appropriate for the management of our public lands.	TIK01-Traditional Ecological or Indigenous Knowledge	Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. Traditional Ecological Knowledge, just as Western Science, is simply a method for generating knowledge. As stated in the Traditional Indigenous Knowledge and the Bears Ears Landscape section in Chapter 3, Traditional Indigenous Knowledge is considered in combination with Western Science.

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14779-1	Raymond Monaghan		The Monument's lands, waters, and resources must be managed sustainably. Integrating Traditional Indigenous Knowledge (TIK) and Traditional Ecological Knowledge (TEK) into the management plan is essential to safeguarding the biodiversity and health of the Monument for future generations. This step is crucial in recognizing Indigenous sovereignty, demonstrating respect for the profound relationship Indigenous communities have with the land. Indigenous land practices, such as controlled fires and forest gardens, consistently show us that their methods nurture and restore the environment rather than deplete it.	TIK01-Traditional Ecological or Indigenous Knowledge	The Proposed Plan was developed in collaboration with the BEC and Tribal Nations to incorporate Traditional Indigenous epistemologies.
14887-3	Jeanine Center		The lands, waters, and resources of Bears Ears National Monument deserve to be sustainably managed. Incorporating Traditional Indigenous Knowledge (TIK) and Traditional Ecological Knowledge (TEK) into the management plan is critical to protect the biodiversity and health of the Monument for generations to come.	TIK01-Traditional Ecological or Indigenous Knowledge	All alternatives were developed in collaboration with the BEC and Tribal Nations to incorporate Traditional Indigenous epistemologies.
15961-1	Meagan Sanders		To naturally preserve the biodiversity of the Monument, both Traditional Indigenous Knowledge (TIK) and Traditional Ecological Knowledge (TEK) must be incorporated into the management plan.	TIK01-Traditional Ecological or Indigenous Knowledge	All alternatives were developed in collaboration with the BEC and Tribal Nations to incorporate Traditional Indigenous Knowledge.
1759-1	Dale Becker		Incorporating Traditional Indigenous Knowledge (TIK) and Traditional Ecological Knowledge (TEK) into the management plan is critical to protect the biodiversity and health of the Monument for generations to come.	TIK01-Traditional Ecological or Indigenous Knowledge	The Proposed RMP/Final EIS was developed in collaboration with the BEC and Tribal Nations and incorporates Traditional Indigenous Knowledge and Traditional Ecological Knowledge throughout.
1761-1	Maggie Hohle		Incorporating Traditional Indigenous Knowledge (TIK) and Traditional Ecological Knowledge (TEK) into the management plan is critical to protect the biodiversity and health of the Monument for generations to come.	TIK01-Traditional Ecological or Indigenous Knowledge	The Proposed Plan was developed in collaboration with the BEC and Tribal Nations.
1800-1	Richard Ellison 8003 28th Ave NE Seattle, 98115		I support co-management and the application of Traditional Indigenous Knowledge to optimize the management of the Bears Ears National Monument landscape.	TIK01-Traditional Ecological or Indigenous Knowledge	The Proposed Plan was developed in collaboration with the BEC and Tribal Nations. Moreover, the Inter-Governmental Cooperative Agreement between the agencies and the BEC establishes protocols for collaboration between the parties that would facilitate integration of Western Science and Traditional Indigenous Knowledge for all resource management actions.
1851-1			I support co-management and the application of Traditional Indigenous Knowledge to optimize the management of the Bears Ears National Monument landscape and appreciate that the draft plan allows for the continued use and maintenance of existing climbing routes in the monument.	TIK01-Traditional Ecological or Indigenous Knowledge	All alternatives were developed in collaboration with the BEC and Tribal Nations. Moreover, the Inter-Governmental Cooperative Agreement between the agencies and the BEC establishes protocols for collaboration between the parties that would facilitate integration of Western Science and Traditional Indigenous Knowledge for all resource management actions.
504-1	William Jones 426 Monte Vista Rd. Golden, CO 80401		I strongly support the adoption of Alternative E for the management of Bears Ears. It is incredibly important to prioritize indigenous voices and systems of knowledge when managing lands in the United States, as indigenous people have been successfully managing the North American landscape for thousands of years and understand it better than anyone else. Without indigenous people managing and taking part in North American ecosystems, those ecosystems simply are not whole. Indigenous-led conservation methods are important to all within a landscape, because they work to cultivate meaningful relationships with the land, furthering the well-being of ecosystems, the climate, and human beings. By recognizing indigenous ways of knowing as legitimate, and by employing them in land management, we make the best choice for the health of the Bears Ears ecosystem, and for any person who interacts with it. Additionally, choosing Alternative E sets a historic precedent for future management of public lands that we all benefit from. Again, I strongly urge you to select Alternative E.	TIK01-Traditional Ecological or Indigenous Knowledge	All alternatives were developed in collaboration with the BEC and Tribal Nations.
7553-3	Benjamin Smith		The lands, waters, and resources of the Monument should be sustainably managed using Traditional Indigenous and Ecological Knowledge to protect its biodiversity for future generations.	TIK01-Traditional Ecological or Indigenous Knowledge	The Proposed Plan creates a framework to ensure Traditional Indigenous Knowledge helps guide the management of Bears Ears National Monument. See Chapter 2 of the Proposed Plan.
7588-1	Steven Semken		The lands, waters, and resources of the Monument should to be sustainably managed in a way that also incorporates Indigenous knowledges.	TIK01-Traditional Ecological or Indigenous Knowledge	All alternatives were developed in collaboration with the BEC and Tribal Nations.
8677-14	Jason Cryan, Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 2-13, section 2.4.4.1, first item: NHMU suggests modifying this sentence slightly to say Protect, preserve, and manage scientifically significant paleontological resources in BENM in collaboration with the BEC and Traditional Indigenous Knowledge to be consistent with the requirements of PRPA.	TIK01-Traditional Ecological or Indigenous Knowledge	The agencies considered the suggestion. The Proposed Plan was not modified in Chapter 2. The language in the Proposed Plan is general and will account for the commenter's suggestions. The agencies are required to follow federal laws, such a PRPA. See Appendix B for the list of laws and regulations that the RMP/EIS has considered.
8677-9	Jason Cryan Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	Pg 3-17, paragraph 1: This statement should be modified to include qualified paleontologists so that it reads would rely on BLM-supported or USDA Forest Services supported community engagement and education on the preservation of the resource, along with collaboration with qualified paleontologists, the BEC, and holders of Traditional Indigenous Knowledge regarding the values of these resources.	TIK01-Traditional Ecological or Indigenous Knowledge	Thank you for your comment. Changes have been made to the Proposed Plan.
8976-2	Steven Concho P.O. Box 309 Acoma, NM 87034,Randall Vicente P.O. Box 309 Acoma, NM 87034Aaron Sims 317	Pueblo of Acoma; Pueblo of Acoma; Pueblo of Acoma	To improve the current DEIS, we propose an approach to integrating cultural resource assessments and management actions. The incorporation of Traditional Ecological Knowledge (TEK) into the RMP/DEIS is crucial and needs to be more explicit in subsequent management frameworks and actions. TEK brings a holistic understanding of complex systems and as recognized by the	TIK01-Traditional Ecological or Indigenous Knowledge	All alternatives were developed in collaboration with the BEC and incorporate the Traditional Indigenous and Ecological Knowledge of Tribal Nations. See the Proposed Plan for how Traditional Indigenous and Ecological Knowledge would be incorporated into the management of BENM. Moreover, the Inter-Governmental Cooperative Agreement between the agencies and the BEC establishes protocols for

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
	Commercial St. NE, SUITE 102 Albuquerque, NM 87102		Department of the Interior's policies, should not be separated from its cultural, social, place-based, and ecological contexts. As detailed in the DOI Department Manual 301 DM 7, there is a recognized need to actively incorporate and protect sensitive traditional knowledge. This manual emphasizes the respect and equitable promotion of Indigenous Knowledge in decision-making, resource management, and other actions. Throughout the RMP, the BLM must ensure Indigenous knowledge, including TEK, is incorporated into management practices and areas. As an example, management activities that impact resources such as air quality or water, may have significant cultural resource impacts that can only be understood through the collaborative incorporation of traditional knowledge. This aligns with Acoma's values and approach to resource management: for Acoma, all ancestral pueblo archaeological resources are cultural resources, but not all cultural resources are archaeological in nature. This concept underscores the need for the agencies to meaningfully consider TEK, or Indigenous Knowledge, in all aspects of its management of the BENM.		collaboration between the parties that would facilitate integration of Western Science and Traditional Indigenous Knowledge for all resource management actions.
9096-3	Josie Caringí		Tribal nations have inhabited and 'managed' this land for thousands of years prior to the involvement of U.S. federal government agencies. Because of this, tribal nations have extensive ancestral knowledge and deep cultural and historic ties to this area. Both of these things should be considered and respected in any management plan.	TIK01-Traditional Ecological or Indigenous Knowledge	All alternatives were developed in collaboration with the BEC and Tribal Nations to incorporate Traditional Indigenous Knowledge. The Proposed Plan in the Cross-Cultural Education and Outreach section in Chapter 2 further discusses the incorporation of Traditional Indigenous Knowledge in BENM management.
9189-14	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	While I think tribes should have input like other Americans, it is problematic to raise their wishes above those of other citizens. It is also problematic to deflect to Traditional Ecological Knowledge (TEK) for BENM activities without defining the parameters involved. I can understand the use of medicinal plants and food plants, pinyon nuts etc., but I have seen no scientific evidence of the use of cultural burning, livestock grazing or other TEK. You must define each practice to be used, where and how it will be used, access for its use, and validate its use by comparisons to the scientific literature. This is also a problem in regards to NEPA. You can't satisfy the hard look requirement without taking a hard look. This means analyzing each traditional practice, its history of application, its effectiveness, and the scientific evidence that supports it. Otherwise, it fails the NEPA test in many ways. Without defining each of these practices you cannot analyze environmental impacts, or cumulative effects.	TIK01-Traditional Ecological or Indigenous Knowledge	Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. Traditional Ecological Knowledge, just as Western Science, is simply a method for generating knowledge. As stated in the Traditional Indigenous Knowledge and the Bears Ears Landscape section in Chapter 3, Traditional Indigenous Knowledge is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives. This RMP/EIS informs the decision of how Traditional Indigenous and Ecological Knowledge would be incorporated in management of the Monument; incorporation of Traditional Indigenous and Ecological Knowledge in implementation level projects will be analyzed in site-specific NEPA.
F1-2			Incorporating Traditional Indigenous Knowledge (TIK) and Traditional Ecological Knowledge (TEK) into the management plan is critical to protect the biodiversity and health of the Monument for generations to come.	TIK01-Traditional Ecological or Indigenous Knowledge	As described in the Traditional Indigenous Knowledge and the Bears Ears Landscape section of Chapter 3, the proposed management in RMP/EIS includes information from Traditional Indigenous Knowledge. Following future coordination with the BEC and where appropriate, relevant Traditional Indigenous Knowledge will be specified and analyzed in project-level NEPA analysis.
18238-12	Chaitna Sinha		We propose: The following additions to Alternative E (in bold) and provisions from Alternative D (underlined): Vegetation management throughout BENM will be done in collaboration with the BEC and emphasize and prioritize Traditional Indigenous Knowledge and techniques, light-on-the-land methods, and/or natural processes for vegetation management, including consideration of impacts on wildlife species habitat. Mechanical methods for vegetation management will be used only when necessary to protect BENM objects, and only if the priority methods are shown through tangible documentation to be impractical and ineffective for the protection of those objects. [see letter for emphasis]	TIK01-Traditional Ecological or Indigenous Knowledge, ALT05-Alternative E, HABVEG01-Vegetation	Under all action alternatives, agencies would coordinate with the BEC to incorporate Traditional Indigenous Knowledge into vegetation management (see Management Actions Common to All Resources and All Alternatives in Chapter 2). The Proposed Plan would use light-on-the-land techniques throughout BENM wherever practicable and mechanical methods would be allowed if consistent with the protection of BENM objects.
18238-87	Chaitna Sinha		We propose: Because Proclamation 9558 specifically identifies the importance of TIK itself, [as] a resource to be protected and used in understanding and managing this landscape sustainably for generations to come, restorative justice for BENM demands the adoption of Alternative E, which requires that lands be managed to protect and restore BENM cultural resources, which could increase the nonmarket value associated with traditional, cultural, and spiritual uses and resources, especially for the Tribes. DEIS, Vol. 1, p. 3-370.	TIK01-Traditional Ecological or Indigenous Knowledge, ALT05-Alternative E	The Proposed Plan was developed in close collaboration between the agencies and the BEC.
824-1	Caitlin Fong		Alternative E incorporates the leadership and Traditional Knowledge of the Indigenous peoples whose ancestors successfully stewarded these lands and resources for thousands of years. As a result, the plan reflects time-tested best practices for land management, protects biodiversity and balances sustainable access for all. Additionally, rather than negatively impact recreation, Alternative E represents a responsible approach to conserving ecological and cultural resources by taking a holistic approach to resource management, which is crucial for the future management of all public lands.	TIK01-Traditional Ecological or Indigenous Knowledge, ALT05-Alternative E	The Proposed Plan incorporates a process to ensure Traditional Indigenous Knowledge helps inform the management of Bears Ears National Monument. See the Management Actions Common to All Resources and All Alternatives section of Chapter 2 to see how collaboration will occur with Tribal Nations and the Bears Ears Commission.
8677-5	Jason Cryan Tyler Faith	Natural History Museum of Utah; Natural History Museum of Utah	pg 1-10: The main guidance throughout the Resource Management Plan draft is combining information from Traditional Indigenous Knowledge and a Western Scientific approach. Given this, there should be more discussion about how these two approaches will need to communicate and produce workable practices. For example, the identification of culturally important plants requires a common nomenclature, which is only possessed by a handful of people. Preliminary exchanges of plant knowledge will be required to achieve cross-cultural understanding of BENM plant resources. Perhaps this is something that could be elaborated on in the Cultural Resource Management Plan, which under Alternative E, is scheduled to be developed within two years (Table 2-13).	TIK01-Traditional Ecological or Indigenous Knowledge, ALT07-Modification of Existing Alternatives	The Inter-Governmental Cooperative Agreement between the agencies and the BEC establishes protocols for collaboration between the parties that would facilitate integration of Western Science and Traditional Indigenous Knowledge for all resource management actions. Additionally, the co-stewardship implementation plan could further define and elucidate the relationship between Western Science and Traditional Indigenous Knowledge.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18677-4	Benjamin Bellorado Tucson, AZ		All the alternatives proposed in the draft management plan outline little space for, or acknowledgement for the efforts of, local archaeological and avocational archaeologists who have worked to protect the area for years and who helped develop the push to designate the monument. Overlooking past and future contributions and perspectives of these groups, whether inadvertently or intentionally, and subsuming these perspectives as just part of the broader efforts by federal land managers to manage the resources and protect monument objects, ignores the importance of the hard work these individuals and groups have made over the years and hinders boarder efforts to make the best management decisions possible for these and other resources in the area. Failure to integrate the research and interpretations of these communities undermines the purpose of the monument designation that aims to bring tribes into the fold as co-managers, because it sends the message that western scientific perspectives will not be given equal ground in the management of the area. Elevating one perspective at the expense of all others is not a sustainable path forward. Please find an inclusive balance. Understanding the human history of the monument and larger region needs to draw upon BOTH traditional Indigenous knowledge AND western scientific knowledge. Western scientists, especially archaeologists, are excited to collaborate with tribes and BEC to generate more accurate and inclusive stories about, and interpretations of the past. Please give us the opportunity to be a part of these efforts and decisions moving forward.	TIK01-Traditional Ecological or Indigenous Knowledge, ARCO1-General	The commentor is correct in noting the important work archaeologists in the region have completed over many decades, and the agencies recognize the importance of archeology to BENM in the cultural resource section of Chapter 2 for the Proposed Plan. It provides guidance and direction on the inclusion archaeological practice that is commonplace in federal programs. There are multiple professional full-time archaeologists between the two agencies at the local offices and a tribal liaison. These archaeologists fulfill an important role for the agencies considering the density, complexity, and public in archaeology in BENM and often work closely with non-federal archeologists on permitting and to ensure that the land management agencies are using the best-available scientific research. The Presidential Proclamations direct the federal agencies to incorporate Traditional Indigenous Knowledge and seek the expertise of Tribal Nations in order to protect BENM objects. The Proposed Plan provides management actions that emphasize the important role of Traditional Indigenous Knowledge and tribal expertise on this living cultural landscape and the separate and individual archaeological sites that make up the landscape.
18713-6	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	Medicine men, women, and spiritual leaders should also be considered in this planning process in a significant way. For example, ceremonially we learned that we forgot the ants and insects and needed to bring them into the conservation equation as we advocated to protect Bears Ears in 2017. It would be important to understand how the medicinal leaders communicate with the land and to find ways to follow and implement their management recommendations.	TIK01-Traditional Ecological or Indigenous Knowledge, CUL02-Traditional, Religious, or Cultural Use	The Proposed Plan was developed in collaboration with the BEC and Tribal Nations. See Appendix O, Consultation and Coordination for a discussion of engagement opportunities with Tribal Nations. The agencies will continue to work with Tribal Nations to seek input on working with Religious Leaders.
572-1	Amanda Perkins		While all alternatives require tribal guidance and recommendations on the development and implementation on management plans and on management of the entire monument it is unclear to what degree the tribal nations will remain involved. I would recommend the utilization of the Tribal Co-Management Database to ensure a robust and sustainable co-management plan. It is evident that the federal government is prioritizing tribal guidance as can be seen by the 2022 Guidance for Federal Departments and Agencies on Indigenous Knowledge, and thus a commitment to tribal involvement at unprecedented levels should be welcomed to serve as a model for other management plans. https://narf.org/comanagement-agreements-s2s/ https://www.whitehouse.gov/wp-content/uploads/2022/12/OSTP-CEQ-IK-Guidance.pdf	TIK01-Traditional Ecological or Indigenous Knowledge, DATA03-Suggest Additional Data Source, ALT07-Modification of Existing Alternatives	The agencies have entered into a Cooperative Agreement with the BEC and Chapter 2 includes management actions describing how the Tribal Nations will remain involved. The agencies seek out the best available data and science to inform decision making through the NEPA process and welcome the public to submit data and new information during planning. Thank you for providing links to data.
18657-29	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	References in these and other passages to Traditional Indigenous Knowledge are tantamount with native religious beliefs. The reference to preserving the cultural and spiritual landscape makes the sanction of native religious beliefs as foundational justification for public land management policy explicit, as the agencies are directly indicating their intent to set policy based on Native American spiritual beliefs, specifically about visual and auditory aesthetics. The RMP is filled with heavy repetition of references to the BENM landscape as sacred, in accordance with the animistic religious beliefs of the relevant tribes which essentially worship the natural environment as divine.	TIK01-Traditional Ecological or Indigenous Knowledge, DECI07-Compliance with other laws and policies	The Proposed Plan and the agencies' interactions with the BEC comply with all applicable laws and regulations. Consistent with Proclamation 10285, the Proposed Plan directs the agencies to collaborate with the BEC on implementation of the management plan and management of the entire Monument. The Proclamations also direct the agencies to include Traditional Indigenous Knowledge and expertise in the management of BENM. Traditional Indigenous Knowledge is not "faith-based." Traditional Ecological (or Indigenous) Knowledge is a separate epistemology, distinct from Western Science, that is treated here as required by Presidential Proclamation 10285. As stated in the Traditional Indigenous Knowledge and the Bears Ears Landscape section in Chapter 3, Traditional Indigenous Knowledge is considered in combination with Western Science and the perspectives of both inform both the range of alternatives presented and the analysis of impacts of those alternatives.
18998-2	Joseph L. James	Yurok Tribe	The years of tireless work and collaboration between the Bears Ears Commission, Bureau of Land Management (BLM), and the U.S. Forest Service (USFS), which culminated in this plan, represent a pivotal shift in federal-Tribal co-stewardship that is long overdue. As the first national monument proposed by a coalition of Tribal Nations, Bears Ears is unprecedented, and the plan for managing its lands and resources must reflect that Tribal role to an equal degree. We urge you to leverage your leadership and support the sovereign rights of the Bears Ears Commission Tribes and the key contributions they've made to the management of Bears Ears National Monument in this plan. A few of these contributions include a Tribally authored NEPA alternative based on Traditional Indigenous Knowledge which reflects a more holistic approach to managing ancestral homelands, concrete management actions like monitoring and adaptive management to ensure that future decisions regarding the health of our regional land scapes and sacred places are informed by traditional and western scientific data, and increased understanding and models on how TIK can be incorporated into other models of management more broadly.	TIK01-Traditional Ecological or Indigenous Knowledge, PUBL02 - Bears Ears Commission	Consistent with Proclamation 10285, the Proposed Plan directs the agencies to coordinate with the BEC on implementation of the management plan and management of the entire Monument. Proclamation 10285 re-establishes the BEC and directs the agencies to meaningfully engage with the Commission, including through the planning process, in order to ensure that management decisions affecting the Monument reflect expertise and traditional and historical knowledge of Tribal Nations.

Table U-27. Vegetation and Terrestrial Habitat

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19026-33	Brian Carlstrom	National Park Service	2-27 4 Vegetation Consider climate change when choosing species and genotypes for seed mixes. Consider regionally native species (may not be currently present in BENM) and genotypes from hotter/lower areas to anticipate future climate in selecting seed for project work.	HABVEG01	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
15381-21	Sagebrush Habitat Conservation Fund		There is little consideration of the concept of biodiversity and ecological health. Given the emphasis in the Proclamation for landscape integrity, traditional cultural use, biodiversity should be a major issue in the plan. We know that over large expanses of the Colorado Plateau livestock grazing has reduced biodiversity, particularly among cool season bunch grasses, perennial native forbs, and palatable shrubs. The loss of these plants reduces ecological health in the plant community and its associated populations of birds, small mammals, and reptiles. All these components are critical to the ecological health of the landscape and important to traditional cultural uses.	HABVEG01-Vegetation	The Goals and Objectives of the Vegetation Section in the Proposed Plan states that the agencies will manage applicable vegetation types for multiple successional stages to provide for a high level of vegetative diversity and productivity. Text was added to Chapter 3 to describe the importance of plant diversity on ecosystem functioning.
1900-2	Dennis Hochwender 452 Bismarck Street Grand Junction, CO 81504		Take a drive down the road to Cigarette Springs which is Road Canyon Wilderness Study area. The native plants are decimated for hundreds of yards around every water tank the ranchers place for cattle. The roads and slick rock areas are covered in manure. Any drainage that has water typically runs pee yellow. Invasive weeds are abundant now that the native ones have been beat down.	HABVEG01-Vegetation	The best available date were used in the preparation of the analysis contained in the RMP/EIS. The vegetation and noxious weeds analyses utilized the BLM's Assessment, Inventory, and Monitoring (AIM) data to describe current conditions and potential impacts to vegetation and soils.
14767-14	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	A table needs to be added to the EIS displaying the ESDs by acres. What this table would show is that the vast majority of acres are PJ HCPC.	HABVEG01-Vegetation	The Natural Environment section of Appendix N of the RMP/EIS displays two tables, one with LANDFIRE vegetation classes and one with Ecological Site Groups with acreage in the Planning Area. The Soils and Biological Crusts section of Appendix N of the RMP/EIS displays Soil Map Units with acreage in the Planning Area. The LANDFIRE table shows that Pinyon-Juniper Woodland and Pinyon-Juniper Shrubland make up 33% and 13% of the Planning Area respectively.
14767-171	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The use and perpetuation of native species will be emphasized; however, when restoring or rehabilitating disturbed or degraded rangelands, nonintrusive, nonnative plant species are appropriate for use where native species a) are not available, b) are not economically feasible, c) cannot achieve ecological objectives as well as nonnative species, and/or d) cannot compete with already established nonnative species. The use of non-native seed is degradation of objects by definition. The only reason seeding is a normal and necessary part of BLM management is because the BLM allows strip mining of the vegetation by livestock. A healthy, functional ecosystem never needs seeding.	HABVEG01-Vegetation	Seeding can be and is used for a wide variety of purposes including restoration after various disturbances (natural and human-caused), erosion control, and to control invasive species as described in Chapter 3 and Appendix N of the Draft RMP/EIS.
14767-177	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.1.2.2, we see: Vegetation management actions may impact paleontological resources. Vegetation removal can increase erosion and exposure of underlying paleontological resources in the area. Additionally, vegetation treatments that use heavy machinery, such as drill seeding, chaining, or mastication, can destroy unknown paleontological resources. So, we find the BLM openly admitting that their authorized actions with degrade and destroy objects they are mandated to protect and restore. This again demonstrates that BLM is applying their usual multiple use framework, to lands that are exempted by statute from that framework.	HABVEG01-Vegetation	The Proposed Plan includes a range of methods that can be used for vegetation management (see the Vegetation section). Vegetation in BENM would be managed consistent with the protection of BENM objects, including paleontological resources. Under the Proposed Plan, light-on-the-land techniques would be used throughout BENM wherever practicable. For the implementation of projects, environmental analysis will be completed and will consider paleontological resources.
15761-4			Use only native plants in grazing ranch restorations. Native plants are more resilient than crested wheat grass. Ranchers across the west are experiencing with extreme weather events, native grasses hold the soils in place better.	HABVEG01-Vegetation	The Proposed Plan would prioritize using native seeds for restoration based on availability, adaptation, and probability of success.
15980-4	Payton Halls		One of your Goals and Objectives under grazing states: Manage grazing to minimize or eliminate intrusion of nonnative grass and plant species due to grazing-related activities. My family members have personally witnessed the intrusion of a nonnative, invasive weed onto their grazing permits since the creation of the Bears Ears Monument. How is this goal going to be achieved and enforced with so many more people coming to the area? The grazing of domestic livestock does not enhance the intrusion of nonnative plants, but the addition of more vehicle and foot traffic certainly does.	HABVEG01-Vegetation	The impacts of grazing, recreation, and travel and transportation on invasive plant introduction and spread is discussed in Chapter 3 of the Draft RMP/EIS. The Goals and Objectives of the Livestock Grazing section says that the agencies will implement livestock grazing management practices to meet standards for rangeland health, and invasive plants are an indicator.
1792-2	Ann Wain		In particular, please consider: Barring mechanical treatments for vegetation management. Protecting old-growth trees.	HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
18082-56	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	We recommend against the use of chaining to remove pinyon-juniper because it increases sedimentation, has the potential to destroy beneficial vegetation such as sagebrush, grasses, and forbs, and destroys biological soil crusts. This can impact aquatic resources, promote opportunistic weed and invasive species growth which can increase wildfire potential and severity, and impact wildlife species. Therefore, we recommend the selected alternative prohibit the use of this mechanical vegetation treatment within BENM in order to protect Monument ROVs.	HABVEG01-Vegetation	The Proposed Plan would prohibit chaining throughout BENM.

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18082-58	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	On page 3-103, the Draft EIS lists the issues it considered for the analysis of environmental consequences of the proposed alternatives on terrestrial habitat and vegetation resilience and conservation. With regard to one of the issues, How would existing and proposed management prescriptions (such as those made for livestock grazing, recreation, and lands and realty actions) and discretionary uses affect terrestrial vegetation, including special status plant species?, we recommend clarifying the discretionary uses to which this issue refers.	HABVEG01-Vegetation	The Terrestrial Habitat and Vegetation Resilience and Conservation issues statements were updated to clarify the issue statement and provide examples of discretionary uses applicable to terrestrial habitat and vegetation.
18113-4	Jerry DiMarco Bozeman, MT		Does deviation from vegetation condition class refer to the original (pre Tribal Nation) ecosystem conditions?	HABVEG01-Vegetation	Vegetation Condition Class refers to data created by the USGS LANDFIRE database which classifies areas based on their departure from simulated historical fire regimes and vegetation conditions.
1826-6	George and Frances Alderson 112 Hilton Ave. Catonsville, MD 21228		Vegetation management: We favor restoration projects such as removal of non-native russian olive and tamarisk. The agencies should support volunteer groups that have been restoring the riparian habitat areas of BENM, such as the Bears Ears Partnership. The new plan should bar the use of mechanical vegetation projects such as chaining or mastication. In our travels over the past 50 years we have seen the results of such projects in Washington County, in Tooele County and in Box Elder County. They are diametrically opposed to the values for which BENM was designated. Wildlife habitat was gone and would take years to recover. The plan also should bar the use of non-native species in restoration projects.	HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management. Under all alternatives, agencies would coordinate with the BEC and Tribal Nations to control the spread of invasive and non-native plants.
2015-2	Thomas La Point		I am also opposed to timber operations in the area, but if they must be approved there should be no clearcutting and the cut should be seeded in native seed stock	HABVEG01-Vegetation	Under the Proposed Plan, clearcutting for timber harvest would be prohibited. Restoration would prioritize native seed based on availability, adaptation, and probability of success.
3125-19	Steve Knox		Page 2-26, Vegetation, Table 2-6, 1st action, Alternative E This action states mechanical methods for vegetation management would only be used when necessary to protect BENM objects. That would not be consistent with management of wilderness values and characteristics when those objects are located in LWC, WSAs, Wilderness, and IRAs. Please clarify. Page 2-27, Vegetation, Table 2-6, 1st action, Alternative E Same comment as comment above.	HABVEG01-Vegetation	Under the Proposed Plan, vegetation treatments in designated wilderness would comply with regulatory requirements, require a Minimum Requirement Analysis, and would use the minimum tool required to maintain the wilderness character. Wherever practicable, vegetation management would use light-on-the-land techniques throughout the entire BENM.
3125-20	Steve Knox		Page 2-29, Vegetation, Table 2-6, 2nd 2008 Monticello RMP action, Alternative E This action proposes coordination with BEC when maintaining and designing vegetation treatment. I agree, but it also requires consideration of and consistency with other resource values e.g. LWC, WSAs, Wilderness, IRAs, et al. Page 2-29, Vegetation, Table 2-6, 2nd 2020 ROD/MMP action, Alternative E Yes, but these actions must also be conducted using suitable wilderness tools/methods Minimum Tool Analysis.	HABVEG01-Vegetation	Under the Proposed Plan, vegetation treatments in designated wilderness would comply with regulatory requirements, require a Minimum Requirement Analysis, and would use the minimum tool required to maintain the wilderness character. Wherever practicable, vegetation management would use light-on-the-land techniques throughout the entire BENM. Implementation of management actions that may be authorized or carried out by the agencies to meet proposed management goals or authorize site-specific uses would require action-specific analysis of potential impacts on vegetation and all BENM objects.
3125-7	Steve Knox		Page 2-25, 2.4.7, Vegetation, Table 2-6, Management Actions Common to All Alternatives, 4th bullet While removal of invasive species from riparian zones would be desirable in LWC, WSAs, IRAs, and Wilderness, what methods would be used that are compatible with managing for wilderness characteristics and values non-motorized and non-mechanized methods? You should identify the proposed methods for public disclosure and analysis purposes.	HABVEG01-Vegetation	The agencies would evaluate and determine site-specific vegetation management actions for removal of invasive species through implementation-level planning, at which point implementation-level environmental analysis would disclose both specific intent and process for achieving objectives. Under the Proposed Plan vegetation treatments in designated wilderness would comply with regulatory requirements, require a Minimum Requirement Analysis, and would use the minimum tool required to maintain the wilderness character.
8946-1	Rudolf Lambrechtse		I strongly oppose mechanical treatments by the BLM. I have seen the damage done by overgrazing and the lack of supervision and prevention of destruction of riparian areas.	HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
9372-11	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	There are some counterproductive suggestions on page 33 when the draft reads, No chaining would be allowed in the Monument and treatments authorized in special designation areas would use light on the land methods. This reduction in allowable mechanical vegetation treatments would likely result in short-term improvements in vegetation due to the lack of surface disturbance often associated with mechanical treatments. The statement of short-term improvement is probably the only true part of this claim treatments would reduce surface disturbance, but it would result in negative impacts in the long term. Chaining improves soil health. Removing excess vegetation allows nutrients to replenish the soil, making it easier for new plants to grow and thrive. Overgrown plants can also promote weeds and other undesirable plant growth. It also provides enhanced safety. The management draft plan expresses the importance of fire safety and protecting the community and area from wildfire.	HABVEG01-Vegetation	Chaining would be allowed in BENM under Alternative B. Since this is included in the analyzed range of alternatives, no changes to the alternatives were made.
12732-5	Patricia Becnel		8. Absolutely no mechanical removal of vegetations. 9. Use native seeds where possible .	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in the Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See Chapter 3 for discussion of impacts related to mechanical treatments for vegetation management.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
1293-4	Janet Kahan		Improve how the monument manages plants, trees, and vegetation under Alternative E prohibit what the Bureau of Land Management calls mechanical vegetation treatments, allow only native seed in restoration projects, and immediately protect old-growth trees	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in the Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See Chapter 3 for discussion of impacts to vegetation and cultural resources, respectively, from vegetation management.
1327-2	Seth Roseman		In adopting Alternative E for the final plan, I ask that you refine it to prohibit mechanical vegetation management treatments, including clearcutting, mandate the use of only native seeds in restoration projects, and enact immediate protections for old-growth trees. Extensive damage has already been inflicted on cultural sites, soils, and native vegetation due to decades of destructive vegetation treatments in the region, and now is the time to embrace a new approach.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in the Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See Chapter 3 for discussion of impacts to vegetation and cultural resources, respectively, from vegetation management.
1383-3	southern Utah resident		Improve how the monument manages plants, trees, and vegetation under Alternative E Many places in Bears Ears have been altered by heavy-handed clearcuts of pinyon and juniper forests and the wholesale replacement of native plants with exotic pasture grasses, mostly for the benefit of livestock at the expense of the environment. These destructive mechanical treatments represent a bygone era where extensive damage to cultural sites, soils, and native plants was the norm. After decades of these destructive treatments, nows the time to take a new approach. Restoring native plants based on traditional Indigenous knowledge should be the future for Bears Ears. In the final plan, please prohibit what the Bureau of Land Management calls mechanical vegetation treatments, allow only native seed in restoration projects, and immediately protect old-growth trees.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in the Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See Chapter 3 for discussion of impacts to vegetation and cultural resources, respectively, from vegetation management.
1538-1	Susan Ordway		Please adopt Alternative E, with the following improvements. It should bar mechanical treatments for vegetation management including clearcutting. Native seeds should be used in restoration projects, and old-growth trees should be protected.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
15442-2	Jon Guggenheim		There are some elements of Alternative E that could use some refinement. Please stop mechanical vegetative treatments. In addition to the very inconsistent results of these treatments they are highly destructive. These treatments put cultural resources at risk. Use only Native seeds for vegetative treatments and please protect old growth trees.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in the Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See Chapter 3 for discussion of impacts to vegetation and cultural resources, respectively, from vegetation management.
1573-4	Richard Feldman 119 Cherry Ln teaneck, 07666		I support Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management. To best protect sensitive resources and cultural sites, Alternative E should also be modified to prohibit mechanical treatments and commercial timber harvest, and require the use of native seeds for revegetation and reclamation.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
16940-4	Christopher Lish 1004 Los Gamos Road Apt. D San Rafael, 94903		I strongly support Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management. Many places in Bears Ears have been altered by heavy-handed clearcuts of pinyon and juniper forests and the wholesale replacement of native plants with exotic pasture grasses, mostly for the benefit of livestock at the expense of the environment. These destructive mechanical treatments represent a bygone era where extensive damage to cultural sites, soils, and native plants was the norm. After decades of these destructive treatments, nows the time to take a new approach. Restoring native plants based on traditional Indigenous knowledge should be the future for Bears Ears. To best protect sensitive resources and cultural sites, Alternative E should also be modified to prohibit mechanical vegetation treatments, prohibit commercial timber harvest (especially of old-growth trees), and require the use of native seeds for revegetation, reclamation, and restoration projects.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
18238-13	Chaitna Sinha		We propose: The use of nonnative seeds only be approved for emergency actions that call for phased restoration efforts that lead to a native vegetation community. The term emergency actions needs to be explicitly defined. Plans should include a transition to native species as soon as possible. A research component should be included, and the BEC must approve all final seed mixes. As with mechanical methods of vegetation management, Alts D and E state that non-native seeds could be used for vegetation management only when necessary to protect BENM objects. Id., p. 2-27, Table 2-6. While this implies that non-native seed will not be used under normal circumstances, it leaves significant room for exceptions.	HABVEG01-Vegetation, ALT05-Alternative E	Under all alternatives, agencies would collaborate with the BEC when determining appropriate seed mixes. Under the Proposed Plan, native seed would be prioritized in restoration based on availability, adaptation, and probability of success. Where probability of success or adapted seed availability is low, agencies would collaborate with the BEC to identify nonnative, non-GMO seeds that may be used to protect BENM objects.
18238-16	Chaitna Sinha		We propose: To ensure that collaborative management is an inherent part of this plan as intended by the Proclamation, all vegetation management plans and projects should be done in close collaboration with the BEC. This should be explicitly stated in the final plan.	HABVEG01-Vegetation, ALT05-Alternative E	The Management Actions Common to All Action Alternatives section for Vegetation, states that collaboration and coordination with the BEC would occur when identifying and planning vegetation treatment priorities, incorporating Traditional Indigenous Knowledge, controlling the spread of invasive and non-native plants, and protecting culturally important plant communities.
18238-18	Chaitna Sinha		Chapters 2 and 3 are inconsistent regarding the use of non-native seeds in Alternative E. While Table 2-6 says that non-native seeds will only be used to protect Monument objects, Chapter 3 says "...the inability to use nonnative, non-invasive plants may slow restoration and potentially allow for an	HABVEG01-Vegetation, ALT05-Alternative E	Text in Chapter 3 and Appendix N has been changed to be consistent with the Alternatives table.

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			increase in invasive plants." DEIS, Vol. 1, p. 3-127. This statement in Chapter 3 suggests that non-native seeds are entirely prohibited in Alternative E. This is not the case, as we discussed above.		
18486-3	Anne Clare Erickson 329 Hillside Dr Moab, 84532		Next, do not allow mechanical treatments to manage vegetation. Clearcutting and reseeding with non-native seed to create food for livestock not only proves that the livestock shouldnt be there is the first place, but it wholly destroys the native vegetation that is so old it will never recover. It is an archaic practice that should not be allowed. And if there is a project that needs to be managed or restored, only native seed should be used.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
18610-6	Kate Mabry		a. End the clear cuts of juniper forests and pinyon pines and immediately protect old growth trees! Native plants are being replaced by exotic pasture grasses due to livestock. b. Prohibit all mechanical vegetation treatments immediately. c. End the cutting of live trees for fence posts. d. Restore native plants by reseeding	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in the Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See Chapter 3 for discussion of impacts to vegetation and cultural resources, respectively, from vegetation management.
18686-5	Ed And Gisela Gunderson Los Alamos, NM 87544		We support prohibiting mechanical vegetation treatments, protecting old-growth trees, and requiring the use of native seeds for restoration projects.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
18688-1	Ken Fitch		Vegetative management under Alternative E is of major significance, as sacred plants are known often confidentially only to the tribes, and their presence in seasonal existence is directly connected to tribal practices and knowledge. The tribal participation in this alternative becomes essential as this can provide valuable protection for natural processes. The continuing monitoring and assessment by BEC and Agencies in partnering decision making is essential.	HABVEG01-Vegetation, ALT05-Alternative E	In the vegetation section of Chapter 2 it states that all Action Alternatives would include coordination and collaboration with the BEC and Tribal Nations to manage and protect culturally important plants and incorporate Traditional Indigenous Knowledge into vegetation management.
8953-2	Joseph Allen		Alternative E should prohibit the use of mechanical methods for vegetation management. Such sensitive landscapes are permanently damaged when clear-cutting and other machine-dominant techniques are used; i.e., soils erode, sensitive plants are damaged or killed - and the cultural connections these landscape have to the native populations are desecrated in the process.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
9127-5	Adam Auerbach		Prohibition on Chaining Native Vegetation: Support Alternative E's prohibition on chaining native vegetation and ask that the preferred alternative include a requirement to use only native plant species for restoration and post-fire seeding, as outlined in Alternative D.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
9166-3	A BENM supporter		3. Please improve how the monument manages plants, trees, and vegetation under Alternative E Many places in Bears Ears have been altered by heavy-handed clearcuts of pinyon and juniper forests and the wholesale replacement of native plants with exotic pasture grasses, mostly for the benefit of livestock at the expense of the environment. These destructive mechanical treatments represent a bygone era where extensive damage to cultural sites, soils, and native plants was the norm. After decades of these destructive treatments, nows the time to take a new approach. Restoring native plants based on traditional Indigenous knowledge should be the future for Bears Ears. In the final plan, please prohibit what the Bureau of Land Management calls mechanical vegetation treatments, allow only native seed in restoration projects, and immediately protect old-growth trees.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
F13-2			It emphasizes traditional Indigenous knowledge and techniques and natural processes for vegetation management. Consistent with those practices, to protect sensitive resources and cultural sites, Alternative E should also be modified to prohibit mechanical treatments and commercial timber harvest and require the use of native seeds for revegetation and reclamation.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
F4-2			As you adopt Alternative E in the final plan, please refine it so that it bars mechanical treatments for vegetation management including clearcutting, uses only native seeds in restoration projects, and enacts immediate protections for old-growth trees. Extensive damage has already been done to cultural sites, soils, and native vegetation by decades of destructive vegetation treatments in the region, and nows the time for a new approach.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
F6-4			To best protect sensitive resources and cultural sites, Alternative E should also be modified to prohibit mechanical treatments and commercial timber harvest, and require the use of native seeds for revegetation and reclamation.	HABVEG01-Vegetation, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
1610-3	PAUL JORDAN 14089 W Baltic Ave Lakewood, 80228		I feel that Alternative Es emphasis on Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management would be best. I also think that Alternative E could be improved by prohibiting mechanical treatments and commercial timber harvest and requiring the use of native seeds for revegetation and reclamation.	HABVEG01-Vegetation, ALT05-Alternative E, FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
14767-151	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	Even the supposedly most protective alternative, E, provides: Vegetation management throughout BENM would emphasize Traditional Indigenous Knowledge and techniques and/or natural processes for vegetation management, including consideration of impacts on wildlife species habitat. Mechanical methods for vegetation management would be used only when necessary to protect BENM objects. Only native, nongenetically modified (GMO) seeds would be used for revegetation/reclamation unless necessary to protect BENM objects. What is this Traditional Indigenous Knowledge? Unknown. Mechanical methods would be used when BLM fabricates an excuse that its necessary, as it has done repeatedly for bulldozing and the like within the Monument. Again, non-native seeding is fine if the BLM concocts a rationale as to why its necessary. For Alt D, the focus for the BLM, it allows all the degrading and destructive tools the BLM uses on its multiple use lands. For all the action alternative, the BLM proposes: Hazardous fuels reduction treatments would be used to restore ecosystems; protect human, natural, and cultural resources; and reduce the threat of wildfire to communities. In addition to protecting human, natural, and cultural resources, fire and fuels treatments used throughout BENM would be implemented with the goal of returning to natural fire return intervals, historic vegetation conditions, and landscape characters, wherever possible, and be consistent with the protection of BENM objects. Prohibit vegetation treatments and nonstructural range improvements with a primary purpose of increasing forage for livestock. So this is essentially identical to what the BLM does on its multiple use lands. Use the excuse of fire to cut, plow, masticate, etc. What are the FRIs? The EIS doesnt say, so the BLM can simply manufacture whatever FRI is helpful to promote its treatments. As far as the loophole of primary purpose for livestock, that loophole has been exploited for the last 25 years on NLCS lands with similar probations. The BLM simply adds the word wildlife to the beginning of the sentence justifying it and thats that. All alternatives allow the continued use of non-native seeding which by definition degrades Monument objects.	HABVEG01-Vegetation, ALT07-Modification of Existing Alternatives	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management. See the Glossary for the definition of Traditional Indigenous Knowledge. See the Livestock Grazing section of the Proposed Plan.
17573-87	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.7 Vegetation page 2-25 Bullet point 2 should include collaboration with DWR to Manage vegetation to support fish and wildlife habitats.	HABVEG01-Vegetation, ALT07-Modification of Existing Alternatives	Text was added to the Vegetation section of Chapter 2 to include coordination with UDWR and USFWS.
17573-89	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.7.2 Management Actions Common to all Alternatives (page 2-25) DWR recommends that all vegetation management actions aimed at conserving or improving wildlife habitat should be coordinated with the DWR and the WRI partnership alongside the BEC. This should be reflected in all alternatives in Table 2-6. WRI is focused on improving three ecosystem values: 1) watershed health and biological diversity, 2) water quality and yield, and 3) opportunities for sustainable uses of natural resources.	HABVEG01-Vegetation, ALT07-Modification of Existing Alternatives	Text was added to the Vegetation section of Chapter 2 to include coordination with UDWR and USFWS. Coordination with UDWR would encompass coordination with the WRI partnership.
17573-90	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.7.3 Management Actions by Alternative (page 2-26) The DWR supports Alternative A or B (as it relates to this section) in Section 2.4.7.3. Alternative E states that only native seed may be used in restoration projects. The seed restriction could limit vegetation community restoration where noxious or invasive species are present. The DWR recommends flexibility to use non-native seeds where noxious or invasive species are present or when native seed sources are not readily available or cost-prohibitive to restore vegetation communities. Alternative B, C, D, or E, no chaining is allowed. Chaining is cost-effective for treating woody encroachment, especially in some pinyon and juniper communities. The DWR requests the ability to use mechanical and hand treatments, including chaining, when appropriate. Light-on-the-land isnt defined in Vol. 1. If light-on-the-land is interpreted as no heavy equipment, it will likely prevent effective habitat improvements/restoration.	HABVEG01-Vegetation, ALT07-Modification of Existing Alternatives	The Glossary in Volume 2 of the Draft RMP/EIS defines light-on-the-land. Under the Proposed Plan, vegetation management would include a variety of tools including mechanical methods, but not chaining, consistent with the protection of BENM objects. Restoration would prioritize the use of native seeds based on availability, adaptation, and probability of success. Where probability of success or adapted seed availability is low, agencies would collaborate with the BEC to identify nonnative, non-GMO seeds that may be used to protect BENM objects. See the Vegetation section of Chapter 3 of discussion of impacts to BENM objects from chaining.
17573-95	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Weed Free needs to be clarified to ensure that there is a standard for seed in BENM. Commercial seed collection is needed under Alternative D and E to provide propagules for restoration activities.	HABVEG01-Vegetation, ALT07-Modification of Existing Alternatives	The agencies have considered the comment. In the Proposed Plan in the Vegetation section, commercial seed gathering would not be allowed. The Proposed Plan says we will use weed seed free feed in the vegetation section.
17831-2	Christine Jauhola Glade Park, CO 81523	Great Old Broads for Wilderness, Grand Junction Broadband	As the EIS points out, the sagebrush ecosystem is one of the most imperiled ecosystems in North America due to overgrazing, wildfire, and years of management practices to reduce sagebrush cover in favor of forage for livestock. With 50% to 60% of remaining sagebrush ecosystems having altered understories or been lost to direct conversions from catastrophic wildfire, farming, urban development, tree encroachment, and livestock grazing, continued management that allows degradation of sagebrush habitats should not be allowed.	HABVEG01-Vegetation, ALT07-Modification of Existing Alternatives	The Proposed Plan in the Livestock Grazing section include management actions that address grazing impacts on vegetation such as further acres made unavailable to grazing or limited to trailing only and working with the BEC to reassess stocking levels, seasons of use, and management approach. In addition, the Goals and Objectives of Livestock Grazing and Appendix G includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic functions.
17831-3	Christine Jauhola Glade Park, CO 81523	Great Old Broads for Wilderness, Grand Junction Broadband	There have been significant changes to other vegetation types in the Monument for the past several decades, The EIS points out an overall decrease in perennial and annual forb and grass cover and shrub cover throughout the Monument, as well as a decrease in perennial grass and forb biomass.	HABVEG01-Vegetation, ALT07-Modification of Existing Alternatives	The analyzed alternatives include a range of livestock grazing options including a variety of areas closed and open to livestock grazing so no changes to the alternatives were made.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			The continued threat of climate change in an already arid area requires significant management changes to avoid additional habitat degradation. During on-going drought conditions, livestock grazing has a significant detrimental effect on already stressed vegetation. With historic drought conditions, continuing livestock grazing at near current levels, as is projected in Alternatives A, B, C and E, will not allow these fragile ecosystems to heal and may cause perennial grass, forbs, and sagebrush to continue to decline.		
1993-1	Elizabeth Smith		the use of native plants in all landscaping an reclamation efforts is really important. The native plants grow much better than anything brought in from somewhere else and they do a much better job of supporting native animals and insects. I fully support Alternative E and would recommend but, I think it needs added provisions which prohibit mechanical treatments and commercial timber harvest and require the use of native seeds of reclamation and recovery.	HABVEG01-Vegetation, ALTO7-Modification of Existing Alternatives	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
15381-4	Sagebrush Habitat Conservation Fund		2.4.7. Vegetation The goals for vegetation are a bit nebulous. Managing for a range of condition classes is de facto what is happening now. We support the use of ESDs to help establish baseline for condition and productivity. The management actions for vegetation seem to rely heavily on active, human intervention rather than emphasizing natural restoration. Sometimes, all that is needed is to remove the insult or mechanism causing injury and the ecological site can heal and repair itself. This concept is alluded to under Alternative E, but again it is more of a goal statement than a management action. The actions common to all alternatives are exclusively to coordinate and collaborate. How are more meetings an action improving conditions on the rangelands? Livestock grazing is the predominant change agent causing degraded sites and loss of biodiversity. There should be management efforts to change grazing, both stocking rate and season of use to restore healthy conditions.	HABVEG01-Vegetation, ALTO7-Modification of Existing Alternatives, GRAZO1-General	The Proposed Plan in the Livestock Grazing section include management actions that address grazing impacts on vegetation such as further acres made unavailable to grazing or limited to trailing only and working with the BEC to reassess stocking levels, seasons of use, and management approach. In addition, the Goals and Objectives of Livestock Grazing and Appendix G includes managing for the standards for rangeland health for biotic integrity, soil stability, and hydrologic functions.
18713-9	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	Several years of research has also been conducted by the University of Utah and Utah Din Bikyah analyzing the cultural importance of the Four Corners Potato and other plants to local Tribes. These published and unpublished scientific reports were not cited in the BENM DEIS3.	HABVEG01-Vegetation, CULO2-Traditional, Religious, or Cultural Use	Literature has been reviewed and publicly-available information has been added to the Terrestrial Habitat and Vegetation Resilience and Conservation section in Chapter 3.
14767-190	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 3.4.2.1.5 the BLM states that it is relying on AIM plots to determine conditions. Prior to assessing the overall land health at each terrestrial AIM plot, benchmarks were needed for each of the three soil indicators. Benchmarks are indicator values or ranges of values which, when exceeded, indicate departure from desired conditions. Applying benchmarks that describe expected/desired conditions and relate to management goals can aid in the interpretation of data. Benchmark values were established using distributions of indicator values from terrestrial AIM data points sampled within the two level IV ecoregions present within the Monument. Ecoregions are areas that are grouped based on similarity in geology, physiography, vegetation, climate, soils, land use, wildlife, and hydrology Now this may look quite scientific to a casual reader who does not know better. But to explain exactly what the BLM is doing here, they are taking a data set of AIM points, virtually all collected on similarly impacted and degraded lands and then saying if its slightly better than the average of these degraded lands or slightly less bad than these degraded lands then then the area is healthy and in in desired conditions. This would be like taking 100 patients with end stage coronary artery disease, measuring their blood fats and then saying anyone with slightly less blood fats is healthy. This would be a logically absurd method even under the BLMs multiple use management, but these lands are specifically exempted from the multiple use framework by FLPMA 302 (a). So the desired conditions used by the BLM are entirely incorrect and inappropriate for the protect and recover mandate.	HABVEG01-Vegetation, DATA02-Inadequate Methodologies	The objective of the analysis was to identify areas within the Monument with the greatest ecological concern for either making the area unavailable or prioritizing land health assessments and subsequent improvement projects. To do this, AIM data were compared to either the 25th or 75th percentile (not average or median) of the respective ecology of each point. Depending on the strata, each of the AIM points within BENM were compared against hundreds of other observations in similar ecosystems. By using the 25th/75th percentile, areas flagged for departure are identified as being in potentially poor condition and needing immediate attention. For more information, please refer to BLM Tech Note 453 and 455.
14767-10	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	We provide, as attachments, a review and literature on PJ submitted to the recent BLM efforts to establish a CX for PJ killing projects. We also provide two reviews by Jones et al., one from 2012 and the other from 2019. Both of these refute the BLMs contention that PJ needs treatment.	HABVEG01-Vegetation, DATA03-Suggest Additional Data Source	The agencies reviewed the attachments. The agencies in collaboration with the BEC would evaluate and determine site-specific vegetation management actions through implementation-level planning using best available science and Traditional Indigenous Knowledge, at which point implementation-level environmental analysis would disclose both specific intent and process for achieving objectives. The BLM and USDA Forest Service acknowledge that juniper is a native species in the Planning Area and is appropriate for certain ecological sites; however, it can encroach on sites where it is not appropriate and result in a particular site no longer meeting standards.
9255-7	Keith Alleman		Regarding vegetation management, the description is too vague to really understand the practical distinction from other Alternatives. I will say this: vegetation practices should not include the government paying to plant plants just because they are what cattle like to eat. Any reseedling of an area should be based on ecosystem appropriateness and native plants; if someone is trying to graze an area where the native and appropriate vegetation wouldn't be appetizing to cattle, then that's their own bad idea, and indirect government welfare (whether in vegetation selection, range improvements, or otherwise) should not be propping up such an operation.	HABVEG01-Vegetation, GRAZO1-General, ALTO7-Modification of Existing Alternatives	The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. In the Livestock Grazing section of the Proposed Plan management is that new range improvements or modifications to existing range improvements would be prohibited unless the primary purpose is to protect BENM objects. For BLM, a current land health assessment within the last 10 years would be required for new water developments/range improvements, or modifications to existing water developments/range improvements.
3125-16	Steve Knox		Page 2-19, Water Resources, Table 2-5, 3rd 2020 ROD/MMP action, Alternative E What are minimally invasive vegetative treatments? Would this exclude mechanized and motorized vehicles and equipment? For example see Alternative E for the next 2020 ROD/MMP action below. You need this information to consider consistency with and impacts to other resource values and uses, especially LWC, WSAs, IRAs, and Wilderness.	HABVEG01-Vegetation, WATO1-General	In the Management Actions by Alternative section of Vegetation, it states that under Alternative E, mechanical methods for vegetation management would be used only when necessary to protect BENM objects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19026-2	Brian Carlstrom	National Park Service	ES-13 ES-5.1.5 Noxious weeds and nonnative invasive plants Recommend Alternatives B or C, as Alternatives D and E admit that there would likely be a reduction in invasive species treatments, which could result in an increase in the spread of noxious and invasive species over the long-term, which would then spill over park boundaries.	WEED01; YES03	Appendix N, Noxious Weed and Nonnative Invasive Plants section discusses the impacts from various discretionary actions such as recreation and OHV use on the introduction and spread of invasive plants.
15396-1	Kristen Henry		Alternative E reduces the amount of acreage allowed for grazing. Also, chaining will not be allowed. This will help the landscape recover from the negative impacts from years of overgrazing, and hopefully allow native species to return. The invasion of noxious weeds like Russian thistle is a serious problem in so many areas.	WEED01-General	Thank you for your comment.
8305-9	Tracy Bodnar		Conduct invasive plant eradication to control Tamarix, Russian olive, etc. Invasive plants like tamarisk and Russian olive should be removed from washes like Butler, Comb, etc. Willow planting should be added using volunteers or BLM staff.	WEED01-General	The Proposed Plan would manage vegetation to support healthy watersheds and reduce the spread and introduction of non-native species including tamarisk and Russian olive. See the Vegetation section to see the goals, objectives, and management actions related to invasive species.
864-4	Concerned conservationist		How could any harmful invasive plants be prevented, controlled, reduced, or eradicated? Please consider these questions in moving forward.	WEED01-General	The issue statements (Appendix N, Noxious Weed and Nonnative Invasive Plants section) and the Environmental Consequences section analyze the impacts of existing and proposed land use allocation decisions and vegetation management actions on noxious weeds and invasive nonnative plants.
9353-3	Larry Beane		Roads to use these activities also introduce exotic species, provide access for damaging visitor activities such as looting and off roading.	WEED01-General	Appendix N, Noxious Weed and Nonnative Invasive Plants section discusses the impacts from various discretionary actions such as recreation and OHV use on the introduction and spread of invasive plants.
518-1	Tanner Skaare Nick Kemme Andrew Evans Joseph Lanser		A 2008 report on the efficacy of livestock grazing showed that for many of the noxious weed species found in the BENM (listed in table Table 3-29 of the report), cows and goats are similar in grazing control effectiveness of species found in BENM such as canada thistle, quackgrass, yellow starthistle and others (Davison et al., 2006). The use of goats for noxious weed control under Alternative E will cause competition for the limited resources available for cattle, with no evidence suggesting that the use of goats will provide any advantage in noxious weed control over the grazing of cattle. With such a strong focus on minimizing water use pressure for livestock, the use of goats for weed control should be reconsidered.	WEED01-General, ALT05- Alternative E	If any livestock were to be used for weed control, the BLM, USDA Forest Service, and/or BEC would perform the necessary level of environmental analysis and review, including a determination of whether the activity is consistent with the proper care and management of Monument objects prior to approval of any site-specific proposals for weed management. Under the Proposed Plan agencies would collaborate with the BEC on herbicide use or other control methods (i.e., introduced species) as part of vegetation management projects.
544-3	Please don't be cowed by ranchers		The attached report proves the link between livestock grazing and the worsening problem of cheatgrass encroachment and associated fire damage. Please use this information in preparing the FEIS and in revising Alternative E to better respond to grazing related impacts on monument objects.	WEED01-General, CUL01-General, DATA03- Suggest Additional Data Source	The impacts of grazing on vegetation including invasive plants (e.g., cheatgrass) is discussed in, Fuels, Wildlife, and Prescribed Fire, and Terrestrial Habitat and Vegetation Resilience and Conservation. Under the Proposed Plan, management direction would ensure that grazing is managed to meet BLM and USDA Forest Service standards for rangeland health in a manner that is consistent with the protection of BENM objects.
14767-221	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	AMS 6.2 Established weed populations will likely continue to expand, and new weed species will continue to appear in the Planning Area as a result of natural and anthropogenic introductions The primary source of disturbance and invasives spread is livestock grazing, yet the BLM is proposing status quo livestock grazing despite the fact that this leads to more invasive species which does not protect Monument values and objects.	WEED01-General, DATA02-Inadequate Methodologies	Terrestrial Habitat and Vegetation Resilience and Conservation and the Noxious Weeds and Nonnative Invasive Plants section discuss the impacts of livestock grazing on vegetation and invasive plants. See the Proposed Plan under the Livestock Grazing section. The Proposed Plan has multiple management action that are different from the no action alternative in order to protect BENM objects.
15381-14	Sagebrush Habitat Conservation Fund		Water Resources The goal under all alternatives is to protect and restore riparian, wetland, and water resources, including spring sand seeps. While we support and appreciate the goal, the only method offered to achieve it is to mechanically remove tamarisk. The killing tamarisk alone does not result in recovery of riparian and wetlands. It is also important to remove injury causing mechanisms from the system that are damaging native species such as willow and cottonwood and bank stabilizing grasses, forbs, rushes, and sedges.	WEED01-General, WAT01-General	The Water Resources section of the Proposed Plan lists many methods for protecting and restoring riparian, wetland, and water resources including but not limited to limiting recreation where monitoring indicates that the riparian area or water quality conditions are being impacted, reducing woody invasive species where appropriate, not allowing discretionary actions that results in stream channel instability or reduces water quality in 100-year floodplains or within 330 feet of springs, riparian areas, and intermittent and perennial streams. Text was added to the Water Resources section to clarify methods that may be used under each alternative.

Table U-28. Visual and Aesthetic Resources

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
1659-3	Eve Tallman UT		The proposed Visual Resource Management (VRM) overlay is problematic because the proposal for Class I VRM status for the entire Indian Creek corridor (with a slim allowance for the highway) is unrealistic. There is an aim to educate visitors to BENM regarding user impacts, historical interpretation, and responsible stewardship of the area. Providing facilities to manage those impacts such as vault toilets, shade structures, picnic areas, kiosks, signage, hardened parking areas, trail markers, and the like, are necessary to protect monument values and resources. Integrating traditional knowledge into user education at point-of-contact sites is vital. The VRM I designation will make user education and visitor management very difficult. Also, it is difficult to achieve the desired effect of no visual encumbrances in an entire viewshed as proposed by VRM I across the Monument. The Right-of-Way issue of radio and telecommunications towers interfering with the VRM I standards will be difficult to balance. Since the highway can be seen from just about every vantage point within the Indian Creek corridor, this compromises the VRM I status since large vehicles will be visible from	VIS01-General	Under the Visual Resources Section in Chapter 3, VRM Class I was updated to contain WSAs, protected LWC, and Wild and Scenic Rivers. The VRM Class II and Class III areas were also updated and would allow for the sort of infrastructure the commenters points to. Site-specific NEPA analysis would determine appropriateness of specific locations and actions of proposed projects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			far away. Allowing grazing across the vast majority of Remote and VRM I land conflicts with the stated aims, since cattle have non-wilderness impacts and could be considered visual infringements on the landscape.		
17573-74	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, the State requests that the VRM provide enough decision space to allow managers to analyze future vegetation treatment projects that may be needed to protect monument objects and to promote wildlife and livestock grazing. If the VRM is too restrictive, those projects will be delayed well beyond their ability to protect the objects, if not indefinitely.	VIS01-General, ALT07-Modification of Existing Alternatives	Under the Visual Resources Section in Chapter 3, VRM Class I was updated to contain WSAs, protected LWC, and Wild and Scenic Rivers. The VRM Class II and Class III areas were also updated and would allow for the sort of infrastructure the commenters points to. Site specific NEPA analysis would determine appropriateness of specific locations and actions of proposed projects.
17969-15	559 E. South Temple Salt Lake City, 84102	The Nature Conservancy	Visual Resource Management TNC generally supports the broad Class I designation for BLM-administered lands and Very High SIO for USFS lands. As an adjacent landowner, we are concerned about the visual resources of our private property, and this would preserve the existing outstanding scenic qualities of the landscape and retain the largely primitive and undeveloped appearance of the Indian Creek corridor. Existing and planned grazing research projects occur on most of TNCs grazing allotments within the proposed Class I and Very High SIO designations. For example, TNC is currently testing the effectiveness of virtual fence technology, where collared cattle learn to respond to auditory and electrical cues that signal them not to cross a virtual boundary, in the rugged and highly dissected landscape of BENM. This technology requires the use of small solar-powered radio towers to send signals to radio collars. It is not clear in the Draft RMP/EIS whether these virtual fence towers and other restoration and range improvements could meet the Class I and Very High SIO standards. The Proposed RMP/Final EIS should clarify what structures and improvements would be allowed under these standards. Beyond virtual fencing, a variety of restoration, research, and range improvements such as beaver dam analogs and other low-tech riparian restoration structures, livestock and wildlife water developments, and biological soil crust, vegetation, and research sites are all essential for maintaining and protecting the objects of BENM. TNC recommends that for research projects permitted within Class I and Very High SIO designations that the terms of the permit determine the length of exemption for the project. Restricting the research exemption to two years would prohibit any long-term projects. Many CRC projects lasting more than two years assist with the restoration of riparian areas, restoration of biological soil crusts, and avoidance of impacts to sensitive species by keeping livestock out of sensitive areas during critical times.	VIS01-General, ALT07-Modification of Existing Alternatives	Under the Visual Resources Section in Chapter 3, under the Proposed Plan, VRM Class I was updated to contain WSA's, protected LWC, and Wild and Scenic Rivers. The VRM Class II and Class III areas were also updated and would allow for the sort of infrastructure the commenters points to. Site specific NEPA analysis would determine appropriateness of specific locations and actions of proposed projects. SIO Very High was updated to contain the Dark Canyon Wilderness. SIO High was also updated and would contain the remainder of the NFS lands in BENM.
8305-15	Tracy Bodnar		Manage the monument to keep pristine dark night skies. Limit the use of shielded outdoor lighting at facilities.	VIS01-General, ALT07-Modification of Existing Alternatives	Comment noted, the inclusion of this item is already covered under the BMPs associated with BLM Technical Note 457. Additionally, shielding outdoor lighting is included in the Proposed Plan in the Night Skies Section in Chapter 3.

Table U-29. Wildlife and Fisheries

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17573-102	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	(page 2-50) Introductions and transplants of wildlife are the purview of the DWR; the DWR will work within our regulations to notify and coordinate translocations. Priority will be the discretion of DWR.	WILDFISH01-General	Under the Proposed Plan in the Management Actions by Alternative section of Wildlife and Fisheries, agencies would coordinate with the BEC, Tribal Nations, UDWR, and USFWS in the introduction, transplantation, augmentation, and re-establishment of both native and naturalized species.
17573-41	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Specifically, it does not appear that the States request for exceptions for wildlife management activities such as the use of aircraft for wildlife surveys, transplants, research projects, and the ability to access and maintain water developments constructed specifically for wildlife were incorporated into the plan. As such, the State reiterates the concerns and incorporates them by reference.	WILDFISH01-General	In the Travel Management section, the agencies may authorize case-by-case landings/takeoffs of motorized aircraft through formal permitting processes, where the use is beneficial to protecting BENM objects. The State could coordinate with the BLM in wildlife related activities, particularly where the use of aircraft is necessary. Language has been added to Overarching Management saying that "agencies will coordinate with State and local government, as appropriate, to receive information and advice on future maintenance and/or amending of this plan, as well as in the site-specific implementation-level management that follows this plan."
1810-4	Isaac Lindstrom 287 4th Ave Salt Lake City, UT 84103		Also, more initiatives like head-starting reptiles and amphibians in local communities like Blanding and Bluff and then introducing those animals back into the Monument would be helpful.	WILDFISH01-General	Under the Proposed Plan in the Management Actions by Alternative section of Wildlife and Fisheries, agencies would coordinate with the BEC, Tribal Nations, UDWR, and USFWS in the introduction, transplantation, augmentation, and re-establishment of both native and naturalized species.
864-2	Concerned conservationist		How can any destruction, degradation, or fragmentation of wildlife habitat be avoided, reduced, or successfully mitigated? Please consider these questions in moving forward.	WILDFISH01-General	The Wildlife and Fisheries section of Chapter 3 discusses the affected environment and environmental consequences for wildlife and fisheries. Impacts to wildlife and fisheries under the Proposed Plan are disclosed in Chapter 3 and Appendix N. The land management agencies consider the impacts to wildlife and their habitat (in addition to direct and indirect impacts to other resources) when evaluating proposed actions. By implementing strategies such as habitat restoration, establishing wildlife corridors, minimizing disturbance during development, and employing sustainable land management practices can significantly reduce impacts. Each proposed action must undergo an environmental assessment and adhere to regulatory frameworks that are intended to preserve and enhance wildlife habitat integrity.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18238-42	Chaitna Sinha		the stated actions should be focused solely on native species. The BEITC Plan states: "Over the millennia, wildlife has become inextricably tied to all aspects of traditional Native beliefs and practices." DEIS, Appendix L, p. 27. Focusing efforts on native species is the most consistent with Monument values and objects, and will help to ensure the preservation, restoration, and protection of the entire monument landscape as directed by proclamation 10285. We propose: Changes to Alternative E (strikethrough text), and additions from Alternatives B-D (bold). Agencies would coordinate with the BEC, Tribal Nations, UDWR, and USFWS in the introduction, transplantation, augmentation, and re-establishment of both native and naturalized species to include, but not be limited to, pronghorn, desert bighorn sheep, wild turkey, beaver, chukar, Colorado River cutthroat trout, and endangered Colorado River fish species. Priority would be given to species that provide for traditional uses and ceremonies. Introduction, transplantation, or re-establishment programs would require prior genetic and disease monitoring. [see letter for emphasis]	WILDFISH01-General, ALTO5-Alternative E	The agencies have considered the suggestion. See the Proposed Plan under the Management Actions by Alternative section of Wildlife and Fisheries.
17573-101	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.11 Wildlife and Fisheries (page 2-48) Alternative E states that guzzlers are only for culturally and ecologically important wildlife. Culturally and ecologically important wildlife should be defined. The DWR should be consulted on what wildlife is considered culturally and ecologically important in regard to the BENM RMP. The DWR recommends that all Alternatives in section 2.4.11 allow the construction and maintenance of new guzzlers to promote and enhance wildlife populations.	WILDFISH01-General, ALTO7-Modification of Existing Alternatives	Under Management Actions Common to All Alternatives, the agencies will coordinate with the BEC and Tribal Nations regarding culturally significant species. Additionally, management of these species and management actions potentially affecting these species will be coordinated with the UDWR and USFWS (if applicable). Under the Proposed Plan, guzzlers could be built for native species, and culturally important species are used as an example.
17573-98	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	In Table 2-7 (page 2-30), all alternatives should identify wildlife habitats as a benefit.	WILDFISH01-General, ALTO7-Modification of Existing Alternatives	Chapter 2 identifies the management actions common to all action alternatives for fish and wildlife species. Under the Wildlife and Fisheries section, Vegetation management timing and activities would account for key life history requirements for resident and migratory birds, including avoiding and minimizing impacts. Other management priorities include maintaining, enhancing, and/or restoring habitat through vegetation management or other actions (e.g., instream habitat improvement) to support sustainable populations of native aquatic, avian, and terrestrial wildlife species.
3125-11	Steve Knox		Page 2-48, Wildlife and Fisheries, Table 2-10, 2020 ROD/MMP, all Alternatives This action should acknowledge compliance with other resource values and uses (i.e., BENM objects, BEC concerns, Wilderness, IRAs, LWC, WSAs, VRM objectives, other types of special management areas, etc., etc.). Page 2-48, Wildlife and Fisheries, Table 2-10, 4th action, Alternative E In addition to collaboration with BEC, implementation of this action must also comply with the prescribed goals, objectives, and actions of other resource values and uses.	WILDFISH01-General, ALTO7-Modification of Existing Alternatives	The acknowledged resource values (i.e., BENM objects, BEC concerns, Wilderness, IRAs, LWC, WSAs, VRM objectives, other types of special management areas, etc.) are analyzed for all alternatives, and the resources evaluated in the RMP/EIS.
3125-32	Steve Knox		Page 2-50 and 2-51, Wildlife and Fisheries, Table 2-10, 2008 Monticello RMP, Habitat Improvement and Protection, all Alternatives Here is an example of an action that should include a statement acknowledging consistency with other resource values/uses goals, objectives, and actions. The document acknowledges the requirement of meeting Standards for Rangeland Health and Guidelines elsewhere, but what about the requirement to comply with ESA, ARPA, NHPA, Wilderness management policy, etc., etc., etc. Rather than repeatedly including a consistency/compliance with other resource values/uses statement in this table, this type of statement could be included at the beginning of the Alternatives Chapter in the Common to All Resources and Alternatives section. I didnt find it there.	WILDFISH01-General, ALTO7-Modification of Existing Alternatives	The Relationship to Policies and Plans section states that the agencies have considered and developed the Proposed RMP/Final EIS to be consistent with the applicable laws, regulations, policies, and plans listed in Appendix B.
18713-4	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	Culturally important wildlife should be managed and studied scientifically through this plan to maintain and restore biodiversity. However, this plan fails to specify how it will manage the myriad wildlife species that live within and beyond Bears Ears. Plans detailing how human-carnivore conflict can be mitigated and what appropriate response looks like given the sacred place such carnivores as Black Bear hold should also be considered. We rarely recognize carnivores as ecological engineers. This plan should request that the State of Utah stop allowing hunting bears inside of Bears Ears.	WILDFISH01-General, CULO3-Tribal Concerns	The management of carnivore and predator populations in Bears Ears National Monument falls under the jurisdiction of the Utah Division of Wildlife Resources (UDWR). UDWR establishes hunting and trapping seasons, quotas, and methods for hunting based on population assessments and management objectives. UDWR collaborates with federal agencies, tribal nations, conservation organizations, and researchers to implement effective carnivore management strategies. Regulations are designed to maintain sustainable populations while addressing conflicts with human activities such as livestock grazing or public safety concerns. UDWR also engages with local communities, stakeholders, and the public to raise awareness about carnivore conservation, management strategies, and the importance of coexistence. Education efforts may focus on understanding carnivore behavior, reducing attractants (such as garbage or livestock carcasses), and promoting responsible outdoor recreation practices. For the most current and specific information regarding carnivore management in Bears Ears National Monument, including hunting regulations, conservation efforts, and research initiatives, it is recommended to visit the Utah Division of Wildlife Resources website or contact UDWR directly. They can provide detailed insights into their management practices, ongoing projects, and community involvement efforts related to carnivore populations.
3125-31	Steve Knox		Page 2-48, Wildlife and Fisheries, Table 2-10, Alternative D and E I dont know how you can expect to prohibit a no swimming/bathing rule, let alone monitor that activity. Id recommend a Leave No Trace approach, visitor notification via permits and rules, trailhead signs, as well as extensive monitoring.	WILDFISH01-General, REC01-General	Thank you for your suggestion. The Proposed Plan in the Wildlife and Fisheries section says that bathing in-canyon stream/pool habitat in BENM is prohibited except where inconsistent with the Religious Freedom Restoration Act or other applicable laws. Compliance will be addressed at the implementation level through education and/or permit stipulations.
9296-1	John Carter PO Box 464 Bondurant, WY 82922	Yellowstone to Uintas Connection	The deficiencies in the RMP are too numerous to detail and it needs to be revised to address the protection and restoration of the ecosystem and objects yet undefined. It must assess and report the current state of these upland and riparian habitats and associated wildlife populations compared to their potential and address the causes of environmental degradation. It must provide quantitative and systematic monitoring and management to guide decisions. It must rely on the best available science	WILDFISH01-General, WAT04-Riparian, Wetland, and Groundwater-dependent Ecosystems, DATA01-	Information regarding the impacts to upland and riparian habitats and associated wildlife populations are described in Appendix N, Wildlife and Fisheries. Further information can be found in Appendix N, Terrestrial Habitat and Vegetation Resilience and Conservation, Water Resources, and Forestry and Woodlands.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			for decision making going forward. The intent of our laws and regulations must be enforced regardless of political forces or special interests.	Analysis Methods and Data	
788-1	Nancy Woodward		Please choose option 5 which provides comprehensive protections for habitat and diversity. At this time of climate catastrophe, the most conservative approach toward management of wild lands is required.	WILDFISH02-Wildlife Habitat	The RMP/EIS analyzes a range of alternatives for all Monument resources and objectives, including but not limited to the impacts on fish and wildlife species and their habitats. Each alternative will be evaluated by the BLM, USDA Forest Service, and Bears Ears Commission.
14767-153	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	The goals in 2.4.11.1 provide the wishful aspiration to: Manage to protect large undisturbed blocks of terrestrial and aquatic habitat and, where possible, consolidate and create larger protected blocks of habitat to ensure habitat connectivity. This is problematic for a number of reasons. Firstly, it assumes that disturbance will continue to be allowed despite the prohibition in FLPMA 302 (a) etc, and that these disturbances both protect and restore the objects. Next, it ignores the fact that virtually every acre of the BENM that livestock can physically access is disturbed by 1) major degradation of the plant community 2) water developments, pipelines, fences 3) tens of thousands of livestock.	WILDFISH02-Wildlife Habitat, ALT07-Modification of Existing Alternatives	FLPMA 302(a) mandates that national monuments be managed in a way that preserves their unique qualities and ensures their long-term protection, balancing conservation with responsible use and enjoyment. Any disturbance or activity within these areas must comply with the management objectives set forth in the Monument's specific management plan and are evaluated on case-by-case basis. Agency proposed activities undergo an environmental analysis process that analyzes the impacts of the proposed disturbance on the Monument's objects and resources. Additionally, areas where livestock are permitted in the Monument are monitored and managed under the Standards for Rangeland Health and Guidelines for Grazing Management for BLM Lands in Utah (BLM 1997) or USDA Forest Service desired conditions for rangelands (BLM 2020).
17573-79	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Wildlife infrastructure (i.e., guzzlers and monitoring exclosures) in the BENM requires maintenance; the ability to access and upkeep these developments should be maintained. New infrastructure for wildlife and habitat restoration may be needed and should be considered a priority for wildlife management in the BENM. Best management practices (BMP) for habitat restoration and wildlife infrastructure should be used.	WILDFISH02-Wildlife Habitat, ALT07-Modification of Existing Alternatives	Under all alternatives, the continued maintenance of guzzlers would be allowed. In the Proposed Plan in the Wildlife and Fisheries section of Chapter 2, precipitation catchments would only be allowed to protect BENM objects and livestock access to precipitation catchments specifically built for wildlife would be prohibited. Each proposed project is subject to an environmental assessment to determine the potential impacts (positive and negative) on wildlife and their habitat. The agencies will evaluate each alternative in consideration of public comments.
14767-155	Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925Jonathan Ratner 31 Old Tie Hack Rd Cora, 82925	Sage Steppe Wild	In 2.4.12, for Special Status Species, the BLM ignores its duties both to recover these species (see Special Status Species manual) under its multiple use framework but fails to even mention the mandate to restore these species. Again it talks of allowing adverse effects to these species. How do adverse effects protect and restore these species? The BLM provides no rational support for this contention. You are prohibited from camping in MSO PACs, but you can camp a thousand head of livestock in a single PAC with no restrictions. This is absurd. For goshawk, its the same. No discretionary activities would be allowed in occupied goshawk habitat unless the actions principal purpose is to protect BENM objects But because the BLM has dishonestly and arbitrarily decreed its permitted livestock grazing as not discretionary, its exempted.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors), ALT07-Modification of Existing Alternatives	Management actions that have potential impacts to Special Status Species are evaluated through a separate/additional environmental review process that includes Section 7 consultation with USFWS (as appropriate). While a proposed action may have short term adverse effects on Special Status Species, the long term, net benefit for the species and/or habitat is considered and weighted more heavily in the evaluation of management actions. Additionally, the potential impacts on sensitive species is considered for each individual grazing management decision including proposed projects, permits, or lease renewals. Furthermore, habitat conservation for Mexican Spotted Owl (MSO) and northern goshawk and grazing leases are not mutually exclusive. MSO nest in caves along cliff walls within rocky canyon habitats and Northern goshawk prefer mature forests with large trees for nesting and hunting. These habitats are not directly impacted by livestock although indirect impacts (loss of vegetation communities, prey availability and habitat, etc.) may occur. Restrictions on camping are based on recommendations made in the MSO Recovery Plan and in consultation with USFWS based off of best available science. These impacts are considered and disclosed in the Proposed RMP/Final EIS.
15055-15	Robin Todd	Maryland Ornithological Society	In the new management plan, the BLM and FS should give the highest priority to protecting the objects of historic and scientific interest for which the monument was designated, including sacred Native American sites, paleontological sites, and biological and ecological values. Those objects are described in Proclamations 9558 and 10285.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	The alternatives analyzed in the RMPs/EIS include a range of management actions that provide for the proper care and management of the Monument objects and values, including sacred Native American sites, paleontological sites, and biological and ecological values. While all Alternatives serve to protect the Monument's objects, the Proposed Plan incorporates and prioritizes the perspective of Traditional Indigenous Knowledge. Additionally, the Bears Ears Commission continues to be engaged throughout the RMP/EIS process.
15761-6			What research do you site to set the limits of protection to 100 feet around MSO sites. That seems too small an area for protection.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	The restriction was removed under the Proposed Plan.
15761-9			Use a third-party monitor to ensure the FS and BLM follow protocol. I was on several surveys where the FS cut before the goshawk survey was done. Please balance the use of scientific evidence and indigenous tribal knowledge for the sake of the Goshawks, MSO etc.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	Monitoring efforts for northern goshawks and other wildlife species, can vary based on suitable habitat, seasonal restrictions, BMPs and ability to access the area. Population studies are also conducted periodically within designated study areas. Survey/study work is conducted as funding, staff and resources are available and is done to fill a purpose for specific projects and research. This work and survey information gathered often already needs to adhere to set protocols, making a third party monitor irrelevant. While all alternatives serve to protect the Monument's objects and values, the Proposed Plan incorporates and prioritizes the perspective of Traditional Indigenous Knowledge. Additionally, the Bears Ears Commission continues to be engaged throughout the RMP/EIS process.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17573-104	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Utah's Wildlife Action Plan (WAP) and Species of Greatest Conservation Need (SGCN) listed therein should be referenced when referring to special status species. The WAP is Utahs ESA listing prevention tool in Utah. The BLM has helped develop and address the threats to SGCNs identified in the WAP, and it should be used to identify Special Status Species. The WAP should be included where appropriate in Table 2-11. In addition, the WAP identifies and addresses threats and key habitats that should be considered in Section 2.4.12 (page 2-53) In addition to the listed agencies, the DWR should be consulted if any wildlife-related closures are considered. When cave closures are considered, DWR should be consulted to provide bat-friendly designs.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors), DATA03-Suggest Additional Data Source	Under Management Actions Common to All Alternatives, the agencies will consider Utah statewide conservation strategies in coordination with UDWR and the USFWS to manage wildlife and their habitats. This would include WAP. While an exhaustive list of conservation strategies is not included in this RMP, the agencies will use the best available data and information for wildlife habitat management.
1810-5	Isaac Lindstrom 287 4th Ave Salt Lake City, UT 84103		Iso, seasonal closures in canyons to protect tadpoles and plant species that flower could be helpful, as could closing the rock climbing walls in Indian Creek during raptor season.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors), TRAVEL01-General	In the Proposed Plan under Overarching Management, agencies may issue closures in accordance with applicable law, regulation, and policy when the closures would support protecting BENM object, including, but not limited to, protecting special status species populations, habitat, connectivity, forage, prey base, and/or cultural resources.
18238-89	Chaitna Sinha		The language of the proposed replacement Desired Condition BENMDA-DC-01 is both problematic and inappropriate. Proclamations 9558 and 10285 are applicable and in effect. It is improper to speculate about a potential future proclamation (or most current proclamation) in plan amendment language. For this reason, the following strikethrough must be applied in the 1986 M-LS LRMP amendment, Desired Condition 01: BENMDA-DC-01: The objects of antiquity and the objects of historic or scientific interest, as identified by Presidential Proclamation 9558, as modified by Presidential Proclamation 10285, or most current proclamation, are protected. [see letter for emphasis]	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors), ALT05-Alternative E	Recommended Wilderness and Plan Revision 106 meetings with individual Tribes and the BEC have occurred and are ongoing (2018- present). Therefore, it is not inappropriate or speculative to suggest that future proclamations or plan amendments might apply.
18295-2	Kira Ratcliffe		In regard to raptor closures, I agree that walls with active raptors nesting should be closed to climbing. However, my experience with the BLM biologists in Indian Creek was that the closures are sweeping blanket closures and there are not resources or programs in place to figure out where raptors are actually nesting. I think if raptor closures are mandatory, the BLM needs to establish closure thresholds in the management plan and lay out the types of monitoring required to avoid unnecessary closures.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors), ALT07-Modification of Existing Alternatives	Seasonal closures are determined based on the best available data and information the BLM has at the time. Under Management Actions Common to All Alternatives, the agencies will collaborate with the BEC and local, state, federal, and Tribal partners for inventory and monitoring of wildlife species and their habitats.
18982-2	Daniel Kent 399 E 100N Moab, 84532	Friend of the Abajos	The Bears Ears and the extensive public wildlands to the South, West and North of the monument create an ideal situation for Threatened and Endangered wildlife expansion/colonization/reintroduction, including the Mexican spotted owl, wolf, black footed ferret, Utah prairie dog, sage grouse and more. The monument should be managed to allow for this ideal situation to be retained and enhanced.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	One of the goals identified in for fish and wildlife species is to ensure management actions support the protection of special status species and their habitats, including culturally identified species and their habitats, to maintain and improve viable species populations, connectivity and movement needs, prey species, and forage. Under all alternatives, agencies would collaborate with the BEC, UDWR, and USFWS in the introduction, transplantation, augmentation, and re-establishment of native species.
3125-12	Steve Knox		32. Page 2-56, 2.4.12, Special Status Species, Table 2-11, 2008 Monticello RMP, 6th action This action states that certain actions would be allowed for the benefit of special status species. However, the action must acknowledge compliance and consistency with other resource programs. What if the relocation targeted habitat is in designated Wilderness, WSAs, IRAs, or LWC - all managed to protect their wilderness values/characteristics? Construction of water developments, use of motorized vehicles, or mechanized equipment would likely impact wilderness resources and may not be allowed given the magnitude of a project. The action should acknowledge other resource considerations.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors)	Appendix B lists laws, regulations, and policies that were considered while preparing the Proposed RMP/Final EIS. Individual proposed actions will be subject to subsequent environmental analysis where the potential impacts to Monument objects and resources would be evaluated further.
552-6			The tamarisk beetle, which does occur within the management area, should be considered along with these other species. Consider methods to prevent tamarisk beetles from defoliating tamarisk while SWFLs are nesting and provide alternative nesting sites. The alternatives provided should consider the presence of tamarisk beetles and how to manage them in more detail than the current EIS provides.	WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors), ALT07-Modification of Existing Alternatives	Evaluation of the tamarisk beetle and the potential impacts to invasive woody plants and native species habitat is beyond the scope of this RMP. Separate Section 7 consultation with the USFWS and an environmental review process will be conducted in the future if management actions are considered.
15334-3	Bailey Brennan	National Wildlife Federation	As Proclamation 10285 acknowledges, the Monument and surrounding areas provide important habitat for wildlife, including migration corridors for mule deer and bighorn sheep. We generally support the approach the agencies have identified in Alternative E related to big game protections and conservation. The Forest Service and BLM properly rely on collaboration with the BEC and associated TIK to inform the identification of important corridors and habitat and to develop management protocol. In addition to the measures proposed in the Draft RMP for protecting corridors, the agencies should work with the BEC to monitor the extent to which roads serve as a barrier to wildlife movement. Further, we ask that, in addition to the measures outlined in Alternative E, the agencies work with the BEC to manage wildlife more holistically. This would include considering	WILDFISH05-Big Game and Migration Corridors, ALT05-Alternative E	The agencies, in collaboration with the BEC, will continue to work with the Utah Division of Wildlife Resources on the Wildlife Migration Initiative to document, preserve and enhance the movement of wildlife. The Proposed Plan (Wildlife and Fisheries Section) includes direction to provide for habitat and avoid, minimize or mitigate impacts to all wildlife species on the Monument, which includes special status species, species important to Tribal Nations and other native and existing aquatic, avian and terrestrial wildlife.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			habitat conservation and management for all species, not just those identified as special status species.		
17807-7	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Protect and support the habitat of big horn sheep and other scarce animals, are there existing plans to increase the number of such animals.	WILDFISH05-Big Game and Migration Corridors, ALT05-Alternative E	Under the Proposed Plan in the Management Actions by Alternative section of Wildlife and Fisheries, agencies would coordinate with the BEC, Tribal Nations, UDWR, and USFWS in the introduction, transplantation, augmentation, and re-establishment of both native and naturalized species to include, but not be limited to, desert bighorn sheep. The Proposed Plan in the Management Actions by Alternative section of Wildlife and Fisheries also includes continued monitoring of the five mesa tops and other existing and potential bighorn sheep habitat sites would be conducted in collaboration with the BEC.
1928-1	Robert Pazik		Administer additional protections to ancestral lands through conserving animal migration corridors and habitats to ensure that wildlife can thrive and hunting and fishing will continue for generations to come.	WILDFISH05-Big Game and Migration Corridors, ALT05-Alternative E	Under the Proposed Plan in the Management Actions Common To All Alternatives section of Wildlife and Fisheries, agencies will collaborate with the BEC to identify and avoid or minimize adverse impacts on native aquatic, avian, and terrestrial species habitat, connectivity, and movement.
14265-2	Korina Riggin		Even though this is a National Monument, I feel that additional protections to ancestral lands through conserving animal migration corridors and habitats to ensure that wildlife can thrive and hunting and fishing will continue for generations to come. This will involve a balance the various communities with respect, and input, from the Indigenous people.	WILDFISH05-Big Game and Migration Corridors, ALT07-Modification of Existing Alternatives	In the Proposed Plan in the Inventorying, Monitoring, Science, and Indigenous Knowledge section, agencies will collaborate with the BEC, Tribal experts recognized by Tribal Nations, and applicable federal and state agencies, in inventorying and monitoring of wildlife habitat (including but not limited to hiding cover, migration routes, and connectivity), and culturally important wildlife. Maps of wildlife habitat are provided in Appendix A. IM 2023-005 directs the BLM to consult with state fish and wildlife agencies and Tribes to assess habitat connectivity in order to manage as best as possible for intact, connected habitat.

Table U-30. Woodlands and Forestry

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
3125-8	Steve Knox		Page 2-30, 2.4.8, Forestry and Woodlands, Table 2-7, Management Actions Common to All Alternatives, 6th bullet What about prescribed fire as fuel and vegetation treatment? Would standing dead trees be available for harvest with the use of motorized equipment (chain saws)? If yes, then certain special management areas (LWC, WSAs, Wilderness, IRAs, some ACECs, RNAs, etc.) should be excluded from this action as motorized and mechanical tools would be inappropriate in those areas. Add consistent with protection of other identified resource values to the wording of the action.	FOREST01-General	Vegetation treatment methods would be subject to management requirements specific to the treatment location, which would include LWC, WSAs, Wilderness, IRAs etc. In the Proposed Plan, vegetation management would include all available tools, including mechanical methods, consistent with protection of BENM objects. Also, in the Proposed Plan it states that fuels and vegetation management in designated wilderness, WSAs and lands managed for wilderness characteristics would be allowed if they were determined to be consistent with the protection of Monument objects and maintain or enhance long-term wilderness character or characteristics, as applicable. Also, in Fire Management the plan states that when possible, wildland fire would be allowed to function in its natural ecological role.
8305-5	Tracy Bodnar		A firewood harvesting permit system for woodcutting should be implemented with Tribal consultation and leadership in how the system is designed and allocated.	FOREST01-General	In the Management Actions Common to All Alternatives for Forestry and Woodlands it states "authorizations for private use of wood products would continue to be issued to the public, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations. This coordination would also, if appropriate, include identifying areas for seasonal or multiyear closures to allow regeneration of woodlands or to provide for traditional or ceremonial uses as appropriate."
8848-3	Robert & Ruth Fountain		We believe Alternative E should be improved to prohibit mechanical treatments and commercial timber harvest.	FOREST01-General, ALT05-Alternative E	See the Proposed Plan in the Vegetation and the Forestry and Woodlands sections. In the Vegetation Section, the Proposed Plan says that vegetation management would include all available tools, including mechanical methods, consistent with the protection of BENM objects. No chaining would be allowed and light-on-the-land techniques would be used where practicable. In the Forestry and Woodlands section, the Proposed Plan says that agencies would collaborate with the BEC to identify criteria and/or areas for commercial timber harvest if activities protect BENM objects.
1512-2	Art Hanson		As you adopt Alternative E in the final plan, I strongly urge you to refine it so that it bars mechanical treatments for vegetation management including clearcutting, uses only native seeds in restoration projects, and enacts immediate protections for old-growth trees. Extensive damage has already been done to cultural sites, soils, and native vegetation by decades of destructive vegetation treatments in the region, and nows the time for a new approach.	FOREST01-General, ALT05-Alternative E	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management. (The range of alternatives analyzed in the RMP/EIS include varying levels of vegetation management and methods. See the Fire Management and Vegetation sections of the Proposed Plan, and the Terrestrial Habitat and Vegetation Resilience and Conservation and the Cultural Resource Management, Indigenous Peoples' Religious Concerns, and Tribal use sections in Chapter 3 for impacts to vegetation and impacts to cultural resources). Prior to approval of any site-specific proposals for vegetation treatment, the BLM and USDA Forest Service would perform any necessary environmental analysis and reviews, including a determination of whether the activity is consistent with the proper care and management of Monument objects and values. This evaluation would include cultural resource surveys, impacts analyses, and identification of any applicable mitigation actions, which may include altering prescribed treatment methods or the location of treatments. Chaining is not allowed in the Proposed Plan. The Proposed Plan

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat.
17573-96	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.8 Forestry and Woodlands (page 2-29) The DWR and WRI partnership should be included alongside the BEC in Alternative E in all sections of 2.4, including 2.4.8 Forestry and Woodlands.	FOREST01-General, ALT05-Alternative E	Text was added to the Vegetation section of Chapter 2 to include coordination with UDWR and USFWS. Coordination with UDWR would encompass coordination with the WRI partnership.
18238-22	Chaitna Sinha		We propose: To be consistent with the protection of Monument objects and values and in alignment with the developing national old-growth policies, the final plan requires the Agencies (in collaboration with the BEC) to provide immediate protections for old-growth trees within the Monument.	FOREST01-General, ALT05-Alternative E	The identification and protection of old-growth trees within the Monument is within the range of alternatives. Agencies, in collaboration with the BEC, would identify stands with old-growth characteristics, prepare an inventory, and plan for managing them (see Forestry and Woodlands Management Actions Common to All Alternatives).
18238-23	Chaitna Sinha		We propose: Old-growth trees should be inventoried and protected within all proposed and current vegetation projects areas, as well as areas open to wood product harvest. The inventory should utilize the old-growth criteria for the Intermountain Region (Region 4) included in Table 11, Appendix 1 of the Mature and Old-Growth Forest Report unless a representative sample of aged trees (through coring or cookies) determines that a different set of criteria is more appropriate for a given location.	FOREST01-General, ALT05-Alternative E	The identification and protection of old-growth trees within the Monument is within the range of alternatives. Agencies, in collaboration with the BEC, would identify stands with old-growth characteristics, prepare an inventory, and plan for managing them (see Forestry and Woodlands Management Actions Common to All Alternatives).
18238-24	Chaitna Sinha		We propose: The final plan must ensure that the purpose of all vegetation management in old- growth forests is limited to proactive stewardship to promote resilient and adaptable old- growth forest conditions.	FOREST01-General, ALT05-Alternative E	The identification and protection of old-growth trees within the Monument is within the range of alternatives. Agencies, in collaboration with the BEC, would identify stands with old-growth characteristics, prepare an inventory, and plan for managing them (see Forestry and Woodlands Management Actions Common to All Alternatives).
18238-25	Chaitna Sinha		We propose: The following additions to Alternative E from Alternative D (underlined), and other necessary changes (in bold): Agencies will limit the maximum size opening created by silvicultural treatment in ponderosa pine and mixed-conifer forest to two acres. All other forest types will be limited to a maximum size opening of ten acres. These standards could be altered on a case-by-case basis in collaboration with the BEC on additional standards of maximum size openings for silvicultural treatments, as consistent with federal regulations. [see letter for emphasis]	FOREST01-General, ALT05-Alternative E	The size of openings created by silvicultural treatments in ponderosa pine and mixed conifer forests are considered within the range of alternatives analyzed in the RMP/EIS. See the Forestry and Woodlands section in Chapter 2. Implementation of silvicultural treatments would also require site specific NEPA analysis, and project level planning would utilize treatment specifications.
18238-26	Chaitna Sinha		We propose: The following additions to Alternative E from Alternatives A-D (underlined), and other necessary changes (in bold): As a standard, leave a minimum of 200 snags/100 acres in the ponderosa pine and aspen cover types and 300 snags/100 acres in the mixed-conifer cover type. The minimum preferred size of snags is 18 inches DBH and 30 feet tall. If the minimum size is unavailable, use the largest trees available on-site. The number of snags should be present at the stand level on average and, where they are available, distributed over each treated 100 acres. These standards could be altered on a case-by-case basis in collaboration with the BEC, with consideration for the cultural and ecological importance of snags. [see letter for emphasis]	FOREST01-General, ALT05-Alternative E	Snag distribution is considered within the range of alternatives analyzed in the RMP/EIS. See the Management Actions by Alternative section for Woodlands and Forestry. Minimum snag numbers and size standards would be determined by the agencies and in collaboration with the BEC, with consideration for the cultural and ecological importance of snags. Implementation of silvicultural treatments would also require site specific NEPA analysis, and project level planning would utilize treatment specifications.
18238-27	Chaitna Sinha		We propose: The following additions to Alternative E from Alternatives A-D (underlined), and other necessary changes (in bold). When initiating vegetative management treatments, prescriptions should be designed to retain a minimum of 30 down logs (12-inch mid-point diameter and 8 feet long) and 50 tons of coarse woody debris/10 acres in the ponderosa pine cover type, 50 down logs and 100 tons of coarse woody debris/10 acres in mixed- conifer cover type, and 50 down logs and 30 tons of coarse woody debris/10 acres in the aspen cover type. These standards could be altered on a case-by-case basis in collaboration with the BEC. [see letter for emphasis]	FOREST01-General, ALT05-Alternative E	In the Proposed Plan, minimum down log numbers and size standards for material retained after vegetation treatment would be determined by the agencies and the BEC. Implementation of silvicultural treatments would require site specific NEPA analysis, and project level planning would utilize treatment specifications.
18238-21	Chaitna Sinha		Old-growth trees are special to many people from all walks of life, and a plan to manage these invaluable trees should consider public input. Allowing for such engagement can foster trust between the public and the Agencies while supporting the goals and recommendations set forth by the BEC. We propose: As with all implementation-level plans, the BENM old-growth management plan must go through the NEPA process, including public comment, in a way that does not delay the 5-year deadline.	FOREST01-General, ALT05-Alternative E, PUBL01-Public and Stakeholder Involvement	Following direction in EO 14072 (Strengthening the Nation's Forests, Communities and Local Economies) the agencies will develop management and conservation strategies to address threats to mature and old-growth forests. Implementation plans will go through NEPA and public comment processes.
16236-8	Michael Painter Californians for Western Wilderness, P.O. Box 210474 San Francisco, CA 94121	Californians for Western Wilderness	For restoration projects, the use of mechanical treatments such as chaining should be prohibited, and locally-sourced (to the extent possible) native seeds should be used where projects require replanting.	FOREST01-General, ALT07-Modification of Existing Alternatives	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management. (The range of alternatives analyzed in the RMP/EIS include varying levels of vegetation management and methods (See the Fire Management and Vegetation sections of the Proposed Plan). Prior to approval of any site-specific proposals for vegetation treatment, the BLM and USDA Forest Service would perform any necessary environmental analysis and reviews, including a determination of whether the activity is consistent with the proper care and management of Monument objects and values. This evaluation would include cultural resource surveys, impacts analyses, and identification of any applicable mitigation actions, which may include altering prescribed treatment methods or the location of treatments. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat.

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17573-99	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	In Table 2-7 (page 2-34), Forest and Range Research Alternative E should include coordination with the GBRC as a collaborator. The GBRC has a long history of collaboration with the Rocky Mountain Research Station (RMRS). The GBRC would like to be made aware of research occurring in the BENM and have the opportunity to provide feedback and potential collaboration.	FOREST01-General, ALTO7-Modification of Existing Alternatives	In the Proposed Plan in the Forestry and Woodlands section, the management action that the commentor has requested changes in is not carried forward.
8732-9	Susan Markley PhD FL		A firewood harvesting permit system for woodcutting should be implemented with Tribal consultation and leadership in how the system is designed and allocated.	FOREST01-General, ALTO7-Modification of Existing Alternatives	The Management Actions Common to All Alternatives section in Forestry and Woodlands states "authorizations for private use of wood products would continue to be issued to the public in accordance with applicable law, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations. This coordination would also, if appropriate, include identifying areas for seasonal or multiyear closures to allow regeneration of woodlands or to provide for traditional or ceremonial uses as appropriate."
3125-24	Steve Knox		Page 2-31, Forestry and Woodlands, Table 2-7, 4th 2020 ROD/MMP action, Alternative E If prescribed fire is considered a vegetation treatment, and it occurs in an IRA or Wilderness on the National Forest, off-road travel up to 150 feet to gather wood would not be consistent with management of wilderness values/characteristics, and should not be allowed.	FOREST01-General, FIRE01-General	Prescribed fire is allowed in both designated wilderness and IRAs. Motorized travel is prohibited in designated wilderness areas, per the Wilderness Act of 1964. Off road travel for collection of wood is not being allowed under the Proposed Plan anywhere within BENM.
18560-5	Anna Peterson	The Mountain Pact	bar mechanical treatments for vegetation management (no clearcutting and only use native seeds in restoration). Please also enact immediate protections for old-growth trees	FOREST01-General, HABVEG01-Vegetation	See the Proposed Plan in Fire Management and Vegetation sections. Chaining is not allowed in the Proposed Plan. The Proposed Plan would prioritize the use of native seeds for restoration based on availability, adaptation, and probability of success. The Proposed Plan would promote late-successional and old-growth habitat. See the Terrestrial Habitat and Cultural Resources sections in Chapter 3 for discussion of impacts to vegetation and cultural resources from vegetation management.
8986-3	Britt Hornsby 190 N 3rd East Unit #1 Bluff, UT 84512	Town of Bluff	Bluff Supports permitting for wood cutting. We encourage BENM agencies and co-managers to work with Bluff to provide greater access to wood permits through an agreement with town to issue required permits, as well as the creation of a much-needed Wood Bank in Bluff to help provide this scarce resource with our community and neighbors when projects are completed on the landscape.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Proposed Plan as well as all alternatives include management action common to all in Forestry and Woodlands to support the collection, storage, and transportation of fuelwood products to communities in coordination with BEC, Tribal Nations, local governments, Forestry, Fire, and State Lands (FFSL) and other organizations.
17326-3	Ben Muhlestein		On page 2-83 it mentions that collecting dead firewood would be restricted in developed campsites. This doesn't reflect the current patterns of nearly any user I am aware of.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	In the Forestry and Woodlands section of the Proposed Plan, wood product collection would be prohibited in developed recreation sites to protect BENM objects. See the Management Actions by Alternative section for more details.
17573-111	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	ES-5.1.6 Forestry and Woodlands On page ES-15 the plan states, Alternative E is the alternative that most emphasizes and implements collaboration with the BEC and Tribal Nations. Under Alternative E, no areas are designated as open or closed to wood product harvest at this time. Rather, if Alternative E is selected, the acreages open and closed to wood product harvest would be determined by the agencies in collaboration with the BEC, and the selected acreages open to wood product harvest would determine the level of woodland resources open for harvest. Whatever alternative is chosen, FFSL urges the BLM to coordinate with FFSL on wood product harvest. In addition, the program Wood for Life should be considered, and consultation should be done with FFSL to ensure this program is not negatively impacted.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	See the Management Actions by Alternative section for Forestry and Woodlands of the Proposed Plan for updated management actions for acreages open and closed to woodland harvest. FFSL and the Wood for Life Program were added to the Forestry and Woodlands section.
17573-114	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	On page ES-25, the plan states, Under Alternative A, access for noncommercial timber harvesting is the most limited, and this could disproportionately impact environmental justice communities by restricting access to products. These communities of concern who use wood products for heating sources would likely need to find other sources for heating in the winter. Firewood users would be required to pay higher prices for alternative fuels or for fuelwood procured resulting in high social health costs; however, reducing use of wood for heating sources could improve air quality for the surrounding communities, including environmental justice populations, especially during the winter months due to inversion conditions. Under Alternatives B, C, D, and E, access for authorized private wood product harvest is allowed on LWC if the harvest provides benefits to wilderness characteristics and meets VRM Class II objectives, for Alternative B, and VRM Class I objectives for Alternatives C, D, and E. This management decision provides flexibility regarding locations of wood product harvest, which could benefit all communities. Under all alternatives, the BLM and USDA Forest Service would continue to coordinate and consult with Tribes with ties to BENM. Also, the BLM and USDA Forest Service would implement mitigation measures that would reduce impacts to Tribal communities, such as impacts to timber and wood cutting resources, subsistence resources, and cultural and spiritual resources. Whatever alternative is chosen the program Wood for Life should be considered and consultation should be done with FFSL to ensure this program is not negatively impacted.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The agencies considered the commentators' suggestion. See the Forestry and Woodlands section of Chapter 2 for updated management actions for acreages open and closed to woodland harvest. The Wood for Life Program was added to the Management Actions Common to All Action Alternatives for the Forestry and Woodlands section of Chapter 2.
17573-58	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State incorporates those comments by reference and again asks the Agencies to ensure that woodland harvest will be allowed to continue for years to come. Failure to allow forest and Woodland harvest will negatively impact San Juan Countys most underserved residents by funneling them into limited areas ensuring the eventual unavailability of wood and potentially unwanted impacts on the	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	Impacts on environmental justice are analyzed in section the Environmental Justice and Social and Economic Values section of Chapter 3 of the RMP/EIS. See the Forestry and Woodlands section of Chapter 3 for relevant management actions. The Proposed Plan allows for continued woodland harvest following applicable laws. See Appendix A for maps of areas available in the Proposed Plan.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			landscape. Environmental Justice requires further analysis before any closure of forest and woodland harvest within the monument.		
17573-60	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, wood gathering is a cultural and historical event for families of all communities that call this area home. Failure to acknowledge the impacts on those cultural uses would be a failure to carry out the directives of the Proclamation.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	See the Environmental Justice and Social and Economic Values section of Chapter 3 for a discussion of impacts on communities from wood gathering management actions.
18238-29	Chaitna Sinha		Tribes have maintained relationships of reciprocity with forests and woodlands since time immemorial. Generations of regional knowledge have been accumulated within Tribal communities about forest health, resiliency, and management that result in more robust forests and stronger ecological communities. We propose: To ensure collaborative management is an inherent part of this plan as intended by the Proclamations, the final plan should include the requirement that all vegetation treatment and silvicultural plans would be approved by the BEC prior to implementation.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting), ALT05-Alternative E	Collaboration with the BEC for vegetation management activities is included in the Management Actions Common to all Actions Alternatives for woodland and forestry resources.
18238-30	Chaitna Sinha		Commercial timber harvest has a high potential to harm Monument objects and must be taken out of the final plan. Commercial wood harvest will still allow for the improvement of forest conditions while supporting local communities. Commercial wood harvest is significantly less destructive and is usually done on a smaller scale. Commercial wood harvest and commercial timber harvest should each be defined in the final plan, with the latter being explicitly prohibited. We propose: Additions to Alternative E (in bold): Agencies will collaborate with the BEC to identify criteria and/or areas for commercial wood product harvest if activities protect BENM objects. This will include identifying opportunities to use wood product harvest to improve or restore healthy forest conditions. Commercial timber harvest will be prohibited on BENM. [see letter for emphasis]	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting), ALT05-Alternative E	In the Management Actions Common to all Action Alternatives for woodland and forestry resources: All lands in BENM would be designated as lands not suited for timber production (i.e., growing, harvesting, and regenerating crops of trees for commercial use); however, timber management would be used as appropriate to provide for the protection of BENM objects.
18302-5	Joe Jones		A firewood harvesting permit system for woodcutting should be implemented with Tribal consultation and leadership in how the system is designed and allocated.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting), ALT05-Alternative E	The Management Actions Common to All Alternatives for woodland and forestry resources states "authorizations for private use of wood products would continue to be issued to the public in accordance with applicable law, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations. This coordination would also, if appropriate, include identifying areas for seasonal or multiyear closures to allow regeneration of woodlands or to provide for traditional or ceremonial uses as appropriate."
18330-13	Rose Chilcoat 2914 Junction St Durango, CO 81301		Firewood harvesting must be addressed as in adequate BLM enforcement has allowed motorized use and destruction with the Wilderness Study Areas on Cedar Mesa and elsewhere. A permit system designed to protect resources while allowing selective areas for woodcutting should be developed in consultation with area Tribes.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting), ALT07-Modification of Existing Alternatives	The Management Actions Common to All Alternatives for woodland and forestry resources states "authorizations for private use of wood products would continue to be issued to the public, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations. This coordination would also, if appropriate, include identifying areas for seasonal or multiyear closures to allow regeneration of woodlands or to provide for traditional or ceremonial uses as appropriate."
18677-12	Benjamin Bellorado Tucson, AZ		Firewood gathering is an important component of the monument for tribal peoples in the area, but there needs to be some mechanism of educating firewood gatherers on how to avoid damaging intact archaeological sites and features, including historically chopped wood and standing trees with stone and metal axe cut trees (some of which are still standing and living) at historic archaeological sites.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Cross-Cultural Education and Outreach section of Chapter 2 says that the agencies will collaborate with the BEC to develop a woodcutter education program to educate woodcutters regarding wood cutting safety, authorization requirements, wood cutting opportunities and impacts, traditional indigenous values associated with forestry and the importance of forestry to the protection of BENM objects.
18708-4	Heidi Blankenship Blanding, UT 84511		I understand that woodcutting is critical for tribes, but that single open keyhole where woodcutting is allowed in the Hat Flat area, which is surrounded by the Grand Gulch Instant Study Area, has few trees. Anyone hoping to harvest wood there has to drive a long ways off-road to find good wood. Instead, woodcutters tend to harvest within the ISA where more trees grow. Eliminating wood harvest from that small keyhole would protect the "Wilderness Quality Lands" that you have identified there and would help protect a large chunk of the ISA.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting), ALT07-Modification of Existing Alternatives	The agencies will collaborate with BEC during implementation for areas unavailable for fuelwood harvest, where consistent with applicable law.
18965-13	Simone Griffin	BlueRibbon Coalition	Many locals, including those of indigenous descent rely solely on wood burning stoves to heat their homes. By preventing and limiting wood gathering and harvesting for wood stock piling, the BLM will be greatly impacting the local communities in a harmful, and expensive manner.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting), EJSOC01-General	Discussion of impacts on individuals who rely on wood product harvesting for heating sources and other uses are included in the EIS in the Environmental Justice section of Chapter. See the Alternatives for Forestry and Woodlands table in Chapter 2 for management actions regarding wood product harvest under the Proposed Plan.
18982-4	Daniel Kent 399 E 100N Moab, 84532	Friend of the Abajos	Consistent with the above and with Native American values, commercialization and development should be very limited and always done in a way to honor, protect and enhance primitive opportunities for solitude, worship, and nature interaction, including traditional harvest and other non-commercial extractive uses. Wood gathering should be limited to existing areas of harvest and existing roads and those places the agencies deem will BENEFIT from firewood harvest. The current free-for-all situation on cedar Mesa is doing outrageous amounts of destruction to cultural and ecological resources and is severely impacting aesthetics and old trees that are being unsustainably	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The range of alternatives analyzed in the RMP/EIS include varying levels of vegetation management and methods and determined areas where wood product harvest could occur to be consistent with the proper care and management of Monument objects. Authorizations for private use of wood products would continue to be issued to the public in accordance with applicable law, consistent with the availability of wood products and the protection of resources. Agencies would coordinate with the BEC and Tribal

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			removed and are often the basis of the best shady camps in the monument. If this is going to be claimed as a traditional use, then it should be harvested without pickups, chainsaws and other motors.		Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of Tribal Nations.
1906-9	Morgan Sjogren		A permit system needs to be created for woodcutting and harvesting. Pinyon and juniper trees both are slow-growing. I have witnessed overharvesting on the monument, as well as careless driving off designated roads to harvest wood. Both the amount and location of wood harvesting need to be regulated and monitored, but I fully support people's continued need to do so, especially local San Juan County and Indigenous communities who require the wood for a source of winter heat.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Management Actions Common to All Alternatives for woodland and forestry resources states "authorizations for private use of wood products would continue to be issued to the public, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations. This coordination would also, if appropriate, include identifying areas for seasonal or multiyear closures to allow regeneration of woodlands or to provide for traditional or ceremonial uses as appropriate."
3123-9	Russell Bodnar 5A Road 2976 Aztec, 87410Tracy Bodnar		A firewood harvesting permit system for woodcutting should be implemented with Tribal consultation and leadership in how the system is designed and allocated.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Management Actions Common to All Alternatives for woodland and forestry resources states "authorizations for private use of wood products would continue to be issued to the public, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations. This coordination would also, if appropriate, include identifying areas for seasonal or multiyear closures to allow regeneration of woodlands or to provide for traditional or ceremonial uses as appropriate."
3125-21	Steve Knox		Page 2-30, Forestry and Woodlands, Table 2-7, Management Actions Common to All Alternatives, 7th bullet I commend you, and support your finding the entire BENM not suitable for commercial timber production. Given the objects the Proclamation serves to protect, commercial timber production would be incompatible with protection and preservation of the NM objects. Page 2-30, Forestry and Woodlands, Table 2-7, 4th 2020 ROD/MMP action, Alternative E This action says Emphasis would be to not provide for commercial timber harvest in BENM unless to protect BENM objects. This wording does not exclude providing for commercial timber harvest for other purposes, and therefore is not consistent with the 7th action Common to All Alternatives that says the entire BENM is not suitable for commercial timber production.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	Commercial timber production and commercial timber harvest are not equivalent definitions. Under all alternatives BENM would not be suitable for commercial timber production but could still be available for commercial timber harvest when appropriate to protect BENM objects. Please see the glossary for definitions of timber production and timber harvest.
3125-22	Steve Knox		Page 2-30, Forestry and Woodlands, Table 2-7, 6th 2020 ROD/MMP action, Alternative E Wood product harvest may not be appropriate/consistent with other resource values, goals, and objectives (VRM Class 1 management areas, LWC, WSAs, Wilderness, IRA, RNAs, et al). Add consistent with other resource values/uses goals, objectives, and actions.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	Authorization for the private use of wood products would be consistent with the availability of wood products and the protection of other resource values. In the Alternatives for Forestry and Woodlands table in Chapter 2, under the Proposed Plan BENM would be available for wood product harvest in accordance with applicable law, unless otherwise specified, and not including designated wilderness, wilderness study areas, research natural areas, Dark Canyon and Indian Creek Management Areas, the eastern rim of Indian Creek including the Needles and Anticline overlooks, livestock/wildlife exclosures, cultural sites and developed recreation areas.
3125-23	Steve Knox		Page 2-30 and 2-31, Forestry and Woodlands, Table 2-7, 7th 2020 ROD/MMP action, Alternative E since you are managing LWC for their wilderness values, you should include these places for dead and down campfire wood collection along with the other wilderness category lands.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Proposed Plan would not allow wood product harvest in WSAs but would allow wood product harvest and on-site collection of wood for campfires in LWC. Limited on-site collection of dead wood for campfires would be allowed in wilderness, WSAs and IRAs except in the Dark Canyon Management Area within the Remote Zone, Cedar Mesa Backpacking Sub-Area, White Canyon Canyoneering Sub-Area, Indian Creek Management Area, Indian Creek ACEC, Lavender Mesa ACEC, a portion of Cottonwood Canyon near Bluff and a portion of Outlaw Canyon near Bluff.
7339-5			A firewood harvesting permit system for woodcutting should be implemented with Tribal consultation and leadership in how the system is designed and allocated.	FOREST02-Wood Product Harvest (Wood Gathering, Wood Collecting, and Timber Harvesting)	The Management Actions Common to All Alternatives for forestry and woodland resources states "authorizations for private use of wood products would continue to be issued to the public, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations. This coordination would also, if appropriate, include identifying areas for seasonal or multiyear closures to allow regeneration of woodlands or to provide for traditional or ceremonial uses as appropriate."
18713-8	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	The DEIS states, Wood harvesting impacts community air quality in winter, but there is no mention of traditional or spiritual importance of wood. See Justice section on page 3-366 of the BENM DEIS and Section 3.4.6 and Section 3.4.14 for more information. Several years of research has been carried out by the University of Utah and Utah Din Bikyah which has resulted in several published and unpublished articles and reports with recommendations on how to ensure traditional firewood collection can co-exist alongside ecologically sensitive forest management. See Appendix 1.	FOREST03-Traditional and Ceremonial Use	Authorizations for private use of wood products would continue to be issued to the public in accordance with applicable law, consistent with the availability of wood products and the protection of other resource values. Agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest and to provide fuelwood for members of the Tribal Nations.
17807-6	Janet Slowman Chee Box 315 Bluff, UT 84512	Utah Dine Bikeyah	Wood cutting allowance, how do will young, specific wood used for healing be protected	FOREST03-Traditional and Ceremonial Use, ALT05-Alternative E	BENM would be available for wood product harvest in accordance with applicable law with the exception of some specific areas as outlined in the Proposed Plan. The agencies would coordinate with the BEC and Tribal Nations to identify appropriate areas for wood product harvest. Wood product harvest, including wood for healing purposes, would be allowed with authorization. See the Alternatives for Forestry and Woodlands Table for actions related to firewood permits and fuelwood reduction use in restoration projects.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
16994-1	Susy Ellison		Cedar Mesa has long been a source of firewood for the nearby tribes. This practice is part of a long tradition and needs to be managed and protected in partnership with Tribal leadership. Development of a system that preserves the right to cut firewood while protecting the landscape should be a goal within the plan.	FOREST03-Traditional and Ceremonial Use, ALT07-Modification of Existing Alternatives	In the Proposed Plan portions of Cedar Mesa would remain available for fuelwood collection, following applicable law. See the Proposed Plan under the Forestry and Woodlands section in Chapter 2. The agencies would collaborate with the BEC about implementation decisions for areas available for fuelwood collection.

Table U-31. Wild and Scenic Rivers

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
17617-4	Joe Neuhof PO Box 338 Bluff, 84512	Bears Ears Partnership	We support implementing slightly more protective management prescriptions to 3 of the 4 WSRs under Alternative E, by upgrading from VRM Class II to Class I, changing from ROW avoidance to exclusion, and by prohibiting motorized boat use within the San Juan River Segment. We agree that these management changes are necessary to adequately protect and enhance the identified ORVs of these segments, by limiting visual, noise, sedimentation, vibrations, oil spills, ecological disruption, and wake impacts. Colorado River Segment 3 already has these protections, so management would remain the same under Alternative E.	WSR01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan outlines management for four Suitable WSR segments in the Planning Area as VRM Class I and ROW exclusion areas and prohibits motorized use on San Juan River Segment 5 except in emergency situations and administrative exceptions. Suggestions are within the range of analyzed alternatives.

Table U-32. Wilderness Study Areas

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18238-38	Chaitna Sinha		According to the WSA management matrix in Chapter 2, there is no difference between Alternatives B-E. In fact, in Chapter 2, the Matrix states that Alternatives B-D are the same as Alternative E. Id., p. 2-42, Table 2-18. In the FEIS and final plan, the BLM must ensure that under all action alternatives WSA lands released by Congress will continue past management, in collaboration with the BEC, to ensure non-impairment of wilderness characteristics and protection of BENM objects and values. We propose: We support Alternative Es management action with the following improvements (in bold): When any WSA, in whole or in part, is released from wilderness consideration by Congress, continue past management of such released lands, unless otherwise specified by Congress in its releasing legislation, in a manner to ensure protection of BENM objects and preserve their wilderness characteristics, and in collaboration with the BEC. The following would occur: 52 Re-inventories for wilderness characteristics of all released WSAs not designated as wilderness; all lands determined to have wilderness characteristics, in collaboration with BEC, would immediately be managed to protect wilderness characteristics. Until the above are completed, and all steps necessary have been completed to establish management of the released areas moving forward, no proposals/actions would occur in the released areas unless essential for the protection of BENM objects and preservation of wilderness characteristics. Any proposals/action would be done in collaboration with the BEC. Following such interim steps, the agencies, in collaboration with the BEC and Tribal Nations, would conduct an amendment to the RMP/EIS, with accompanying NEPA analysis, to determine how those lands would be managed in the long term. [see letter for emphasis]	WSA01-General, ALT05-Alternative E	Comment suggests a style change with no substantive change in meaning. No change.
18238-39	Chaitna Sinha		According to the DEIS, [a]s per State of Utah v. Andrus, October 1, 1979 (Cotter Decision), the BLM would grant the State of Utah reasonable access to state lands for economic purposes on a case-by-case basis. Id., p. 2-73. We propose: To best protect Monument objects and values and prevent user conflicts, we propose the following changes to this management action in bold: As per State of Utah v. Andrus, October 1, 1979 (Cotter Decision), The BLM would grant the State of Utah reasonable access to state lands for economic purposes on a case-by-case basis and in consultation with the BEC. In most instances, administrative use designations are sufficient to provide access to State and Private lands and may best protect Monument objects and prevent user conflicts. [see letter for emphasis]	WSA01-General, ALT05-Alternative E	Comment suggests a style change with no substantive change in meaning. No change.
15439-8	Jason Keith Moab, UT 84532	Access Fund	Wilderness Study Areas The Climbing Organizations support protecting Wilderness Study Areas (WSAs) to retain their wilderness character. At Indian Creek the only WSA is located at the top of Bridger Jack Mesa (a location that attracts very few climbers) and thus the highly protective management requirements for this WSA will have little impact on recreation management. There are, however, several additional WSAs throughout the BENM that include existing climbing and canyoneering routes, such as the Indian Creek, Cheese Box Canyon, Road Canyon, Mule Canyon, Butler Wash, and Grand Gulch WSAs. BLM Wilderness Study Areas are of significant interest to climbers and canyoneers because BLM Manual 6330Management of Wilderness Study Areas states that the placement of permanent fixed anchors (e.g., bolts) or artificial holds is not allowed unless it meets one of the exceptions to the non-impairment standard, e.g. for emergencies, such as search	WSA01-General, REC01-General	Under the Proposed Plan, climbers will be permitted to replace bolts, anchors, and fixed gear as needed without prior authorization on existing climbing and canyoneering routes. See Impacts Common to All Alternatives under the Recreation Use and Visitor Services section. Placement of bolts, anchors, or fixed gear are considered across all alternatives. Climbing equipment, including fixed gear cannot be used to access cultural sites.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			and rescue operations. Any impacts from emergency actions must be restored to a substantially unnoticeable condition following the emergency situation. Generally, fixed anchors placed prior to FLPMA will not be removed unless their presence creates directly or indirectly impacts that exceed the non-impairment standard. Without the ability to place and replace anchors, climbers and canyoneers will in many cases lose practical access to WSAs (totaling nearly 380,000 acres in the BENM) because of the need for an occasional safety anchor for rappelling and ascending. The BLM should assess existing climbing and canyoneering areas in BENM WSAs that may include fixed anchors to determine that their presence is substantially unnoticeable and do not impair wilderness character. Thus, because these areas remain eligible for wilderness designation, the rare fixed anchor should be permitted consistent with BLM Manual 6330. In the case of the Bridger Jack WSA at Indian Creek, its boundary is located at the top of the cliffs at the popular Bridger Jack Mesa (just above the high point of climbs) therefore there is no management issue restricting the ability of climbers to maintain climbing fixed anchors. Irrespective of where the WSA boundary is located, all climbing anchors existing within BENM at the time of this RMP should be allowed to remain. BLM management of Lands with Wilderness Characteristics should likewise not preclude the placement of climbing anchors and other climbing infrastructure.		

Table U-33. Travel Management

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19000-1	Doug Allen		I am very much opposed to the closure of the Arch Canyon road. Closure would prohibit many people from access to this beautiful and popular canyon. It particularly affects those of health, age and ability who would be unable to hike into the canyon. It also would prohibit two commercial tour outfitters of San Juan County livelihood. It is the number one favorite of those who come to the annual ATV Safari sponsored by Blanding, Monticello City and SPEAR, a group of ATV people who promote responsible trail riding. There are many opportunities for those who want to hike to do so without interference from motorized vehicles. I do not think that these people are a threat to cultural sites.	TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning, agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
19001-3	Bruce Lyman bjlyman61@gmail.com		I'm opposed to the restricting of access to areas in the Monument through the closure of existing roads and trails and making them available only to those on foot. There was a time that I could hike long distances but those days have come to an end. The only way I can access areas of the monument that I have been going to for decades is now by motorized vehicle. Just in the past few years I have taken in close to 100 people to explore the canyon all of whom would not have been able to experience this place if they would have had to walk in. There are hundreds of miles of trails within the Monument that are strictly limited to foot traffic. Arch Canyon is the perfect example of an area that now currently can give everyone the experience they are looking for. For those who want to see it by motorized vehicle you can, up to the forest service line where it becomes a trail only for those on foot or horse back. While those who want to hike in might have to share with the rest of us for a few miles once you reach the forest boundary you can hike for several days in the two canyons that take off at the end of the motorized road. I would like to point out that the past couple of years I have been making a mental note of who I see on the trail. I have seen people on horseback, ATV's, jeeps and pickups, side by sides, mountain bikes, E-bikes, and day hikers. The only group I have yet to see is backpackers. Now maybe I have just missed them but since Arch Canyon is being targeted for closure to motorized vehicles to enhance the experience of backpackers maybe we would be seeing a bunch of them currently using it. I'm not seeing it. Arch Canyon is a special place, it's a spiritual place that needs to remain accessible to as many people as possible.	TRAVEL01	The BLM manages motorized recreation in accordance with applicable law and the Rehabilitation Act. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning, agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
19002-4	Maury Bergman bergmanmaury@gmail.com		I oppose restriction to areas in the Monument in the form of road closers and restricting access to land or making it only available to foot traffic. This incapacitates the use and enjoyment for the majority of the public. Most people cannot hike the distance to relish what the Monument has to offer. Eliminating motor vehicle access also eradicates the majority of Indigenous people to their ancestral lands because they can't hike the distance to see them, gather wood or perform other cultural activities. This again contradicts the purpose of the Proclamation.	TRAVEL01	Because recreation is specifically excluded as a Monument object to be protected in Proclamation 10285, the expansion of recreational access, unless for the specific purpose of protection of BENM objects, does not meet the purpose and need. The Proposed Plan includes six Management Areas and seven Sub-Areas, each of which has an objective of managing recreation consistent with the protection of BENM objects. See Appendix E, which identifies allowable recreational activities, as well as the Management Actions and Implementation Level Actions. Those actions support the desired conditions and the uses in each of the Management Areas and Sub Areas. This includes improved infrastructure in Front Country Zones, development of backcountry trailheads to support protection of BENM objects, and improved interpretation throughout BENM. Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources and Geology section in Chapter 3 for a discussion of impacts of OHV designations on paleontological resources.
19008-1	Bayley; George; Kevin; Kirk; Nathan; Ron Chamberlain; Crowley; Dunn; Hedglin; Rice; Skinner info@monticelloutah.org	City of Monticello	One of the proposed options for management of BENM is to close off access to Arch Canyon for motorized vehicles. We object to this closure in the strongest way possible. This seems narrow-minded, and we feel that the BLM, and all interested parties, can come together with solutions that would preserve and protect the natural resources found there without outright closure. Motorized vehicles have been traveling in this canyon for many, many years, and yet the cultural artifacts, wildlife and plant life seem to be holding their own. With a little bit of planning and additional education, there is no reason why this area can't continue to be enjoyed by all. This canyon is one of the most popular attractions to visitors to our area and closing it could have a significant economic impact to San Juan County as a whole.	TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning, agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
19017-19	Sylvia Stubbs	San Juan County	p. 2-116 Management Actions Common to All 1st bullet, 2nd sentence: Add State as in "Agencies would coordinate with State and local government and the BEC ... ".	TRAVEL01	The agencies revised the description of travel management actions common to all action alternatives in Section 2.4.21.2 to clarify that the agencies will coordinate with the State for this implementation-level plan.
19017-22	Sylvia Stubbs	San Juan County	In 1990, BLM made an Administrative Determination recognizing the County's claim to an RS2477 Right-of-Way for the Arch Canyon Road and determined that the road was a public highway under this statute. Although this determination was contested and is still under litigation, BLM has continued to recognize and affirm the public's right to motorized use of this road and has periodically concurred with maintenance of the road by the County. In 2012, BLM authorized the County to re-route the lower section of this road under a Title V Right-of-Way Grant so the road would bypass a flooded area. San Juan County does not support a closure of Arch Canyon to OHV use.	TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
19017-37	Sylvia Stubbs	San Juan County	p. A-89 Figure 3-40 Current Travel System Ride with Respect has brought to our attention that this map inaccurately labels at least 15 motorized routes on the National Forest as being non-motorized. We have checked their observations and have found that the following routes are mislabeled as non-motorized (using National Forest road/route numbering system): 203 - off Heifer Mesa Trail 008 - off Maverick Point into North Cottonwood 5067 - old mining roads west side of North Cottonwood 5069 - " 5070- " 445 - Gooseberry to South Cottonwood 938 - south off North Long Point Road 939 - to end of Poison Point 940 - off 5163 head of Drift Trail Canyon 942 - complex SW of Dry Wash Reservoir 10 455 - off Causeway Road E of Bayles Ranch 456 - ., 489 - off Kigalia Point Road to west 023 - North off Dry Mesa Road 482 - off Elk Ridge Road SW of Bears Ears Please correct this map to reflect road status on the current travel plan.	TRAVEL01	The USDA Forest Service reviewed the noted figure and found no inaccuracies in the routes shown.
19017-38	Sylvia Stubbs	San Juan County	p. H-1 Section 1 BLM Travel Management Plan Criteria for Area Designations The 43 CFR section referenced here appears to be a typographical error. Rather than 43 CFR 8343.1 it should be 8342.1.	TRAVEL01	Thank you, this error has been corrected in Appendix H.
19019-5	D Schier		I would like to state at the outset that I do not support any effort to exclude motor vehicles from the areas of Arch Canyon or other areas of Bears Ears National Monument where they are currently pennitted. I understand that it can be demoralizing to be sweating your way into Arch Canyon with a heavy backpack, only to be passed by a group of people traveling in the air conditioned comfort of their SUV. Yet I have learned to understand that other people have other methods of enjoying public lands, so I greet these other visitors with a wave and a smile, and find that they are friendly and helpful, often checking on my welfare and offering me water when I am hiking far from my vehicle. I would suggest that visitors who find motorized travel objectionable need to readjust their expectations and work to cultivate a more understanding perspective.	TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions
19022-2	Jessa Watkins		I love Dark Canyon, and think it should be preserved as a remote area with very limited use of OHVs. Last year, we entered the canyon via the Peavine Corridor, and were dismayed to find OHV tracks that extended far beyond the wilderness boundary/area NOT designated for OHV usage.	TRAVEL01	Closing the motorized route in the Peavine corridor is not being proposed in this Plan. The route was "cherry stemmed" within the Dark Canyon Wilderness, but that does not relieve the USDA Forest Service from ensuring that the route does not have impacts on the important riparian resources and Monument object located within the Peavine Corridor.
19025-1	Terri Liechty		My grandfather was the first white settler in Blanding. His father led the pioneers to Bluff. They were cowboys together in all the local area, including Arch Canyon where they kept their cattle. It is imperative that our access to the canyons remain possible so that I can expose my little grandchildren (who cannot hike it but can ride there) to their heritage.	TRAVEL01	The BLM manages motorized recreation in accordance with applicable law and the Rehabilitation Act. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions
19026-1	Brian Carlstrom	National Park Service	The NPS believes that Alternative D is more protective of the natural soundscapes around the CANY and NABR areas, as it proposes to close OHV routes near and abutting the park boundary. Also, this alternative would mitigate impacts from illegal OHV ingress into CANY. In desert environments with limited vegetation, noise can travel farther, and cause potential impacts to, wildlife behavior and use of habitat, and potential impacts to visitors wanting to experience quiet and solitude, as well as indigenous members seeking natural quiet needed for native and sacred practices. Limiting OHV use in these areas could help reduce noise impacts to the adjacent NPS units of NABR and CANY, protecting the acoustic environment.	TRAVEL01	Under all action alternatives, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. See the Management Actions by Alternative section of the Travel and Transportation Management section of the Proposed Plan for OHV area designations. See the Cultural Resources, Natural Soundscapes, Recreation and Visitor Services sections in Chapter 3 for a discussion of impacts on cultural resources, soundscapes, and recreation from travel and transportation action.
19026-24	Brian Carlstrom	National Park Service	A-45 (Chpt 2 Figures) OHV Routes Would be helpful to have NPS units outlined and labeled on map to understand how close open OHV routes would be to National Park units in order to guide soundscape monitoring and potential impacts, future mitigations to protect wildlife and visitor experience.	TRAVEL01	An interactive map is available and allows viewers to turn on/off background layers with different emphases, including surrounding land ownership and allows viewers to specifically navigate to specific location with more detail and clarity compared to the constraints on the scale of the maps in the document.
19026-37	Brian Carlstrom	National Park Service	2.4.21 2-116 Table 2.20. Row 1 Recommend Alternative D, as it is more protective of natural soundscapes around CANY and NABR by proposing to close OHV routes near and abutting the park boundary. Also, this alternative would mitigate impacts from illegal UTV/ATV ingress into CANY	TRAVEL01	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. Under all action alternatives, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. See the Management Actions by Alternative section of the Travel and Transportation Management section of the Proposed Plan for OHV area designations. See the Cultural Resources, Natural Soundscapes, and Recreation and Visitor Services sections in Chapter 3 for a discussion of impacts on cultural resources, soundscapes, and recreation from travel and transportation action.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
19031-2	Liz Robinson		Vehicle Routes: In the final plan, ORVs should be kept out of streams and washes, where they have damaged riparian wildlife habitat. Vehicles should be banned from these specific areas: Arch Canyon - My brother witnessed ORVs driving in Arch Canyon when he hiked there. They left thick dust on the ground and on vegetation, and they left a sheen of engine fluids on Arch Creek. The soils were eroded where vehicles entered the creek. Lavender and Davis Canyons - Both canyons should be closed to vehicles, so the vegetation can recover. There again, vehicles have degraded the riparian habitat. Comb Ridge also should be strictly closed to ORVs. It is an area most valuable to visitors walking from the Butler Wash road up to the edge of the cliffs. Soils on Comb Ridge are thin and vulnerable to erosion. Vegetation exists in scattered mini-habitats that would be easily destroyed if vehicles were allowed.	TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. Route by route travel planning will be completed under an implementation level Travel Management Plan. Implementation-level travel planning would not designate new motorized and mechanized routes in riparian areas, wetlands, and water resources unless necessary to ensure the protection of BENM objects and in collaboration with the BEC. Implementation-level travel management planning would ensure motorized and mechanized routes that parallel or cross streams would be located to best complement riparian and aquatic ecosystems as well as road/trail and stream geometry. This includes locating crossings (fords) at points of low bank slope and firm surfaces wherever practicable. Improvements to routes, including potential reroutes or alternative alignments, to provide for public health and safety needs and/or to protect BENM objects, would be considered during plan implementation on a case-by-case basis, in accordance with agency policy. See Appendix H: Travel Management Plan Criteria.
19037-1	Gary; Joan Powell		ARCH CANYON is a county road. It gets its funding for maintenance from Utah State. What gives the BLM and the Forest Service the right to seek closure? San Juan County isn't seeking to close Arch Canyon. The local government has expressed their desire to keep these places open for tourists visitors, and the locals. Arch Canyon is used in the San Juan Safari. There is an economic impact for the county for the people to come here and enjoy, explore, and appreciate what is there. It is The Federal Land Manager's responsibility to consider and cooperate with local and state governments. To close county roads is a federal government OVERREACH.	TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
19039-1	Arden; Marie Mortenson		We are appalled at the idea of closing Arch Canyon because some backpackers want an unincumbered by motorized vehicles hike into such a beautiful area. That in and of itself is PURE DISCRIMINATION. ALL public land belongs to ALL THE PEOPLE. There are literally hundreds and hundreds of miles of country available to backpackers and hikers, with NO MOTOR VEHICLES allowed, in your area. We are defiantly in favor of caring for our land and do so each time we ride.	TRAVEL01	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
19043-4	William Skelton whshome@bellsouth.net		The Dark Canyon Airstrips (Dark Canyon North 37.89585-110.089 and Dark Canyon South 37.8242-110.09) are dubious improvements to leave in the Monument. There are other trailhead accesses to these areas and the South strip really does not provide access to any canyons.	TRAVEL01	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
19043-5	William Skelton whshome@bellsouth.net		I support Alternative E's closure of Arch Canyon to motorized use. I have backpacking in Arch Canyon and it is a treasure of the Monument. In addition, Alternative E should expand closure areas to protect the Monument's most significant resources that are at risk from motorized vehicle damage.	TRAVEL01	The Management Actions By Alternative section in the Water Resources section in the Proposed Plan includes management actions for the protection of water resources. Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources and Geology section in Chapter 3 for a discussion of impacts of OHV designations on paleontological resources The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
19026-15	Brian Carlstrom	National Park Service	3-441 Table 3-139 Travel/Transportation - OHV Seems like Alt D for OHV use would be more protective of soundscapes - the acoustic environment and related natural n cultural resources and values, including Tribal concerns. Has the BLM considered modifying the preferred Alt. E for the OHV element - mix/match - use Alt. D option for OHV? Also, see Table 3-63, Alt D protects soundscapes more than Alt E or any other alternative.	TRAVEL01; YES06	See the Transportation and Travel Management section of the Proposed Plan which was developed in collaboration with the BEC and Tribal Nations. Potential impacts of the Proposed Plan are described in the Natural Soundscapes section of Chapter 3. The Proposed Plan is written in accordance with Proclamation 9558 and 10285, which include the description of Monument objects and the Proposed Plan protects those objects, including cultural resources. In the Proposed Plan, cultural resources include wildlife, springs, water, and other resources important to Tribal Nations.
889-58	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Closing the interior corridor of Moon House to visitors will significantly lessen the quality of the visitor experience when visiting the site and will harm the overall visitor experience for the entire monument, by depriving users of one of the principal attractions of the monument. The DEIS does not include any discussion of why this prohibition is necessary and does not give any evidence that the current rules have not been sufficient to protect the site. NEPA requires a clear showing that agency decisions are supported by factual evidence and those decisions cannot be justified solely by speculative harm. Really the only reason given at all is that the tribes in the BEC view visitors accessing the interior of ruins to be inappropriate, which is solely a matter of opinion. Because the DEIS does not provide any factual support for this prohibition, it is by definition arbitrary and capricious. We urge the agencies to remove this rule from the final management plan and adopt the management actions from either	TRAVEL01-General	Although inadvertent, impacts from visitation do occur every time a visitor enters the interior corridors of Moon House. The Cultural Resources section in Chapter 3 has been updated to describe the impacts to Moon House and cultural resources generally. Additionally, Moon House, while an important recreation destination for visitors, is not the most visited or most popular archaeological site in BENM. Visitation to Moon House will still occur under the Proposed Plan under an allocated permit system, like current management, but access to the interior corridor will be prohibited. This was analyzed in the management plan and this action will help preserve the site for future generations.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			alternative A or C regarding Moon House, which would continue to allow public access to the interior corridor of the site.		
889-21	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The Bears Ears National Monument management plan will inevitably provide bearing on and address the validity of R.S. 2477 assertions. BLM manual MS-1626 Travel and Transportation Management Section 6.2 states, A travel management plan is not intended to provide evidence, bearing on, or address the validity of any R.S. 2477 assertions. R.S. 2477 rights are determined through a process that is entirely independent of the BLM's planning process. In these proceedings, whether routes have existed historically and whether they currently exist on the ground are part of the evidentiary record for R.S. 2477 claims. A closure of an R.S. 2477 route through a management planning process provides bearing against the validity of any R.S. 2477 assertion by erasing the primary source of evidence upon which these assertions rely: the continued existence of the route itself. As such the closure of R.S. 2477 routes through the TMP process violates MS-1626 (6.2).We recognize that RS 2477 claims cannot be adjudicated through an administrative process, but we also recognize that closing R.S. 2477 routes through an administrative process will bias any future adjudication, and closures of these routes should be avoided at all costs until any contested route can be thoroughly adjudicated. At the very least, BLM should develop an alternative that keeps all of these routes open. The closure of R.S. 2477 routes also creates an undue burden on active mining operations, and BLM Manual 2801.8(G) requires BLM to Recognize as an authorized use, any ROW facility constructed on public land on or before October 21, 1976, under the authority of any act repealed as to future authorization by FLPMA. No further authorization is required by the holder for [] b. A ROW for a public highway constructed on public land under R.S. 2477.	TRAVEL01-General	Per 43 CFR 8342, the BLM designates areas of public land as open, limited, or closed to OHV use; during the land use planning process. The Proposed Plan includes management action regarding reasonable access and authorized administrative use in the Management Actions Common to All sections in the Lands and Realty and Travel and Transportation Management sections in Chapter 2. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
8992-10	Olivia Juarez 1919 14th St, Suite 700 Boulder, CO 80302	GreenLatinos	We support Alternative Es limit on OHV travel to designated routes for wood gathering or up to 150 feet of a road on Forest Service lands with proper authorization to prevent the loss of on-ground resources and species. In the same vein we also support Alternative Es approach to manage new or existing travel routes to protect habitat for culturally and ecologically important species and prohibit new roads, trails, or other recreation development that might fragment or disturb wildlife habitat. We support the closure of Arch Canyon in Alternative E, and encourage the BEC and agencies to also close routes in BLM-administered lands managed for wilderness characteristics, especially where there is a significant opportunity to promote the health of water, wildlife habitat, sites for Tribal ceremonial or other religious use, and conserve historical resources. In other words, we would support the maximum amount of OHV closure on BLM-administered lands managed for wilderness characteristics except where a closure would directly prevent Tribal Nations continued return to an area for cultural purposes.	TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the motor vehicle use map. See the Paleontological Resources and Geology section in Chapter 3 for a discussion of impacts of OHV designations on paleontological resources. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
10-1	Lisa Potter	Colorado 4x4 Girls	I truly do not understand why theres a continuous push to close existing motorized trails we have seen this happen time and time again since the 1980s. Yet these thousands of miles of closed trails are NOT reported /recorded to show the true percentages of road/trail closures! The percentages need to be corrected and the roads that have been closed in the past need to be counted in the percentages so it shows that percentage of our trails that have been closed, not just the current percentage that the plans propose. When areas are being reviewed in the process they MUST have accurate information in the documents. ALL existing open motorized routes must be document and shown. And for full disclosure the road that have been previously closed during other reviews should be accounted and shown as well - to show full existent of trail/road closures.	TRAVEL01-General	The existing authorized travel network is described under the affected environment and analyzed under the No Action Alternative. Specific road designations (including open, limited, or closed) are implementation-level decisions that are not addressed at the planning level in the RMP/EIS. Implementation-level planning will be consistent with the management direction in the approved RMP and Presidential Proclamations 9558 and 10285.
10626-1	Debra Van Putten		Closing any area in Bears Ears to 4x4 use (OHV) effectively closes the area to all access except walking, and given the size of the Monument, how arid it is and how difficult the terrain, walking is not a practicable option. Make no bones about it. Closing to land OHV use is essentially closing that land to human presence for all but the most fit people.	TRAVEL01-General	The Proposed Plan designates 591,185 acres as OHV closed, 201,540 acres more than current management. Approximately 32 miles of designated route would be within the OHV closed area. Approximately 726,594 acres would be managed as OHV limited. See the Environmental Consequences section in the Travel, Transportation, and Access Management section in Chapter 3 for a discussion of impacts of travel management area designations on the travel and transportation system and BENM resources.
1188-1		Recreational Aviation Foundation	Please do not restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode, and these strips have been open for many decades without incident. Access to the backcountry out west is being restricted on a daily basis. What good is creating all of this wilderness if no one can enjoy it? Public land should be available to the public	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1189-1	Robert Hale		Please do not restrict access to the existing airstrips in the BENM. General Aviation has one of the smallest environmental impacts of any transportation mode. Access to the backcountry out west is being restricted on a daily basis. What good is creating all of this wilderness if no one can enjoy it? Public land should be available to the public and not opened widely to broad commercial interests.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1322-1	M Christensen		My comments are in regard to the closing of the airstrips in the Bears Ears National Monument. I oppose the closure of these strips as there is historical use on these strips by backcountry recreational pilots. These are recreational assets to be used by all citizens and should not be closed. There are many other airstrips located in and around wilderness areas, national parks and national momuments that co-exist with other users. Examples are the Frank Church Wilderness area in Idaho and Grand Teton National Park. Recreational pilots are respectful and their impact is limited to a very small area. Backcountry airstrips allow recreationalists to access backcountry that would otherwise not be accessible. Please do not close these strips.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1340-1	Karen Austermiller, Daryl Austermiller		The proposed closure of airstrips makes no sense, as they are lightly and responsibly used and have been for the past up to 70 years in some cases. General aviation users are very responsible, clean users of the land for airstrip camping, practice leave no trace and have a very small footprint, requiring no road access. Volunteers in organizations like the Recreational Air Foundation (RAF) are organized and maintain many airstrips, negating any need for BLM expense. Airstrips are situated on natural flat land features, such as level, open meadows with little occurrence of soil disturbance or erosion, as opposed to damage caused by RV type vehicles in disbursed camping situations. All of these airstrips should remain open, and the BLM should work with the RAF to work out a volunteer maintenance plan.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1380-1	Lane Livingston		I respectfully urge the Bureau of Land Management to recognize the value of these airstrips and to support their continued use and maintenance. By doing so, we can preserve the unique opportunities and privileges that flying in the Utah Backcountry offers and ensure that future generations can experience the awe-inspiring beauty of Bears Ears National Monument.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1380-2	Lane Livingston		The Utah Backcountry, particularly the area encompassing Bears Ears National Monument, offers a distinctive flying experience that is hard to find elsewhere. The diverse landscape, ranging from expansive deserts to rugged canyons and majestic mesas, provides pilots with breathtaking views and challenging yet rewarding flying conditions. The airstrips within BENM serve as vital access points for pilots to explore these remote areas responsibly and sustainably. One of the most significant privileges of flying in this region is the opportunity to access remote and pristine areas that are otherwise difficult to reach. This access allows pilots to engage in a variety of recreational activities, such as hiking, camping, photography, and wildlife observation, all while minimizing their impact on the environment. The airstrips facilitate short-term stays that reduce the need for extensive ground-based infrastructure, thus preserving the natural landscape and minimizing human footprint. Moreover, the use of these airstrips supports a diverse range of activities that contribute to the local economy and foster a deeper appreciation for the natural and cultural heritage of Bears Ears. Aviation enthusiasts, tourists, and researchers alike benefit from the ability to reach these remote areas efficiently. This access also plays a crucial role in emergency situations, providing essential support for search and rescue operations and facilitating rapid response to medical emergencies in remote locations.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
1380-3	Lane Livingston		The airstrips within Bears Ears National Monument are not just landing spots; they are gateways to adventure, exploration, and a deeper connection with nature. They embody the spirit of freedom and discovery that is intrinsic to the American wilderness experience. By allowing continued access to these airstrips, the BLM can ensure that pilots and outdoor enthusiasts can enjoy the unique privileges of the Utah Backcountry while maintaining the integrity and beauty of this remarkable landscape.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1415-1	Shane Adair 394 PR 2610 Meridian, TX 76665		As a backcountry flyer Im saddened to hear about the BLM wanting to close valuable backcountry assets in the Bears Ear area of UT. Please understand that once closed they will most certainly have slim hope of being reopened. The cost and manpower would be overwhelming. Please consider the help and expertise the Recreational Aviation Foundation can afford in keeping these wonderful strips open.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1416-1	Douglas Lumgair PO Box 311 Windsor, CA 95492		I very strongly encourage keeping all potential air strips open!	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15065-4	William Murrow 2060 State Highway 595 Lindrith, NM 87029		Some people might be concerned about possible noise issues. Note that during landings the backcountry aircraft are using low power and thus landings are usually very quiet. And takeoffs are of a short duration, especially compared with other vehicles such as ATVs or dune buggies where the noise can go on and on for extended periods. And the recreational users camping from aircraft are very much like backpackers. They dont carry or operate noisy electrical generators that disturb the natural quiet, especially at night!	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1522-1	Kenneth Climie		Keep Airports in Utahs Bears Ears National Monument (BENM) open to the public, no closures. As a taxpayer, aircraft owner, and pilot my expectation is that the BLM will act in the public best interest to allow access to remote areas by any means reasonable. Aircraft are far less destructive to the environment than side by sides and dirt bikes.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1526-1	Brian Bouchard		I would like to voice my opinion that non-commercial fixed wing recreational aircraft continue to be given access to the Bears Ears National Monument airports and airstrips.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1535-1	Joe Preston		I think all of these airstrips should be left open and accessible to the public. They provide options for emergency landings and services such as fire suppression and medical emergency. They do little damage to the environment as compared to four and two wheel ground vehicles. They have been open for decades and have proved their worth in multiples. There is no good reason to close any of them.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
1537-1	James Mitchell		Please do not restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode, and these strips have been open for many decades without incident.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1539-1	Philip Mandel		I write today to encourage you to PRESERVE UTAHS SCENIC BACKCOUNTRY AIRSTRIPS. Please do not restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode, and these strips have been open for many decades without incident. Access to the backcountry out west is being restricted on a daily basis.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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			What good is creating all of this wilderness if no one can enjoy it? Public land should be available to the public!		aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1540-1	Connor Wilkinson		I am writing to comment on the potential closure of rural airstrips in Utah. These include Valley of the Gods, Long Canyon, Deer Flat, and others. I vehemently oppose the closure of these airstrips.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15474-2	Therese Bohusch, Jeff Franklin		Aircraft owners and operators, by nature of their aircraft load limits and takeoff and landing requirements, impact the landscape with a lighter footprint than other recreation vehicles and users. We often marvel at the remote and austere locations with nothing around and no other way to arrive. To preserve this experience, we practice "Leave No Trace" and runway hazard mitigation; and advocate responsible use of these airstrips. Weve met land-based users at these airstrips; most of them are surprised to see an airplane on the ground and didnt realize the airstrip was there. Recreational aviation in the back country is low impact.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15888-4	Ben UT		Along those same lines, intensive OHV use and shooting should also be minimized, if not banned. People have unfortunately proven themselves unable to restrain themselves from running vehicles in places they shouldn't, both upsetting the wilderness and becoming a safety hazard in remote areas.	TRAVEL01-General	Under the Proposed Plan, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. Proclamation 9558 (incorporated by reference into Proclamation 10285) limits designation of new routes within BENM to those needed public safety or protection of BENM objects. The Proposed Plan does not have any areas designated as OHV open. See the Water Resources, Vegetation, Soil Resources, and Cultural Resources sections in Chapter 3 for a discussion of impacts on the resources provided in the comment from OHV use.
17409-3	Sophie Huss		Agencies should commit to working with Tribes on a route-by-route assessment for future changes in the travel system, emphasizing conservation and cultural resource protection. A Cultural Resources Management Plan Should adopt Tribal definitions of Monument objects and resources, to include not just archaeological sites, but also culturally important plants, riparian areas, culturally important wildlife, and intangibles such as viewsheds (i.e., night skies), soundscapes, and more.	TRAVEL01-General	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
17573-115	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Table 2-20. Alternatives for Travel Management On pages 2-116 and 2-117, FFSL is concerned with Alternatives B, C, D, and E which prohibit cross-country OHV travel in BEHM. FFSL is also concerned with Alternatives B, C, D, and E consideration of motorized aircraft to be managed as OHVs for BLM lands. FFSL deems that it is in the best interest of human health and safety to consider allowing motorized aircraft to protect public safety, especially from the threat of wildland fires.	TRAVEL01-General	OHVs are defined in 43 CFR 8340.0-5 and include aircraft when used immediately on or above BLM lands and waters, unless in an excepted category (i.e., emergency or authorized use). Aircraft use by partner agencies would be allowed under authorized administrative use. Refer to the Proposed Plan regarding authorizations available on a case-by-case basis.
17573-33	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Additionally, the draft plan states that [d]eviations from current routes maintenance levels would be addressed on a case-by-case basis.[1] This is a gross mischaracterization of who conducts maintenance of a large portion of roads in BENM and how that maintenance is performed. San Juan County, funded in part by the State of Utah Department of Transportation Class B Road funds, conducts road maintenance in BENM. To require consideration [unilaterally by BLM] on a case-by-case basis of deviations from current maintenance levels creates a standard that currently doesnt exist and is improper. Further current maintenance levels is ambiguous current as of when? This language will create uncertainty as to how and when the owner and maintainer of roads in the monument can perform its maintenance duties. The definition also does not address the issue of situations in which emergency repairs or maintenance are required to protect public safety.	TRAVEL01-General	The Proposed Plan states designated routes could be maintained to meet public health and safety needs and/or to protect BENM objects. Maintenance will always be evaluated on a case-by-case basis. Additionally, deviations from current route maintenance levels would be considered on a case-by-case basis. Maintenance, improvement, and monitoring of roads and trails would be planned and coordinated with local governments, partners and volunteers (Management Actions Common to All Action Alternatives section in the Travel and Transportation Management section of the Proposed Plan).
17573-34	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The definition of improvements is also problematic. As written, an improvement includes replacing existing infrastructure that is not in the kind already existing. This definition will allow special interest groups to more easily challenge required maintenance operations that seek to replace aging infrastructure with modern, more resilient infrastructure. Such language in the RMP now creates the expectation that the Agencies will analyze routine, basic road work that traditionally has occurred as maintenance. This will be a hook for special interest groups to use to push for new NEPA analyses which will increase costs and delays. For example, a project as simple as replacing a pipe culvert with a box culvert appears to be not allowed without BLM approval and analysis	TRAVEL01-General	The Proposed Plan clarified improvements would be considered on a case-by-case basis. See the Management Actions by Alternative section in the Travel and Transportation section of Chapter 2 for the definition of improvements for the purpose of this management action.
17573-35	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State encourages the Agencies to do travel management appropriately through implementation level planning (i.e. Travel Management Planning). The proposed zoning within this RMP/EIS is deficient for several fatal reasons. It is apparent that most of the OHV zone closures were based on no further analysis or consideration other than to mark and color the polygons on a generic map. This	TRAVEL01-General	43 CFR 8342.2(b) requires the BLM to designate all public lands as either open, closed, or limited to OHVs during the land use planning process (also see MS-1626, Section 3.1, area designations). Additionally, 43 CFR 8342.1 requires the BLM to minimize user conflicts and resource impacts resulting from OHV use when making such area designations. The area designations in the Proposed Plan are

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			is not how travel management is intended to be done. There were no route evaluations, no analysis of impacts of the routes within these closed areas to determine what impacts, if any, that these routes have on monument objects, their potential status and necessary consideration under Section 106 as historic properties, their use or necessity for accessing grazing allotments or SITLA lands, their level of use, the level of conflicts with other users, their necessity for search and rescue operations, or any other consideration or analysis that would typically go into the travel management process.		consistent with those legal requirements. They are also consistent with the protection of BENM objects as discussed in the Travel and Transportation section of Chapter 3, and as described in Proclamation 9558 (incorporated by reference into Proclamation 10285). 32 miles of routes are within the OHV closed area under the Proposed Plan. Designation of areas as open, limited, or closed would not likely affect the eligibility of routes as historic properties under NHPA. Authorized administrative use or routes would not be affected, as discussed in the Travel and Transportation section of Chapter 3. The effects of those area designations are addressed in several sections of the EIS including, but not limited to the Paleontological Resources and Geology, Water Resources, Terrestrial Habitat, Lands with Wilderness Characteristics, Wildlife and Fisheries, Recreation and Travel and Transportation Management sections in Chapter 3. Under the Proposed Plan, vehicle use would be permitted for emergency and administrative purposes, consistent with the protection of BENM objects (see Chapter 2, Travel and Transportation Management Actions Common to All Action Alternatives). As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
17573-36	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	Rather than evaluate the routes and areas appropriately, the Agencies acknowledged in a recorded public meeting on May 9, 2024, that the agencies dont even know what roads or trails are included in the OHV closed areas. This response to public concern is alarming. Agencies are proposing the closure of enormous swaths of land for the sake of preserving and protecting monumental objects without knowing what roads or trails they are closing or how the routes impact monument objects, if at all. It certainly raises the question, do the Agencies even know what monument objects are in those areas that need protection? Also, will the OHV closures even protect and preserve those objects, or will they further degrade and destroy those objects? The many deficiencies make clear that the object designations and road closures are arbitrary and capricious.	TRAVEL01-General	The public was provided with both a static map showing each currently designated route and its status within an OHV Limited or OHV Closed area (Appendix A) and an interactive map allowing for the same information to be viewed in detail. The designations in the Proposed Plan are appropriate to protect BENM objects as discussed in the Travel and Transportation section of Chapter 3, and as described in Proclamation 9558 (incorporated by reference into Proclamation 10285). As described throughout Chapter 3, OHV use impacts many resources in both the natural and built environment, and OHV closures would reduce and avoid those impacts.
17573-37	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	While many of the OHV closed zones appear to be arbitrary polygons on a map, it is evident in some instances that the agencies have either willfully ignored prior agency decisions, including administrative decisions, Title 5 ROWs, etc., or they have negligently failed their due diligence in this regard. There are routes within the OHV closed zones that the agencies cannot legally close in the proposed way. These routes are further evidence that this RMP/EIS is not based on science but on the whims and wishes of the preparers. Before adopting any OHV Closed zones in this plan, the State fully expects the agencies to conduct route evaluations to determine whether the routes within the OHV closed zones are negatively impacting the monument objects and whether or not a Title 5 or other right of way exists on said routes. The State looks forward to working with the Agencies on that project this summer. Failure to do so will result in an unnecessary delay in the implementation of this plan.	TRAVEL01-General	The OHV designations in the Proposed Plan would not impact Title V ROW holders because any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved, such as vehicle use authorized by Title V ROWs, is not considered an OHV under the regulations at 43 CFR Part 8340. OHV area designations are also consistent with the protection of BENM objects as discussed in the Travel and Transportation section of Chapter 3, and as described in Proclamation 9558 (incorporated by reference into Proclamation 10285). As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
17601-1	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	REASONABLE ACCESS TO STATE TRUST LANDS MUST BE PROVIDED Reasonable access to state trust lands is critical for TLA to fulfill our statutory and constitutional mandate to generate revenues for our trust beneficiaries. Since Congress intended to provide these lands to the state so that the state could use them to raise revenue, the access rights of the state across federal lands cannot be so restricted as to destroy the lands economic value. In State of Utah v. Andrus, 486 F. Supp. 995 (D. Utah 1979), it was held that although the United States may regulate the method and route of access to state school trust lands, the regulation cannot prevent the state or its lessee from gaining access to its land, nor may it be so prohibitively restrictive as to render the land incapable of full economic development. TLA objects to any decision that incorporates wholesale OHV closed zones at the RMP/EIS planning stage. Under the various alternatives, access to several parcels of state trust lands would be eliminated within OHV closed zones. Area closures at this phase are done without proper analysis of the effect that such a management action would have on trust lands or other state and county interests. There have been no route evaluations, no analysis to determine what effect, if any, these routes may have on monument objects, their level of use, their purpose and need, their level of conflicts with other users, their necessity for search and rescue operations, or their necessity for providing access to state trust lands. No OHV closed zones should be adopted without thorough, route specific analysis and an accompanying comment period for the cooperating agencies and the public to be provided with accurate information, analysis, and detailed maps to aid in educated commenting on proposed travel management alternatives.	TRAVEL01-General	Under the Proposed Plan, ROWs or SUPs may be granted/authorized to provide reasonable access to non-federal inholdings consistent with the protection of BENM objects. See the environmental consequences section in the Environmental Justice and Social and Economic Values section in Chapter 3 for discussion of impacts to TLA parcels from OHV area designation. See the Proposed Plan under the Travel and Transportation Section in Chapter 2, and see the same section for OHV management related to emergency uses.
17601-4	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	TOPOGRAPHICAL CONSTRAINTS MUST BE CONSIDERED Often, situations arise where access to one portion of a TLA property is insufficient to provide full access due to topographic or other constraints. For example, one road entering a TLA property may provide access to a mesa top. In contrast, another may provide access to a canyon bottom or one road may provide access to one side of a watercourse while another may provide access to the other. When one of these access points is eliminated, TLA loses the ability to derive the full economic benefit of those lands. Also, keeping all access points where topography or other challenging conditions exist is less detrimental to the environment or the area's objects and features than replacing an existing access point when one has been unnecessarily eliminated.	TRAVEL01-General	Under the Proposed Plan, ROWs or SUPs may be granted/authorized to provide reasonable access to non-federal inholdings consistent with the protection of BENM objects. See the environmental consequences section in the Environmental Justice and Social and Economic Values section in Chapter 3 for discussion of impacts to TLA parcels from OHV area designation. See the Proposed Plan under the Travel and Transportation Section in Chapter 2.

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17601-5	Chris Fausett 102 S 200 E #600 Salt Lake City, UT 84111	Utah School and Institutional Trust Lands Administration	EXISTING ACCESS TO TRUST LANDS MUST BE RETAINED Section 2.4.19.2 of the RMP/EIS states as per State of Utah v. Andrus, October 1, 1979 (Cotter Decision), the BLM would grant the State of Utah reasonable access to state lands for economic purposes on a case-by-case basis. TLA appreciates the recognition of this legal requirement in the RMP/EIS. However, existing public access to all trust lands should be retained under the RMP/EIS for the reasons previously discussed herein. Parcels of trust lands with existing public access that would be eliminated under one or more plan alternative include, but are not necessarily limited to, the following lands. Maintaining public access to these lands is critical so that TLA may fulfil the congressional intent of the trust lands grant and utilize the lands for their full economic development potential. Motorized public access must continue through Arch Canyon to provide access to the TLA property located in T37S, R20E, Sec. 16. Motorized public access must continue to the TLA property located in T39S, R15E, Sec. 32. Motorized public access must continue from Gulch Creek Road to provide access to the E2 of T28S, R16E, Sec. 16. Motorized public access must continue on Red House Cliff Road to provide access to the NW4 of the TLA property in T28S, R16E, Sec. 2. Motorized public access must continue in the Short Canyon area to provide access to the TLA property in T35S, R15E, Sec. 2 and T34S, R15E, Sec. 36. Motorized public access must continue in the Moqui Canyon area to provide access to the TLA property in T38S, R13E, Sec. 16; T37S, R14E, Sec. 32 & 36; and T38S, R14E, Sec. 2. Motorized public access must continue on Red House Cliff Road to provide access to the SW4 of T37S, R17E, Sec. 32. Motorized public access must continue to provide access to the NW4 of T37S, R18E, Sec. 16 due to topographic constraints caused by Armstrong Canyon. Motorized public access on the route from Beef Basin Road must continue to provide access to the E2E2 of T32S, R18E, Sec. 36 due to topographical constraints caused by Calf Canyon. Motorized public access on the route from Bobbys Hole must continue to provide access to T31S, R18E, Sec. 32 due to topographical constraints caused by Cross Canyon, Bull Valley, and Imperial Valley Washes. Motorized public access must continue to provide access to T32S, R18E, Sec. 16 from Ruin Park Hole and Gypsum Canyon. Motorized public access must continue between Lavender and Davis Canyon to the TLA property in T31S, R20E, Sec. 36. Motorized public access must continue from the small spur road from the Snow Flats Road to the TLA property in T39S, R19E, Sec. 2. Motorized public access must continue on the small spur route from Hart Point Road to the SE4 of Sec. 32, T31S, R22E. Motorized public access must continue to the TLA property located in T38S, R20E, Sec. 32. Motorized public access must continue on the small spur route leaving the SW4 of T28S, R20E, Sec. 32 to provide access to T29S, R20E, Sec. 2.	TRAVEL01-General	See the Proposed Plan under the Travel and Transportation Section in Chapter 2 for OHV management. See the environmental consequences section in the Environmental Justice and Social and Economic Values section in Chapter 3 for discussion of impacts to TLA parcels from OHV area designation. While some routes may be closed due to area allocations, decisions on route designations would occur in implementation level planning. Consistent with the Lands and Realty section in Chapter 2, the BLM would evaluate any request for reasonable access to TLA parcels on a case-by-case basis. Language was clarified in the Proposed Plan. See changes in the Lands and Realty section.
17617-22	Joe Neuhoﬀ PO Box 338 Bluff, 84512	Bears Ears Partnership	We recommend that the BEC be empowered to make decisions with the agencies on a route-by-route basis when it comes to existing routes and potential closures during Travel Management Planning.	TRAVEL01-General	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
1789-1	Ian Joslyn 9170 W 64th Ave Arvada, CO 80004		Arch Canyon in Bears Ears National Monument should remain open to vehicles to preserve its accessibility for a diverse range of visitors, including those who are unable to hike long distances due to age, disability, or other limitations. Vehicle access enables more people to experience the canyon's unique natural beauty, archaeological sites, and cultural signiﬁcance.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1789-2	Ian Joslyn 9170 W 64th Ave Arvada, CO 80004		The major of people I see on this trail [Arch Canyon] are not hiking as it would take days to do it. If protection is needed I would propose a permit system.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1792-4	Ann Wain		Closing Arch Canyon to off-road vehicles to preserve water quality and protect cultural sites.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1797-1			f Bears Ears is truly to be a multi-use monument, then Arch Canyon is a good canyon to allow motorized use. It ﬂashes every spring, resetting the canyon bottom. There are no ruins or lithics piles that could be disturbed by motor vehicle use.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1825-1	Charlie Groves		These strips have been active for 40+ years. Why change a good thing. Aircraft access is quick and the noise is brief. I come from Canada to visit the amazing off the beaten track airstrips in the USA every year, please don't ruin the best aviation on the planet.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classiﬁed as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1826-3	George and Frances Alderson 112 Hilton Ave. Catonsville, MD 21228		Motorized vehicle routes: The final plan should limit ORVs as suggested in Alternative E, restricting them to routes where they will not damage wildlife habitat or wilderness values. We call BLMs attention to the following areas where ORVs should be banned: Arch Canyon - We witnessed ORVs	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			driving in Arch Canyon when we hiked there. They left a carpet of dust on the ground and on vegetation, and they left a sheen of engine oil on Arch Creek. Vehicles repeatedly cross Arch Creek, but we saw no armoring to prevent erosion. Every vehicle stirred up a new batch of sediment that would flow down the creek. We have seen videos in which ORVS travel in the actual streambed, not just crossing it. That should never have been allowed. Lavender and Davis Canyons - Here the ORVs have done similar damage. Those canyons should be closed to vehicles, so the vegetation can rebound. Comb Ridge - This should also should be kept strictly closed to ORVs. It is an area that welomes visitors on foot, walking from the Butler Wash road up to the edge of the cliffs, or looking into the small canyons that shelter ultural sites. We enjoyed our hike one morning while we were staying at Bluff. We ate our picnic lunch high on Comb Ridge with a view of the great landsape for miles around. In our visit we noticed that Comb Ridge is vulnerable to erosion from any travel at all, because where soil exists at all, it is not deep. Hikers prefer to walk on bare rock to avoid damaging the soil. Any ORVs would stir up the soil and expose it to rapid erosion from the next rainstorm. Vehicles would also destroy the sparse vegetative cover, which is important as wildlife habitat. In our May visit we saw many migrating birds using those brushy areas on Comb Ridge as resting and feeding habitat.		in the future. Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. However, Lavender and Davis Canyon Roads are within OHV limited areas, which responds to the NPS need for access to permitted recreational opportunities provided on NPS lands. Under the Proposed Plan, Comb Ridge is within and OHV closed area from SR 95 to US 163, but the Butler Wash Road, Comb Wash Road, and camping and trailhead spurs are within OHV limited areas to allow for access to those opportunities.
18440-2	Lynne Shumway 778 N 300 W Blanding, UT 84511	San Juan ATV Safari /The Blanding Visitor Center	petition you to keep Arch Canyon open so that you and your families can be inspired by experiencing the healing spiritual gift this canyon gives. It can help to bring peace we all so need so much in our lives!	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18657-55	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	While certain anti-motorized interest groups love to claim that motorized recreation in Bears Ears is causing all manner of calamities, that could not be farther from the truth. In reality, the motorized route network in Bears Ears is currently well managed and is not causing any significant impacts to monument objects and values. There is simply no demonstrable need for a significant reduction in motorized routes as proposed in some action alternatives. The current motorized route network in Bears Ears is not haphazard or the result of a historical accident, but is the product of considered and deliberate travel management planning conducted in 2008 for BLM lands, and through MVUMs that are the product of many years of management actions in the Manti La Sal National Forest. The 2008 Monticello Field Office RMP already closed 316 miles of existing motorized routes in the area, with the remaining routes providing the bare minimum access necessary for basic connectivity and transportation needs in the area. Road densities throughout the monument are already sparse, as evidenced by the fact that so much of the monument is listed as possessing wilderness characteristics. Opportunities for solitude are already abundant even in roaded areas and there is simply no need for mass road closures to create such opportunities.	TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. OHV area designations are also consistent with the protection of BENM objects as discussed in the Travel and Transportation section of Chapter 3, and as described in Proclamation 9558 (incorporated by reference into Proclamation 10285).
18657-72	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	There are many other common medical conditions I have not experienced, but happen everyday. Expedited medical care, even if it is just a scoop and run, generally increases the chances of recovery. Other emergencies such as threats by fire or flood also are enhanced with motorized OHV in expediting evacuation. Often the shortest, or the route you came in on, are not the best routes for evacuation. Having a multitude of route choices is often the very best way to expedite evacuation and recovery. I have had a variety of emergency experiences in my life, but it pales in comparison to the number of actual issues that arise in daily life. Closing routes WILL increase evacuation, treatment delays, and even survivability. Human life and safety should be considered carefully in your decisions. For every route you propose to close, you should evaluate how these factors will be affected in the surrounding area.	TRAVEL01-General	Vehicle use is permitted for emergency purposes. The definition of OHV in 43 CFR 8340.0-5 excludes vehicles used for emergency or authorized administrative purposes.
18982-5	Daniel Kent 399 E 100N Moab, 84532	Friend of the Abajos	Banning side by sides would be the best thing. Removing trails that had recovered but then were reopened by local ATVers in recent years would be a great first step, including the wilderness trail, the trail below the north rim of north long point, the arch canyon trails, and the trail on the north rim of upper cottonwood canyon. the biggest impact from recreation will most likely be the ORVs, and it should be a top priority of the management plan to reduce ATV trail incursions into de facto roadless areas. I submitted a travel plan, fully documented and researched, in 1999. I believe that plan is still valid and would encourage your review and incorporation of it. I have been involved in road and trail assessments for over 40 years, including this area for SUWA in the 80s, and see illegal off-roading to be the number one threat to wilderness and wildlife and watershed, assuming we successfully phase out cattle in the monument.	TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. See Appendix H, Travel Management Plan Criteria. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
1965-1	Nancy Jarvis		Please close Arch Canyon to motorized use. The riparian areas have sustained devastating impacts from jeep safari and ATV impacts.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1979-2	Harvey Halpern		I support Alternative Es closure of Arch Canyon to motorized use.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
2013-1	Robert Riemer		We entirely support Alternative Es closure of Arch Canyon to motorized use, which is extremely destructive to the area.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
2463-1	GEORGE RICE P O Box 1225 Monticello, 84535		To get to the point, I would urge the planning team to find some middle ground. Please leave ample areas for recreation, both motorized and hiking /biking trails. An excellent example of trail system can be found just over the border in Colorado at the Canyons of the Ancients NM. Great trails with markers and signs. I think that would be a great model for many of the canyons in the Bears Ears area. On the topic of motorized recreation: I know this group of people get a bad rap. Sometimes they may deserve that. The reason I would like to see some motorized trails left open is because I am getting older. I still enjoy a good hike, but I cant do the miles that I used to be able to do. With an OHV, I can usually get a little closer and then hike in.	TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
5248-1	Andrew		Flying into a back country strip is the most eco sensitive form of transportation other than a bicycle. Do not close any of the strips!	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
5740-5	Roger Jenkins 588 Evening Star Ln, Bozeman, MT 59715 BOZEMAN, 59715		Arch Canyon: My personal experience backpacking in that canyon is that there are a lot of other places to take ones OHV. So I too would welcome closure of Arch canyon to motorized vehicles. Motorized vehicles do disturb the sense of primitiveness in arch Canyon.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
619-1	Kimberlee Allen 1890 W 80 S, Unit D3 Lehi, UT 84043		I would be sad to limit access to the public. We drive a UTV and we are not able to bike or hike. We are retired and have back and knee problems. I feel that I have just as much right to experience the public lands as much as anyone else, the BLM should be encouraged to keep it available to all. It would be sad to not have the public lands available for our future generations. Since the Bears Ears National Park was created it seem that more people migrate and use it more than before. I am a retired working person that feels like I should be able to enjoy my retirement years should include access for me.	TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
678-1	RICHARD GEORGE N8584 GARFELD ROAD, HOLMEN, WISCONSIN 54636 Holmen, WI 54636		Please continue to provide access to the Bluff Airport and Fry Canyon airstrip (Utah) along with 16 other airstrips by private non-commercial, fixed wing airplanes for recreational use. These airstrips provide access with the smallest and least footprint of any other access. There are no roads, trails or erosion since airstrips are on flat areas. Aircraft noise is only in and out. of very short duration. These airstrips have been allowing access for up to 70 years. They also provide emergency access for rescue, fire, and other BLM needs. These airstrips also provide access to those with limited mobility. All of these strips are an important for allowing access for everone. Please consider keeping all of these airstrips open to all.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
685-1	Jason Hart		As a pilot and volunteer emergency services pilot, I can attest that closing access to the 16 backcountry airstrips for public use increases the dangers and response times for delivering aid in times of emergency. The RAF volunteers have maintained airstrips all over Utah and Nevada at no cost to the public, yet the public emergencies services have been able to utilize these strips. The RAF volunteers have documented the various hazards of the strips and this has provided invaluable information when planning missions. I humbly request that BLM continue to allow the RAF and its volunteers access to the rural and backcountry airstrips, their use of the airstrips provides an overlooked service to the broader public at large in times of need.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
688-1	Cory Codner		Hike only country will not be helpful for Indigenous people many of them are elderly can not hike 5 to 10 miles which is why more OHV trails are needed so everybody can enjoy and access the bears ears.	TRAVEL01-General	Proclamation 9558, incorporated by reference into Proclamation 10285, states that designation of new routes must be limited to roads and trails necessary for public safety or protection of BENM objects.
690-1	Michael Mayra		Back country aircraft users are typically very courteous and take great care of the airstrips which also helps maintain safety for rescue if the need arises. Please do not restrict access to these historical airstrips within BENM.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

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					on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
692-1	Brian Rudolph		As a pilot currently building a backcountry plane, I have been dreaming of flying to the beautiful Bears Ears NM. Please dont arbitrarily close the backcountry airstrips in the BENM. These airstrips have been used for decades and allow unique recreational opportunities. The users have a small environmental and noise impact compared to many other uses and require minimal infrastructure. Theses airstrips are also used as trailheads by aviators and their passengers. This is a group of users that practice LNT ethics.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
698-1	Boyd Colton 1431 W 1200 N Mapleton, UT 84994		In reference to public access, more specifically motorized access for the Bears Ears area. The road into Arch canyon should be left open to motorized traffic. Those that have mufflers that don't offend others are usually jeeps, 4x4 small trucks. I would suggest that the side by side groups with loud mufflers and the tendency to speed not be allowed access. The side by side groups go around corners and create berms from throwing the sand. Please consider the option of leaving the canyon open it has some of the best red rock scenery and arches available to see. I think it should stay open for following generations of responsible motorized traffic since it is so beautiful and a cherished place.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning, agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
715-1	Matt Rogers		I am against closing any airports in the Bears Ears National Monument. Airfields are useful to everyone, as they serve as places for search and rescue and Medevac flights should the need for either arise.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
728-1	Kurt Van Hulzen		Please keep all 18 airports in the BENM open to general aviation aircraft. These airports provide unique, low environmental impact recreational opportunities (camping, hiking, etc) and unique access not found in many of our National Parks or National Monuments.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
736-1	mark clawson		It should be mentioned that the preservation of these airstrips provides a level of safety and utility in an area that is extremely remote. Fire fighting, rescue services and even ambulance services are facilitated by maintaining the presence of extremly low-impact airstrips in these backcountry areas. There has been a long history of cooperation between BLM, state officials and the backcountry pilots who use and maintain these airstrips. I sincerely hope you will take this into consideration, recognize the airstrips as a part of history and a logical component of the safe, responsible use and ongoing enjoyment of an area that is breathtaking and wonderful.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
740-1	Mark Urness 1045 N Morehouse Ave Eagle, ID 83616		Without the existing network of strips, some much would be lost forever. Safety would be impacted, roads would be more necessary, camping sites more crowded. As it stands, these "off road" locations are accessed with "No Trace" and the only impact would be the momentary, limited noise footprint which all of us are conscious of. Please maintain the current network of airfield in BENM. We are losing too many wonderful outdoor opportunities in our country. Maintaining diverse ways to access to these protected special places is imperative. They have been built and created by those that came before us so that future generations may enjoy them. It is my belief that we should also maintain and pass them on to the next generation to enjoy, not just read about as something that once existed.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
7416-2	Melissa Rigg PO Box 415 Bluff, UT 84512		My primary concern is enforcement of whatever Alternative is selected. I regularly explore new-to-me areas in Bears Ears National Monument and steward several archaeological sites within the monument for the UT State Historic Preservation Office. I am always dismayed when other visitors don't obey the existing rules: They drive over a barricade where there's a posted Road Closed sign or they take their dog into Grand Gulch despite being verbally told that's not allowed. Signage will be critical as will visitor education.	TRAVEL01-General	Under the Proposed Plan, travel routes would be well marked (see the Management Actions Common to all Action Alternatives section in the Travel and Transportation Management section in Chapter 2), which would inform OHV operators about which areas are open for travel. Route closure and enforcement mechanisms will be specified in a future implementation-level travel management plan.

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746-2	Todd Parker 1877 Carriage Ln Kaysville, UT 84037		Please keep access to these unique landscapes available to us to enjoy up close, by being able to land on these airstrips, and for those like my wife who would otherwise not be able to enjoy them at all.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
753-1	Daniel Kranz		Please do not close backcountry airstrips in the Bears Ears NM. The airstrips provide backcountry access without roads and other infrastructure and have been in use for many years without problems.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
755-1	Dan Lynn		Please protect backcountry aviation! This expansion could force the closure of dozens of backcountry airstrips that are presently used responsibly by backcountry pilots to access camping, fishing, hiking and other permitted uses of the land. Please include aviation as a permitted use, with appropriate safeguards.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
757-1	Andy Michie 1004 W 500 N Salt Lake City, 84116		Its my understanding that aircraft are classified as OHVs, which is misleading. In general, Im not a supporter of OHV access to protected wild areas because like most people, I value a quiet and natural experience in the outdoors. I appreciate the views, hiking, camping, and preservation of delicate ecosystems. I believe that aircraft are their own category of vehicle when it comes to operating them in these protected spaces, because unlike other OHVs, they dont create constant noise or disrupt the landscape in the course of their operation. They simply serve to provide access to these areas to designated spots (much like driving a car to a trailhead, for example) and then they are shut down and parked while the pilots and passengers enjoy the natural landscape responsibly in the way its intended to be experienced. The noise they create is temporary in nature, during takeoff and landing only, and the impact they have on the landscape is limited to airstrips.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.OHVs are defined in 43 CFR 8340 and include motorized aircraft when not in one of the excepted categories (i.e., emergency use, authorized use).
757-2	Andy Michie 1004 W 500 N Salt Lake City, 84116		However, these airstrips are essentially gateways to these amazing areas, and by shutting down those gateways, responsible access to these areas is also shut down. In addition to this, the backcountry aviation community in general sets itself apart from the general public in the way that advocacy and education about responsible operation is in the DNA of every pilot. Basically, in order to even be able to fly a plane into the backcountry you need to have demonstrated a certain level of care, responsibility, decision making, and understanding. Trust me, these are the people you can trust to take care of this amazing resource. An example of this is the fact the backcountry pilots routinely put out emails about taking care of these places, plan work weekends to clean and maintain the strips, respond to public concerns by having meetings and addressing them in newsletters. Please reconsider this part of the draft RMP and retain access to all current backcountry strips in Bears Ears.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
766-1	Ben Gleckler		Aircraft noise is limited in these areas and is short in duration. There is very little impact to others experience in the Bears Ears by aircraft. I would like the BLM to look into how many noise complaints have been filed about aircraft noise in these areas.	TRAVEL01-General	While these noise-generating uses may be short-term in nature, they would affect soundscapes within BENM and are analyzed under the Proposed Plan in Section the Natural Soundscapes environmental consequences section in Chapter 3.
771-1	Charis Grosdidier		Please do not close these airstrips! They are a great way for the public to access the lands and are kept up by the pilots who use them	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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780-1	Jonathan Zarinnia		Please preserve the airports. Preserving these airports also preserves back country logistics, search, rescue and response capabilities.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
781-1	Sean Strasburg 308 W Broadway, STE 201 Salt Lake City, UT 84101		Would like to say the aircraft impact on Utah's backcountry strips from aircraft is negligible while still keeping access to our public lands. Aircraft leave no trace outside the landing area. The impact time is very short not needing a long road to get access. It is impossible to "go off trail" like the numerous side by sides that are trashing our backcountry. Please keep this available for us to access the land we all pay for and appreciate.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
783-1	Justin Mackie 1300 W Calf Springs Rd Enterprise, UT 84725		As part of the proposed Bears Ear NM Resource Management Plan, 16 historic and long since established backcountry aviation airstrips are up for possible closure. I am writting to comment specifically regarding the importance of continued access to these 16 historical aviation landing sites within the bounds of this BENM, RMP. These 16 backountry airstrips listed below would under the current plan as written be closed entirely to the public and all potential users, rendering them forever lost. Aviation has a very small enviromental footprint, the lightest enviromental footprint in fact of any mechanised travel. These airstrips are not places of commercial use, but solely general aviation non-commercial use sites of importance to pilots. I am a Utah landowner, rancher, aviator and manager of an FAA sanctioned backcountry airstrip in Southern Utah. Please deeply consider saving these irreplaceable resources within your BENM RMP. They are vital to future generation's preservation of access with very limited footprint in our federal lands. LIST OF AIRSTRIPS WITHIN THE PLAN THAT SHOULD BE SAVED FOR USE. Browns Rim Fry Canyon South Sipapu Bridge Deer Flat Dry Fork Canyon Hammond-Kigalia Point Bluff Mule Canyon Red House Spring Dark Canyon North Dark Canyon South Fry Canyon Long Canyon Clay Hills Crossing Lockhart Basin Lockhart Road Polly Mesa Valley of the Gods Justin Mackie Mackie Ranch Enterprise, Utah Mackie Ranch Airfield	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
784-1	Chris B		Please do not remove access to the airstrips in this area. They have been proven to be of very low impact, are utilized by those who are good custodians of our public lands, and have numerous practical benefits	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
823-1			These airfields represent an essential part of the established aviation culture and industry, not only in Utah but throughout the nation. Limiting access to only these two strips would seriously harm a community that already supports and greatly values the land in that area.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
837-1	Ty Sickels		I see nothing in this proposal that improves the access and utilization of public lands. Everything proposed is increased restriction. Closure is not management. The BLM continues to take our rights and freedoms at any and all opportunity to do so. I am against this restrictive regime and any and all actions that they take to strip the rights from the public.	TRAVEL01-General	The agencies considered a range of alternatives that included various levels of access. See alternatives B and C under the recreation and travel and transportation management sections in Chapter 2. The Proposed Plan includes ROW open areas along paved highways as well as expanded ROW avoidance areas when compared to Alternative E to allow access for Right-of-ways.
843-1	Garrett Morrison		I have flow all over Idaho, Oregon, Washington, and just venturing into Utah. Our aircraft are light and dont cause damage to the lands. Many of the strips I fly into I pick up any trash Ive ever seen left behind by others and I know most pilots will do the same. The amount of land that is required is very little compared to the roads it takes for other off road type of adventures. More and more airstrips are being shut down and its leaving general aviation into a spot that has no future. There are organizations within aviation that will work to maintain the lands. I have used my airplane to help other adventure seekers during an emergency. Please keep the beautiful back country airstrips of	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

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			Utah open for us aviation enthusiasts. I love to pitch my tent next to my aircraft and enjoy what Mother Nature has to offer.		on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
866-2	Wendy Lessig	Recreational Aviation Foundation	Thank you for including aviation in the Bears Ears NM (BENM) draft RMP. I offer the following comments on the history and usage of the 18 airstrips in the BENM. I request that the BLM allow private, non-commercial, fixed wing aircraft to continue recreational use of the 18 historic and existing airstrips in the same manner that has been in effect for the past 40-70 years. It is also requested that any decision to close, limit or to designate airstrips officially as open be deferred to the Travel Management Plan process, so that the merits of each airstrip can be properly evaluated, the same as the BLM is proposing for the existing OHV routes.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8712-1	Serrhel Adams		My goal is always to leave the area better than I found it, as I will pick up any refuse items that seem amiss. Thankfully, this is rare, as other pilots seem to use the lands with the same respect. The BLM airstrips allow my family and I to visit areas with historic meaning to aviators. As a pilot, I am able to enjoy these lands by using longstanding airstrips requiring minimum maintenance, without requiring the use of road maintenance. I fly like most pilots. I minimize my time over sensitive areas. I throttle back and adjust my prop setting to minimize any noise signature. My passing any area is very transient and has a minimimal sound profile in any one area. I think it speaks volume to the respect that my fellow pilots and I have for the areas as there have boon no noise complaints from users of BLM lands. ?I, like other pilots, have seen the other positive benefits of the BLM airstrips. Firefighters, EMS, and other rescue services utilize them. Additionally, they provide a plan b for any pilot transiting the area should an emergency occur requiring a precautionary landing. The airstrips allow pilots to share the property with their older family members, those with impairments, or anyone who would struggle with the long journey across land to enjoy these areas.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8728-1			Revoking the peoples right to use these airstrips is absurd. Apart from being a way for pilots all across the country to access this beautiful national park these strips can serve as access points for rescue operations if people ever find themselves lost! Another point is thats the vast majority of the park isnt affected by the existence of these few airstrips and so with all these reasons I stand with the decision to keep the airstrips!	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8732-2	Susan Markley PhD, FL		Travel management planning should include route by route assessment for future changes in the travel system, emphasizing conservation and cultural resource protection.	TRAVEL01-General	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. On BLM lands, all areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis.
878-1	John Karam		Having used many of the airstrips in the region over the years, I can attest to the fact that the strips provide valuable access to vast areas otherwise not easily accessible by other means. Stewardship of those areas is something the pilot community takes very seriously and the community often takes steps to volunteer to maintain and improve the areas in a low impact manner. The relationship fosters a win-win solution for management of public lands that does not depend on stretched public funding. It also allows the BLM to focus on other areas of importance. Moving on it would be a mistake to limit access to public lands in amanner that would increase the burden on the already strained BLM rescources.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-31	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	While anti-motorized groups like SUWA have long claimed the Arch Canyon road is negatively impacting natural and cultural resources (primarily riparian areas and water quality in Arch Creek), this is demonstrably false, as there is overwhelming evidence that it is not causing any significant adverse impacts. The Arch Canyon route has been analyzed by the BLM no less than five times since 2006, and multiple other times before that dating back to the 1970s, creating probably the most extensive administrative record for any motorized route in southern Utah. While the BLM did find some adverse effects in the 1970s, every time the BLM has analyzed the route since the early 1990s it has found no significant adverse effects and determined that its extreme importance for motorized recreation merits keeping it open to motorized use.	TRAVEL01-General	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning, agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
889-35	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The second reason given by BLM staff at the April 16 virtual meeting for closing the Arch Canyon road is alleged user conflicts because some unknown parties supposedly consider Arch Canyon a desirable location for multi-day backpacking and backpackers dont appreciate the presence of motor vehicles in the canyon. Not only is this rationale not found anywhere in the DEIS, it is facially absurd and discriminatory toward both motorized users and people with disabilities. As discussed in more detail below in the section on user comments, subjective preferences of a certain subset of public lands	TRAVEL01-General	See the Management Actions by Alternative section in the Travel and Transportation Management section in Chapter 2. The Proposed Plan does not have a closed area designation for OHV use in Arch Canyon. The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning, agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future. As described in Chapter 3, OHV use in Arch Canyon impacts

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			users are not environmental effects under NEPA and do not justify excluding other classes of users from an area. A recent Ninth Circuit Court decision correctly notes that controversy as a NEPA intensity factor refers to disputes over the size or effect of the action itself, not whether or how passionately people oppose it. Wild Wilderness v. Allen, 871 F.3d 719, 728 (9th Cir. 2017). The panel further indicated it need not address the question of whether on-snow user conflicts are outside the scope of the agency's required NEPA analysis entirely because they are citizens' subjective experiences, not the physical environment. Id. at 729 n.2 (citations omitted).		several resources, including, but not limited to, water resources, fish and wildlife habitat, cultural resources, and recreation.
889-80	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Even assuming that preventing annoyance to other monument visitors is a legitimate basis to ban drones, we note that for most of the specific locations where drones would be banned under the various alternatives, there is no clear connection to that goal. Most of these areas are unlikely to have significant numbers of people in them, and many others (especially near roads) allow other motorized devices which are far noisier and far more annoying than drones.	TRAVEL01-General	A range of alternatives for drone use in Bears Ears are analyzed in the RMP/EIS. There are other impacts of drone use beyond noise impacts on visitors to Bears Ears National Monument, see wildlife section for impacts from Unmanned Aerial Systems and recreation section in chapter 3 analysis of impacts from motorized vehicles.
889-85	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	As discussed above, so far the agencies have failed to describe any concrete harms the proposed drone restrictions in the action alternatives are intended to solve. Even if the agencies did have specific concerns with drone flying that needed to be addressed, we question why these specific prohibitions on drone flying must be included in the monument management plan as opposed to being promulgated by special order or included in project level management plans. A management plan is, after all, akin to the constitution of a national monument. It provides the overall governance framework for a monument much as the Federal Constitution provides the overall governance framework for the Federal government and state constitutions provide the governance frameworks for state governments. Just as detailed laws governing specific activities do not belong in the Constitution, detailed rules regulating specific activities do not belong in the monument management plan. The management plan should provide general guidance for project level management decisions, not dictate every minute detail. The restrictions on drone flying in the action alternatives are inconsistent with existing Forest Service and BLM guidance regarding drone flying, and will be difficult or impossible for the general public to either know about or follow. The average person visiting the Bears Ears National Monument who may wish to fly a drone will never have even heard of the monument management plan, let alone read it. Unless the agencies post and advertise the rules very clearly, most members of the public will not realize that launching and landing drones is prohibited in the monument.	TRAVEL01-General	Criteria for the use of drones was considered within the range of alternatives presented in the draft RMP/EIS (See the Alternatives for Lands and Realty Table in the Travel and Transportation section in Chapter 2). As noted in the draft RMP/EIS, the launching and landing of drones are managed as OHVs under BLM Handbook H-8342 and USDA Forest Service Handbook FSH5709.16. Impacts to soundscapes and trends in usage are discussed in the RMP/EIS. The Proposed Plan is consistent with applicable laws and regulations.
900-1			I support maintaining aviation access to existing airstrips within the national monument. Especially where airstrips have already been built, aircraft enable access and enjoyment with minimal to no impact on the terrain. They do not require roads and road maintenance, do not kick up dust, and do not drive off trail and cause erosion or other impacts that cars and trucks do. This is the lightest footprint method to access these areas. Pilots and airstrip users are good custodians of the land, as evidenced by the pristine condition of these airstrips over the years and the lack of trash, graffiti or other damage.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9044-1	Jacob Strong		In regards to the Bear Ears National Monument changes to OHV use I feel that classifying aircraft as OHV in the same way as other vehicles is not in the spirit of proposed changes. Aircraft have an extremely minimal footprint compared to other vehicles. An airstrip may be only a few thousand feet, while other OHVs require many many miles of roads and trails to give access to the same location.	TRAVEL01-General	OHVs are defined in 43 CFR 8340 and are provided in the document. OHV does not refer to a specific type of vehicle, such as an ATV or a side-by-side, but instead can refer to various types of motorized vehicles when on or immediately above public lands or waters and when not in excepted categories such as authorized or emergency use.
9102-1	Cameron		The reduction of access in Bears Ears and any BLM land is unacceptable. These are public lands should be accessible to all not just those that have elite physical fitness. I found they leave more trash cause more issues than most users. Aviation is a low impact access but access should be available to all.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9150-3	Paul King 2451 NW Broadway St Albany, OR 97321		Finally, not only is taking away our access to these airstrips discriminating against aviation and those who aviate for their recreation, the classification of airplanes as OHV is dangerous as it allows the BLM and other Government agencies to continue to discriminate against the aviation community.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
918-3	Craig Gustafson 357 W. Ridges Blvd. Grand Junction, CO 81507		airstrips are important to all users of the Bears Ears National Monument. Airstrips provide access to our public lands for firefighting, rescue, and other ambulatory services. These same airstrips provide transient pilots overflying Utah established, safe, maintained airstrips should a precautionary landing or emergency arise. Airstrips also serve as access points to our public lands to those who have challenges traveling via other means. For over 26 years, the Utah Backcountry Pilot's Association has managed a collaborative and cooperative working arrangement with our local BLM officials on the recognition of our states historic backcountry airstrips. We hope that through these efforts, these airstrips will not only be recognized, but included in the final iterations of these Resource Management Plans and future Travel Management Plans.	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
9255-12	Keith Alleman		States "Under Alternative D and E, approximately 66% and 58%, respectively, of the Planning Area is closed to OHV use." Alternative D is described earlier in the Executive Summary as having 982,914 acres as OHV closed, which is indeed 66% of the 1,490,000 acres of the Planning Area. But Alternative E's math doesn't work; it is described earlier (page ES-10) as having OHV closed area of 569,971 acres, which is 38% of the Planning Area. I'd guess the "58" is just a typo, but it is a substantial one.	TRAVEL01-General	Acreage and percentages were verified and errors in the document were corrected.
9372-21	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Page 41 implies a very prejudiced view when it states, Increases in visitation could bring increased OHV use and associated access to more and more remote archaeological sites. Additional visitation to these more remote locations could have associated impacts (e.g., vandalism, looting, and accidental damage) to these sites. Not only does this present a false narrative that increased OHV use would provide more access to remote archaeological sites, it also implies that only OHV users commit negative impacts on archaeological sites. The managed lands are all designated as closed to off-road travel. Therefore, OHVs cannot, legally, be used to access any other archaeology than they currently can. They cannot be used to access any further remote country than they currently do. Furthermore, the accusation that OHV use is the root of the associated impacts has been proven invalid by BLM studies. In the Reason of Decision from 2010 concerning Arch Canyon, this has been clarified when it states, Almost all of the adverse effects that were identified are a result of activities that took place years and even decades ago and such effects cannot be attributed to OHV use. It continues to clarify, The effects are minimal in the upper portions of Arch Canyon and are more pronounced toward the mouth of the canyon. (https://secure.suwa.org/site/DocServer/archCanyon_BLMDecision.pdf;jsessionid=00000000.ap20116a?docID=10801&NONCE_TOKEN=A1289805BB6DF6CEF1172B4AD746A8A2) The sites towards the mouth of the canyon are the most visited sites and have seen the most negative effects. The sites that are more accessible to hikers are visited more frequently and also have seen more adverse impacts.	TRAVEL01-General	The commenter is correct that the majority of impacts to archeological sites caused by recreational use are not caused directly by OHVs when on designated roads, but by those and other users when accessing sites on foot. However, because OHVs allow recreational users to cover substantially more ground in the same time frame as compared to recreational users traveling entirely on foot or even by horse, the potential for more visitors to access to remote archeological sites is generally increased in areas with more OHV routes as compared to those areas accessed entirely on foot. The statement is not a value judgment about user types, it is rather an observation regarding the ease of access provided by OHVs as opposed to walking across rugged, semi-arid environments, and the expected impacts to archeological resources under the assumption that all types of recreational users have the potential to impact archeological sites, regardless of whether those impacts are inadvertent or intentional.
9372-26	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Furthermore, under the second purpose of the proclamation, historical routes and trails are to be protected the same as the historic sites. Current routes and trails to access historic sites are often the same as those used when these important sites were being actively used. Limiting OHV access to these sites is counterintuitive and lacking in purposeful declaration.	TRAVEL01-General	Under the Proposed Plan, in OHV limited areas, the agencies, in collaboration with the BEC and Tribal Nations, may close or restrict OHV use where OHVs are causing considerable adverse impacts to BENM objects, including traditional uses and resources and areas important for traditional ceremonies. In OHV limited areas, OHV limitations, including seasonal closures, would be identified during travel management planning to allow for resource rest and/or traditional uses or ceremonies and to comply with 43 CFR 8342.1. See Appendix H: Travel Management Plan Criteria.
9372-30	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Beyond the spur roads and unlisted roads, some critical closures should have more reasoning and a more complete travel plan provided before closing them. Mikes Canyon (D0004) is marked as being closed but isnt mentioned one-time in the draft management plan. This is a critical road for the grazing permit holders of that area. There are ponds and water resources in Mikes Canyon that the cattle use frequently. Also, it is a critical desert bighorn sheep management area. Being able to access this road is important for the proper conservation and management of the bighorn sheep herd in that area.	TRAVEL01-General	See the Management Actions by Alternative section in the Travel and Transportation section of the Proposed Plan for OHV area designations. The Proposed Plan includes management action regarding granting of reasonable access and authorized administrative use of routes in the Management Actions Common to All sections in the Lands and Realty and Travel and Transportation Management sections in Chapter 2, which could apply to Mikes Canyon. Specific road designations (including open, limited, or closed) are implementation-level decisions that are not addressed at the planning level in the RMP/EIS. Implementation-level planning will be consistent with the management direction in the approved RMP and Presidential Proclamations 9558 and 10285.
9372-32	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Additionally, the closure of Lavender Mesa (D0492) has no practical reasoning. At least not, any provided. The closure of Heifer Mesa (D1289) from the north end, but allowing access from the south end lacks contemplation. The north end is a desert terrain with minimal impact and provides access to rock climbing corridors. The south end provides access through the riparian section of Hop Creek. To close half of it just creates spur roads and limits access for practical purposes.	TRAVEL01-General	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands. (See the Wilderness Study Areas, Visual Resources, Natural Soundscapes, and Travel, Transportation, and Access Management sections in Chapter 3 OHV area designations are consistent with the protection of BENM objects as discussed in the Travel and Transportation section of Chapter 3, and as described in Proclamation 9558 (incorporated by reference into Proclamation 10285). As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
982-1			The Monument and all it's natural splendor are much more easily accessed via these 16 airstrips proposed to be eliminated! The access or these areas of the Monument have been utilized for periods of 40 - 70 years, respectively, and are not damaging the Monument in any way! I say, "If it's not broken, don't 'FIX' it!!!!" These airstrips accessing the various Monument sites certainly are not a	TRAVEL01-General	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			problem! In fact, they give cleaner quicker access to many hiking trails, and allow camping activities to aviators who will help to keep the Monument in its pristine condition!		Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1484-2	Lisa Potter		As you adopt Alternative B in the final plan, please refine it so that it allows managed OHV use of the area and does MOT close additional trails in the ara. Closure is not management.	TRAVEL01-General, ALT02-Alternative B	Under the Proposed Plan, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. Proclamation 9558 (incorporated by reference into Proclamation 10285) limits designation of new routes within BENM to those needed public safety or protection of BENM objects. The Proposed Plan does not have any areas designated as OHV open. See the Water Resources, Vegetation, Soil Resources, and Cultural Resources sections in Chapter 3 for a discussion of impacts on the resources provided in the comment from OHV use.
9372-29	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	Under alternative D, there is a high quantity of closures. The closures seem to be mostly spur roads, but spur roads provide access to high-quality resources in a lot of cases. For example, D4190 on Baullies Mesa provides access to the Ruin on the Boulder and the towers above said ruin. All the aforementioned ruins are in places inaccessible to vehicle travel and have no interference by roads, so closing this spur road provides no benefit towards the purpose of the monument. Some trails arent noted on the map or in the document and are just being left out. Two for instance are the far reaches of D0244 on Baullies Mesa providing access to a State Trust Land and D5357 on Cedar Mesa which is part of Trail System 1 and connects the Owl Creek Road with the migrant trail.	TRAVEL01-General, ALT04-Alternative D	See the Management Actions by Alternative section in the Travel and Transportation Management section of the Proposed Plan for OHV area designations. Under the Proposed Plan, D4190 is within an OHV limited area. The impacts of closing the spur roads under Alternative D, specifically to campers are disclosed in the DEIS in the Chapter 3 Cultural Resources section. Under the Proposed Plan, agencies would develop an implementation-level travel and transportation management plan analyzing individual routes. See Appendix H, Travel Management Plan Criteria.
889-49	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	West of Bobbys Hole is a series of challenging 4x4 roads that form a remote and lightly used scenic loop through the Bull Valley and Imperial Valley areas, crossing into the Glen Canyon National Recreation Area and accessing three overlooks of side canyons of the Colorado River. All of these roads are in inventoried lands with wilderness characteristics and would be automatically closed by the OHV area designations in alternative D. We strongly oppose this action as it would completely deprive monument visitors of all practical access to the Imperial Valley area, which would now only be accessible by a lengthy multi-day backpacking trip.	TRAVEL01-General, ALT04-Alternative D	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS need to protect soundscapes and visual resources. However, some locations, including the routes leading to Elephant Hill, were designated as OHV limited in order to preserve NPS permitted opportunities. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands. Some routes within Beef Basin adjacent to NFS lands are within OHV closed areas in order to protect BENM objects.
18688-3	Ken Fitch		Transportation. Tribal input on transportation, especially vehicles of any kind, is important, especially as major impacts on the terrain and cultural resources are possible. We realize also that the remoteness and inaccessibility of some areas of the Monument offer protection for these fragile, yet significant sites.	TRAVEL01-General, ALT05-Alternative E	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
10343-1			An improved Alternative E for the Bears Ears Management Plan best aligns with the Proclamation establishing the Monument, and will ensure that this landscape is managed in collaboration with the five Tribes of the Bears Ears Commission for the long-term protection of, and respect for, its natural, spiritual, cultural, and historical values and resources. 1. close Arch Canyon to motorized use.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
11767-3	Steven Kloetzel		Agencies should work with the engaged Tribes on a route by route assessment for future changes in the Travel Management system, emphasizing natural resource conservation and cultural resource protection.	TRAVEL01-General, ALT05-Alternative E	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
1195-5	Lee Stanfield		You must follow through with the closure of Arch Canyon to off-road vehicles because it will better protect water quality in the canyons rare perennial stream, will safeguard the canyons abundant and irreplaceable cultural sites, and will promote quiet and contemplative visitation.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1293-6	Janet Kahan		Close Arch Canyon to off-road vehicles A motorized route in Arch Canyon currently crosses a rare perennial desert stream dozens of times, damaging an important water source and habitat for plants and animals. The whine of two-stroke motors echoes for miles beyond the canyon as vehicles spew oil and petrochemicals into the creek. Closing Arch Canyon to off-road vehicles will better protect water quality in the canyons rare desert stream, and better safeguard the canyons abundant and irreplaceable cultural sites while promoting quiet, contemplative, and respectful visitation.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1383-5	southern Utah resident		Close Arch Canyon to off-road vehicles A motorized route in Arch Canyon currently crosses a rare perennial desert stream dozens of times, damaging an important water source and habitat for plants and animals. The whine of two-stroke motors echoes for miles beyond the canyon as vehicles spew oil and petrochemicals into the creek. Closing Arch Canyon to off-road vehicles will better protect water quality in the canyons rare desert stream, and better safeguard the canyons abundant and irreplaceable cultural sites while promoting quiet, contemplative, and respectful visitation.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
15055-1	Robin Todd	Maryland Ornithological Society	(1) For the benefit of bird and wildlife habitat, keep off-highway vehicles (OHV) out of all riparian areas and all washes, especially those identified as habitat for endangered, threatened and other special-status species	TRAVEL01-General, ALT05-Alternative E	Route by route travel planning will be completed under an implementation level Travel Management Plan. Implementation-level travel planning would not designate new motorized and mechanized routes in riparian areas, wetlands, and water resources unless necessary to ensure the protection of BENM objects and in collaboration with the BEC. Implementation-level travel management planning would ensure motorized and mechanized routes that parallel or cross streams would be located to best complement

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					riparian and aquatic ecosystems as well as road/trail and stream geometry. This includes locating crossings (fords) at points of low bank slope and firm surfaces wherever practicable. Improvements to routes, including potential reroutes or alternative alignments, to provide for public health and safety needs and/or to protect BENM objects, would be considered during plan implementation on a case-by-case basis, in accordance with agency policy. See Appendix H: Travel Management Plan Criteria.
1538-3	Susan Ordway		Please follow through with the closure of Arch Canyon to off-road vehicles. Their current use in the area damages a perennial stream that is an important water source for plants and animals.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1573-1	Richard Feldman 119 Cherry Ln teaneck, 07666		I support Alternative Es closure of Arch Canyon to motorized use. In addition, Alternative E should expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1575-2	Steven Glow MT 59831		I support Alternative Es closure of Arch Canyon to motorized use. In addition, Alternative E should expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
17203-2	Richard Plummer		Having visited Arch canyon several times over the past 4 decades (always on foot), I can attest to the progressive degradation of the canyon bottom-land due to abusive motorized vehicle activity. Without the closure, the level of vehicular access and the concomitant resource damage can only be expected to increase. Arch Canyon will be given a chance to recover if this area is closed to motor vehicle access, which must be part of the final plan. In addition, Alternative E should expand closure areas to protect the other most-significant resources in the Monument, which are at risk from motorized vehicle damage.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
17421-4	William Croft 1801 Stanford Drive NE Albuquerque, NM 87106		Sensitive areas with important cultural and natural resources should be closed to motorized vehicles, in addition to Arch Canyon. These should include routes that reach national park boundaries and hence risk trespass and damage to the parks.	TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands. (See the Wilderness Study Areas, Visual Resources, Natural Soundscapes, and Travel, Transportation, and Access Management sections in Chapter 3)., The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions.
18238-49	Chaitna Sinha		Agencies would develop a travel and transportation implementation-level plan. Agencies would coordinate with local government and the BEC and other Tribal Nations on implementation-level travel planning. DEIS, p. 2-116 (Management Actions Common to All Action Alternatives). We propose: Within three years of issuance of the Record of Decision, the Agencies will develop a travel and transportation implementation-level plan in collaboration with the BEC. Agencies will also coordinate with local governments and other Tribal Nations on implementation-level travel planning. [See letter for emphasis]	TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan the agencies would develop an implementation-level travel and transportation management plan within 5 years. Agencies would coordinate with state and local governments and the BEC and other Tribal Nations on implementation-level travel planning.
18302-3	Joe Jones		Specifically, e.g., travel management planning: Agencies should commit to work with Tribes on a route by route assessment for future changes in the travel system, emphasizing conservation and cultural resource protection;	TRAVEL01-General, ALT05-Alternative E	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
18486-5	Anne Clare Erickson 329 Hillside Dr Moab, 84532		Arch Canyon is an incredible place and one that needs protection from off road vehicles. Having a perennial stream in the desert is so rare, we need to protect it for wildlife and to keep the water clean and usable.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18668-10	Vanessa Soncco		Close off Arch canyon to OHV use to protect cultural resources.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18686-4	Ed And Gisela Gunderson Los Alamos, NM 87544		We support expanding off-road vehicle closures to protect sensitive wildlands and resources.	TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. On BLM lands, all areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources and Geology section in Chapter 3for a discussion of impacts of OHV designations on paleontological resources.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
18865-1	Elisabeth Currit, Nathan Thompson		From May to October of 2023, I monitored various soil and vegetation parameters at 30 randomly selected sites, which included 4 categories of sites: foot trails (hiking paths or climbing approaches), motorized off-roading (OHV) trails, campsites (both established campgrounds and dispersed campsites), and sites which are undisturbed by recreational activity. My data show that on average, OHV trails have the lowest carbon sequestration potential of all the site types. OHV sites have high percentages of cyanobacteria dominated BSCs, but the lowest percentages of moss and lichen dominated BSCs of all site types. Moss and lichen dominated biocrusts are able to sequester ~10x more carbon than cyanobacteria dominated biocrusts. This likely means that before these OHV trails were established, there were much higher percentages of moss and lichen biocrusts present but that the intense and continuous use of OHV trails sent these highly developed moss and lichen BSCs back to an earlier successional state (cyanobacteria dominated). Because of this, I strongly support the limitations placed on OHVs by Alternative E, while still allowing limited OHV activity in some designated areas. This will allow for the recovery of these BSCs and, over time, will allow them to develop into later-successional moss and lichen biocrusts. My data show that foot trails (mostly climbing approaches) are the type of site that sequester the most carbon, so limiting this type of access is much less of an issue in regards to soil carbon storage and sequestration (although protecting cultural and historical sites from access in this way remains important). I am happy to provide any and all of my data that might be relevant or useful to this management plan.	TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan, there would be no designated OHV open areas. Under Proclamation 10285, new roads and motorized trails could not be designated unless to protect Monument objects or for human health and safety.
18914-3	John, UT 84105		Separation of OHV use and non motorized recreational use is to be encouraged. To some extent the terrain and existing wilderness designations limit a complete free for all, but I support Alternative E for additional restrictions on a recreational use that has gotten out of hand. However in areas where OHV use has already trashed the environment, it would be worthwhile retaining access and treating these as environmental sacrifices to the oil gods that enable this to be some sort of affordable hobby.	TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. On BLM lands, all areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
2026-4	Ainsley Cathcart		Adopt Alternative Es closure of Arch Canyon to motorized use. The final plan should also expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of BENM Travel Management Plan in the future.
3125-14	Steve Knox		Page 2-116, 2.4.21, Travel and Transportation Management, Table 2-20, 2020 ROD/MMP, Alternative Under Alternative E you propose to manage LWC for their wilderness characteristics. So, why dont you include LWC as additional areas closed to OHV travel? Allowing motorized travel in LWC will certainly impact opportunities for solitude and primitive recreation and most likely natural values as well.	TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. On BLM lands, all areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
8848-6	Robert & Ruth Fountain		We support closure of Arch Canyon to motorized use and also to expand closure areas to protect the Monuments most significant resources that are at risk from motorized vehicle damage.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning the agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of BENM Travel Management Plan in the future.
8999-31		International Mountain Bicycling Association	We feel adequate consideration for robust public access is not being applied in this Monument RMP. More options that allow for future adaptive trail management decisions which will seek to maximize public access with purposeful management can be provided for than what is currently offered in the DRMP under all alternatives and certainly the more unnecessarily Alternative restrictive E alternative. Often the BLM simply restricts access as the simplest option to achieve the same goals that can be achieved through a more intentional model. Unfortunately, the restrictive model leads to public frustration, opposition and at worse disregard.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan designates lands as either open, closed, or limited to OHVs. The agencies would develop an implementation-level travel and transportation management plan analyzing individual routes, in collaboration with the BEC and other Tribes and stakeholders including state and local governments. See Appendix H, Travel Management Plan Criteria.
8999-6		International Mountain Bicycling Association	Support for Alternative E with Modifications to the future of bike access: Alternative E is the agencies preferred alternative and maximizes the consideration of Tribal perspectives and Traditional Indigenous Knowledge (TIK). We appreciate that elements of TIK (and Traditional Ecological Knowledge) are integrated into most aspects of the plan, and that decisions affecting BENM management would be made in collaboration with Tribal Nations (via the BEC) in most cases. However specifically, IMBA supports and advocates for bike access to both front country and backcountry landscapes in order to provide diversity of experiences to a large segment of the biking community. We are displeased with Alternative Es restrictive policies on bicycle use and limitations to OHV areas. This oversight and restrictive alternative suggests that the BLM is simply not considering any options for the future of visiting and family bicycling public in this landscape and is ignoring its own recognition of the proclamations language that this is an important use and the regional demand is high. The Front Country, Passage Areas and Outback Areas are all appropriate areas for bike trail access in a variety of diverse settings and we encourage the BLM to better define these areas for where appropriate bicycle access to trails can be provided. Future TMPs will look to the RMP for guidance and w/o better clarity, bike access will continue to be unnecessarily stunted in this landscape.	TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan, the zones have been re-drawn and redefined to more accurately reflect on the ground existing and desired conditions. Under the Proposed Plan, mountain biking would be allowed on existing designated mechanized trails as well as all designated OHV routes in the Front Country, Passage, and Outback Zones.
9185-3	Kennard Woods		Alternative E would close Arch Canyon to motorized use. Alternative E also should expand closure areas to protect the Monuments most significant resources otherwise at risk from motorized vehicle damage.	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or

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					timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
9199-4	Linda Stitzer 143 Limestone Rdg SEDONA, AZ 86336		3) Travel management: The alternatives differ in terms of acres closed to OHVs vs. limited. I can't speak to use of OHVs in particular areas, but I support more areas be completed closed vs limited as in Alternative D. This would be more easily enforced. OHV impacts on the environment are well known and BENM is particularly fragile.	TRAVEL01-General, ALT05-Alternative E	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
F13-1			In addition to closing the canyon, I ask that Alternative E expand closure areas to protect any of the monuments cultural and biological resources like fragile deserts, endangered species habitats, and biodiverse riparian areas that may be harmed by motorized vehicle damage now or in the future.	TRAVEL01-General, ALT05-Alternative E	See Section the Management Actions by Alternative section in the Travel and Transportation section of the Proposed Plan for OHV area designations. See the Soil and Biological Crusts, Water Resources, and the Wildlife and Fisheries Chapter 3 sections for a discussion of impacts from OHV use on the resources listed in the comment.
F4-5			Please follow through with the closure of Arch Canyon to off-road vehicles because it will better protect water quality in the canyons rare perennial stream, safeguard the canyons abundant and irreplaceable cultural sites, and promote quiet and contemplative visitation	TRAVEL01-General, ALT05-Alternative E	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
F8-3			Please improve Alternative Es management of off-road vehicles on monument lands adjacent to the national parks by prohibiting routes up to park boundaries to minimize trespass and further preserve natural soundscapes, visual resources, clean air and water and wildlife habitat both in the Monument and the parks.	TRAVEL01-General, ALT05-Alternative E	See the Management Actions by Alternative section in the Travel and Transportation Management section of the Proposed Plan for OHV area designations. Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands.
18803-4	Shane Shumway Blanding, UT 84511		We do not agree with the proposed closures of Arch Canyon road in Alternatives D and E. We also own property that this road goes through at the mouth of Arch Canyon. By closing this road to motorized users you will be depreciating the value of our land.	TRAVEL01-General, ALT05-Alternative E, EJSOC01-General	Please see the Management Actions by Alternative section of the Travel and Transportation section of the Proposed Plan. Arch Canyon is in an OHV limited area and will not be closed but will require a permit. The permit system would be developed as part of the BENM Travel Management Plan in the future. For impacts from Travel and Transportation Management Actions on land values or economics see the Environmental Justice and Social and Economic Values section in Chapter 3.
16275-2			I am writing in support of choosing Alternative E for the Bears Ears NM Resource Management Plan with the following additions: 1) additional restrictions on OHV use in the area to protect the rich Native American history, 2) additional safeguards to prevent vehicles from trespassing onto adjacent protected lands, such as Canyonlands NP, 3) reduce areas permitted for livestock grazing and allowances for grazing, to those that allow the natural vegetation to recover annually.	TRAVEL01-General, ALT05-Alternative E, GRAZ01-General	The agencies worked with Canyonlands National Park when developing OHV area designations to protect soundscapes and reduce trespass (see discussion in the Lands with Wilderness Characteristics and the Natural Soundscapes sections in Chapter 3. See the management Actions by Alternative section in the Livestock Grazing section in the Proposed Plan for changes to areas unavailable for livestock grazing. Under the Proposed Plan, and Impacts Common to All Alternatives section in the Terrestrial Habitat and Vegetation Resilience and Conservation section in Chapter 3, livestock grazing would be managed in a way that maintains or makes progress towards meeting rangeland health standards, and all alternatives include management direction to mitigate the risks of the impacts of grazing on vegetation.
18238-61	Chaitna Sinha		We propose: The following management action should be deleted: Implementation-level travel planning would not designate non-motorized and non-mechanized trails in sensitive soils in locations where monitoring has shown degradation to these resources, unless necessary to ensure the protection of BENM objects, or unless there are no other feasible alternatives and those trails would be consistent with the protection of BENM objects. Id., p. 2-124. This management prescription is redundant and should be deleted. We have incorporated its provisions in other proposals.	TRAVEL01-General, ALT05-Alternative E, REC01-General	The agencies considered the comment but did not alter the Proposed Plan. The language for sensitive soils is redundant with actions in soils section, but including this in travel and transportation management will make the direction clear for this particular program and ease navigation of the document.
18238-85	Chaitna Sinha		Implementation-level travel planning would not designate new motorized and mechanized routes in riparian areas, wetlands, and water resources unless necessary to ensure the protection of BENM objects and in collaboration with the BEC. Id., p. 2-122. The Agencies should revise this management prescription to include sensitive soils and other water resources (taken from redundant prescriptions, below), remove new mechanized routes (see above), and identify actions that the agencies will take regarding routes that are impacting these resources. We propose: Implementation-level travel planning, in collaboration with the BEC, will not designate new motorized routes in sensitive soils, riparian areas, wetlands, 100-year floodplains, perennial springs and seeps, and other water resources unless absolutely necessary to ensure the protection of BENM objects and values. New motorized routes are those that may exist on the ground but that are not designated as OHV Open or OHV Limited in the 2008 Monticello Resource Management Plan or 1991 Manti-La Sai Travel Plan. The designation of new motorized routes will be in accordance with the relevant recreation management zone. Existing routes that are impacting Monument objects, including sensitive soils, riparian areas, wetlands, 100-year floodplains, perennial springs and seeps, and other water resources, will be closed, modified, or re-routed, and as necessary the area will be rehabilitated, to protect and restore these resources.	TRAVEL01-General, ALT05-Alternative E, REC01-General	Under the Proposed Plan, implementation-level travel planning would not designate new motorized and mechanized routes in the following areas unless necessary to ensure the protection of BENM objects, public safety and in collaboration with the BEC: riparian areas; wetlands; water resources, including 100-year floodplains, and perennial springs and seeps where monitoring has shown degradation; crucial big game habitat; big game fawning/calving habitat; sensitive soils. Implementation-level travel management planning would ensure motorized and mechanized routes that parallel or cross streams would be located to protect best complement riparian and aquatic ecosystems as well as road/trail and stream geometry. This includes locating crossings (fords) at points of low bank slope and firm surfaces wherever practicable. Existing trails would be maintained as necessary to protect BENM objects. See Appendix H: Travel Management Plan Criteria. The Draft RMP/EIS already contains language regarding the prohibition of new non-motorized and non-mechanized trails in areas of sensitive soils unless necessary for the protection of BENM objects (Management Actions By Alternative, Travel and Transportation Management, Chapter 2), in addition to the language cited in this comment regarding the protection of riparian, wetland, and water resources.
8999-13		International Mountain Bicycling Association	Allowing for trails to be specifically designated for mechanized use allows the BLM to manage bicycling more appropriately and with more discretion. It also allows a pathway to meet the Secretarial order on increasing e-bike access. The BLM has an e-bike rule that encourages access and inclusion for e-bikes on the landscape. With a National Monument, access for e-bikes could be provided for by utilizing the motorized definition exclusion tool or by designating limited OHV trails that allow only Class 1 e-bikes. We ask that the final RMP more clearly distinguish between	TRAVEL01-General, ALT05-Alternative E, REC01-General	Please refer to Management and Use of Electric Bikes on BLM-managed Lands IM 2023-051.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			motorized and mechanized use, add e-bikes to the overall designation equation and allow land managers flexibility to preserve access, and more importantly a quality experience, for bikes and e-bikes on trails and roads that are closed to motorized users. As currently written, Alternative E considers motorized and mechanized uses together in most cases, which could lead to certain trails being closed to bikes when a trail may be capable of supporting mechanized travel without impacting BENM objects.		
18657-56	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Given the long management history of the motorized routes in this area and their extreme importance to the local economy in enabling all forms of recreation within the monument, any significant closures of motorized routes mandated in the new monument management plan simply cannot be justified either legally or factually. We therefore urge the agencies to consider and adopt the following general provisions regarding travel management: 1. Keep all existing OHV area designations from current management plans. The 2008 Monticello and Moab Field Office RMPs, the Manti La Sal National Forest forest plan, and the 2020 monument management plans have already thoroughly evaluated what areas are suitable for OHV use and what areas are not. There is no need to designate additional areas as OHV-closed. The current OHV-limited designation across every part of the monument where OHV use is allowed is fully sufficient to limit OHVs designated routes. Any changes to individual route designations should be made as part of a later travel management process, which is far better suited for detailed analysis of individual routes than a high level resource management plan. The recent trend in federal land management has been to separate route specific travel management planning from resource management planning. Thus the agencies should avoid making decisions regarding individual routes in this planning process and should leave decisions regarding individual routes to future travel planning.	TRAVEL01-General, ALT06-Proposed, NEW	43 CFR 8342.2(b) requires the BLM to designate all public lands as either open, closed, or limited to OHVs during the land use planning process (also see MS-1626, Section 3.1, area designations). The Proposed Plan includes area designations in accordance with that legal requirement. Under the Proposed Plan, areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM-managed lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. See Appendix H, Travel Management Plan Criteria. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
18657-58	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	We urge the agencies to continue to follow the general travel management guidance established in the 2020 Bears Ears management plans. Specifically, we support maintaining all individual route designations under existing travel management plans until a new travel plan is developed. We also strongly support provision TM-4 from the 2020 Indian Creek and Shash Jaa Units Management Plan, Implementation-level travel planning in SRMAs and Extensive Recreation Management Areas (ERMAs) will recognize the San Juan County OHV route system and integrate it to the extent possible in travel management and recreational goals and objectives. We are disappointed to see this provision not carried forward in the draft management plan, which merely says the agencies should, coordinate with local government and the BEC and other Tribal Nations on implementation-level travel planning. This replacement provision is utterly insufficient, and we urge the agencies to restore the provision requiring specific recognition of the San Juan County OHV trail system. San Juan County has long maintained a thorough inventory of existing OHV routes and each route on their maps is extremely important for motorized recreation. Most routes in their route system are also claimed R.S. 2477 roads that should be kept open pending final resolution of their legal status.	TRAVEL01-General, ALT06-Proposed, NEW	See changes in the Management Common To All section in Chapter 2 for travel and transportation management in the Proposed Plan. The agencies have included language that the agencies will coordinate with state and local governments. The State of Utah and its counties may hold valid existing rights-of-way (ROWS) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
18657-59	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	We support the adaptive management framework for motorized use established in provision TM-6 of the 2020 monument management plans: As part of implementation-level travel planning, monitor OHV use areas and, if unacceptable impacts to natural and cultural resources are occurring, develop implementation-level limitations including route designation, route closure, motorized vehicle size and weight limitations, or other mitigation measures as necessary to address those impacts. Any route closures or other management measures should be developed in response to specific unacceptable impacts identified through monitoring, not done preemptively based on pure speculation. The best way to manage OHV use in the monument is with the least restrictive approach first, leaving room to escalate to increased restrictions later when necessary.	TRAVEL01-General, ALT06-Proposed, NEW	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM-managed lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. See Appendix H, Travel Management Plan Criteria. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
889-53	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The final specific area we wish to comment on is Comb Ridge. This prominent ridge has numerous valuable motorized routes both on its top and ascending up its sides. It includes routes like Poseys Trail and the original roadbed of highway 95, which is now a moderately difficult 4x4 road ascending up the original Comb Ridge Dugway. The routes on top of the ridge access numerous scenic overlooks and hiking trailheads to ancestral puebloan ruins, thus providing critical access to many of the most important cultural sites in the monument. This access benefits both tribal members and non-Indian tourists visiting these sites to appreciate their history and should not be lost. We note that the Comb Ridge area was already fully evaluated in the 2020 monument management plan for the Shash Jaa area, which considered at least one alternative that would have closed most of this area to OHV use. The BLM ultimately rejected this alternative and determined to continue managing it as OHV-limited, with route-specific decisions deferred to later travel planning. There are no changed circumstances which have arisen in the last four years which justify reconsidering this decision, and we urge the agencies to stay the course and carry through the BLMs prior decisions regarding this area in all action alternatives. The roads on Comb Ridge are largely outside of inventoried lands with wilderness characteristics, and have existed for many decades. Most of them are claimed as R.S. 2477 roads by the State of Utah, and they are not causing any harm to monument objects and values. There is no justification for closing any parts of Comb Ridge with existing motorized routes to OHV use, and we oppose the consideration of any alternatives that would do so. We note that alternative D would close	TRAVEL01-General, ALT06-Proposed, NEW	Under the Proposed Plan, most of the Comb Ridge formation north of SR 95 (including most of the routes alluded to in the comment) would be within an area designated as OHV limited. The Comb Ridge formation between SR 95 and US 163 (generally bounded by the cliff line to the west and Butler Wash to the east) was inventoried as having wilderness characteristics and is managed within an area designated as OHV closed. The State of Utah and its counties may hold valid existing rights-of-way (ROWS) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			part of D0213 in this area, which we strongly oppose as this route provides valuable access to the eastern side of Comb Ridge.		
916-1	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Develop a Reasonable Alternative to Address the Publics Need for More Motorized Access and Motorized Recreational Opportunities [see letter for further detail and rationale]	TRAVEL01-General, ALTO6-Proposed, NEW	The Proclamation provides direction regarding development and designation of additional motorized routes. Specifically, Proclamation 9558 prohibits cross-country motorized vehicle use except for emergency or authorized purposes and prohibits the designation of new roads and trails for motorized vehicle use unless they are for the purposes of public safety or the protection of Monument objects. As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments. Impacts from travel planning would be analyzed when travel plans are prepared in the future. As described in the Alternatives Considered by Not Analyzed in Detail section in Chapter 2, the agencies considered alternatives aimed at increasing motorized access.
8849-1	Jason Brown		I fully oppose the closure of 16 backcountry airstrips within Bears Ears. I am a user of these airstrips. Aircraft have the least impact of any OHV. These airstrips provide access to not only recreational users but also to emergency responders. Please consider the impacts of closing these airstrips in the backcountry. They have been there for a very long time with no environmental, or otherwise negative impacts. There is only benefits to keeping them accessible.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
886-1	Lawrence Martin		On bw, half the BEARS EAR national monument proposal, as a Back country pilot I am urging the use of the strip as part of public useage. Air[lanews and their pilots leave littel foot print except the air strip. No impact on public lands. In times of emergency, an airstrip cna provide vital assistance to persons as well as Gov needs. Time often saves lives and property. Noise abatement is always a concern and part of aviators effort to keep the ev\nvironment as pristine as possible. I urge BLM to consider the continues use of this amenity.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
888-1	Dustin Dickerson Mapleton,	Utah Backcountry pilots	Please help keep the backcountry airports open. Back country pilots are of like minds that enjoy the back country of Utah and help preserve our outdoors. Pilots are great at cleaning up after others and of being good Stewarts. Please allow us to continue to help watch over the outdoors by being able to fly into these back country runways.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-114	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	These airstrips serve as recreational assets beyond mere transportation hubs. They support dispersed primitive camping and reduce the environmental footprint by limiting the need for road-based access, which is increasingly significant given the rise in backcountry vehicle use. By eliminating miles of road traffic, airstrips lessen dust and surface disturbance, which are unavoidable with road vehicle access	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-51	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The motorized routes in Beef Basin, Imperial Valley, and on Bridger Jack Mesa are all incredibly important motorized routes that provide critical access to some of the most remote areas on the monument and adjacent public lands. It is crucial that all of them remain open to motorized use and we strongly oppose the adoption of any alternative that would mandate their closure in the name of wilderness characteristics. All of these roads are claimed by the State of Utah as R.S. 2477 roads and closing them would inevitably prejudice future litigation to resolve their legal status.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS need to protect soundscapes and visual resources. However, some locations, including the routes leading to Elephant Hill, were designated as OHV limited in order to preserve NPS permitted opportunities. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands. Some routes within Beef Basin adjacent to NFS lands are within OHV closed areas in order to protect BENM objects. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
1488-1	Jerace Glover, Kristin Glover	Castle Country OHV Association	The Arch Canyon Trial should remain open. It allows people like me who arent going to be able to hike the several miles up the canyon to view all of the neat sites and to observe the substantial history within the canyon. The majority of all the ruins are super high up the canyon walls and as a UTV user you ride the trail and to see the ruins you are using binoculars. Users are not disturbing the ruins from binocular distance. The trail is in the bottom of a wash which qualified for rs2477. The trail ends and you are able to walk up the trail to see some other great arches. A machine doesnt go up there. This trail is well defined and doesnt have any substantial issue erosion, off trail use etc. by shutting this trail down you are depriving users who have disabilities or are unable to hike for miles the privilege of seeing the history and natural beauty and formations of this canyon. It has been through several reviews each time it has remained open as the impact is deemed that its not an issue to remain open. Also the Grand Canyon trust has already made a statement stating the Monticello field office manager has already assured the tribes etc that arch canyon would be closed before the public comment period or any such examination.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future. The State of Utah and its counties may hold valid existing rights-of-way (ROWS) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
1669-4	Kurt Thams 375 Tola Ranch Road Soquel, 95073		The role of airstrips extends beyond recreational aviation. They are vital for firefighting efforts, search and rescue operations, and emergency medical services. These airstrips provide essential access points for pilots who may need to make precautionary or emergency landings, ensuring safety and accessibility in remote areas. Additionally, they offer an invaluable resource for individuals who might face challenges traveling via other means, thereby democratizing access to our public lands.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
7339-2			Travel management planning: Agencies should commit to work with Tribes on a route by route assessment for future changes in the travel system, emphasizing conservation and cultural resource protection;	TRAVEL01-General, ALT07-Modification of Existing Alternatives	As part of implementation-level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments.
889-108	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Mikes Canyon is a more obscure motorized route in the southwestern corner of the monument. It is 8.7 miles long and climbs the Red House Cliffs before following the wash at the bottom of East Fork Mikes Canyon. It ultimately dead-ends on a mesa in a remote canyon system at what is likely an old mine site. While there is little information about it online and this road appears to be rarely driven, it provides the only access into an extremely remote part of the monument. Visiting this region would be nearly impossible without the road, as there are no other roads or hiking trails anywhere near it. This road should continue to stay open to allow the few who venture this far to explore the area, rather than closing it, which would likely result in no one ever visiting the area because of the lack of any real hiking destinations there.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	This route is within an OHV limited area under the Proposed Plan.
8985-1			Back country airstrips provide a unique opportunity to enjoy the beauty that Utah has to offer. Back country airstrips leave very little impact on the environment and should be allowed to remain open.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1006-2	Tim Lapage Park City, UT 84060		All 18 of the airstrips have existed and been in use for the past 40-70 years and we request that none of them be closed or banned arbitrarily without first evaluating the merits of each. Small non commercial aircraft Cause no environmental stress and there use of the airstrips are short term and damage nothing and harm nobody. To close them would be a violation of rights, And would not achieve anything.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1009-1			Please do not restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode, and these strips have been open for many decades without incident. Access to the backcountry out west is being restricted on a daily basis. What good is creating all of this wilderness if no one can enjoy it? Public land should be available to the public!	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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					aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1010-1	Stephen Barr		I am opposed to shutting down any of the private landing strips in this region. These facilities have been in use for at least the last 40 years. Providing more access to the backcountry is what we should be doing. Not limiting it. General aviation is the only way some folks have to access these regions.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
10-2	Lisa Potter	Colorado 4x4 Girls	I do not support closing any additional motorized trails and I firmly believe that FAIR due process should be followed out in all cases. Comments and money from big environmental groups such as SUWA should not be the only voices heard. These lands are for all public use - not just the few physically capable elites. Veterans fought to keep our country and lands free and we should provide them access - many are which are getting older or were disabled from their service and can no longer walk/hike in restricted areas. Thus why it is so important to keep the few remaining motorized trails open. Other public members have disabilities from birth, accidents, age etc. the no also do not allow them to enjoy the backcountry without motorized vehicle means. So PLEASE- NO more road closures!	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	43 CFR 8342.2(b) requires the BLM to designate all public lands as either open, closed, or limited to OHVs during the land use planning process (also see MS-1626, Section 3.1, area designations). The Proposed Plan includes area designations in accordance with that requirement. Under the Proposed Plan, areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. See Appendix H, Travel Management Plan Criteria. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
11697-1	Patrick Haehnel		Please do not close any airports in the Bears Ears National Monument. My experience in ATV, dirt bike, camping, hiking, and mountain biking compared to back country flying has shown me that impact of back country airstrips is minimal and the advantages are numerous. There are many reasons, practical, economical and constitutional, to keep these strips open. Having these strips open is in keeping with the purpose & mission of having public land. Access to these airstrips by private, non-commercial, fixed-wing aircraft for recreational use, has been available for the past 40-70 years. Back country flying has a very small environmental footprint, arguably the lightest footprint form of access to these lands. Access by air requires NO roads, trails, or other infrastructure like bridges or fences for animals and eliminates dusty road traffic. I recently learned that Utah backcountry airstrips predate the 1964 Wilderness Act. Access and use of these airstrips should be retained for public enjoyment. Aircraft noise is less impactful than many other off-road vehicles and it is short lived. Because of their design and location, back country airstrips do not add to the complexities of land management, specifically soil disturbance or erosion. Airstrips provide vital access for medical emergencies, evacuation and land management efforts. These airstrips offer valuable options for aircraft that have to deviate due to mechanical problems or unforecast or deteriorating weather. This can be life-saving while flying over the relatively unforgiving terrain in southern Utah. Aircraft noise has proven to have no detrimental impact on wildlife. Backcountry airstrips offer recreational access to the disabled and those with limited mobility. As I have aged, my wife and I appreciate the convenience of being able to access the backcountry in this enjoyable and relatively easy way. These existing airstrips are recreational assets, and provide for dispersed primitive camping, especially with increased use of the backcountry by boondocking road vehicles. My wife and I started enjoying this 33 years ago when we honeymooned at back country airstrips in Idaho. We still enjoy visiting other back country destinations and getting away from it all. This is an important purpose of parks and public lands. Airstrips are great starting points for other non-motorized, low-impact activities and my experience has shown me that backcountry aviators practice Leave No Trace ethics. Keeping these airstrips open also brings organizations like The Recreational Aviation Foundation and the Utah Backcountry Pilots out to work in with the BLM and USFS to provide maintenance of backcountry airstrips, saving administrative resources that can be used elsewhere.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
12336-1	Levi Mellows 600 Butler Creek Ave Belgrade, MT 59714		I am writing in regards to the potential for backcountry airstrips possibly being closed around the Bear's Ear's in NM. It's extremely frustrating to hear this since I am involved in the community and it is a big part of my life. The truth is that backcountry aviation has very little impact on the land and even much less when you compare it to everything else that is allowed. The aviation community cares about the land and does it part to leave no trace. There is an amazing amount of enjoyment that can be had from the access of these strips for camping and enjoying the outdoors and it would be a real shame if they get closed. Preservation for the generations to come should be more of what is being discussed instead of how to close these places.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
12657-1	Chris St.Germain		Regarding the Bears Ears National Monument in Utah, there are proposals that would restrict flying into existing airstrips. One of the lovely things about the US is the amount of beautiful, majestic country to visit and view, particularly in places like Utah. I would strongly urge BLM and management organizations to NOT restrict aviators ability to fly into these existing areas to enjoy. These same	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			strips are not only valuable for recreation, but are also available for use for public safety aviation such as rescue, fire fighting, forest management, etc.		designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
13059-1	Josef Bostik 1043 Straw Hat Ln. Draper, UT 82040	Utah Back Country Association	The back country airstrips are essential for safe glider operations in Utah. We use those as emergency landing fields. In addition they serve as potential emergency retrieve places for stranded pilots and for recreational use. Please assure continuous access to these airfields to maintain aircraft access for safety and recreational purposes.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
1397-1	Robin Maidrn		Please do not close the airstrips on BLM land! These are treasures I look forward to sharing with my grand children. Flying to and visiting these great places are some of the greatest freedoms we have in this nation. Please keep them open!	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1401-1	Bill And Suzi Vietti 5617 ROUNDTREE ST Shawnee, KS 66226-7910		My wife and I have flown our powered parachutes into several of these back country strips and they provide a safe landing site in remote places that allow pilots to explore places that would otherwise be unreachable. Please protect these special strips	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
14301-1	Robert "Bob" Jacobs 539 Camino Tres Arroyos Santa Fe, NM 87507		I have had the opportunity to fly into several of the airstrips that are on the list of closure and I want to strongly petition for their remaining open for pilots like myself who in my 70s can only access this type of Backcountry using my airplane.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
14869-1			I am writing to preserve public access via aircraft to airstrips within the subject area. Many airstrips have been in continuous use for 40+ years. Access to many the areas served by airstrips is possible only by aircraft, which do not adversely affect wildlife or natural values. The footprint of light aircraft is much smaller than surface vehicles, and noise produced is transient and minor. I have hiked and backpacked for more than 50 years. As my I age, I depend on my aircraft for access to places that previously would have taken many, many days to access. The established air access to the Bears Ears area is used by many people such as myself to access this wonderful area. Closing existing airstrips would cut off access to a whole group of wilderness users.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1489-1	Kevin Lontz		Please do not close the existing Bears Ears primitive landing strips that have existed for so long. Not only is having access for safety a valuable resource and capability, but this allows certain non-road motorized access that so many enjoy and use.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15065-3	William Murrow 2060 State Highway 595 Lindrith, NM 87029		Note also that many aircraft designed for backcountry use are quite capable of landing on airstrips that have received little maintenance and might be considered overgrown by users of cars or ATVs. Such strips should not be closed.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43

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					CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15065-5	William Murrow 2060 State Highway 595 Lindrith, NM 87029		I am opposed to the closure of the historic airstrips located within the Bears Ears National Monument. I understand the closure of some or many is being considered. In my many years of flying I have never received any complaints from other users or the governing agencies about my use of backcountry or rural airstrips, including many on BLM lands. I find this is typical for other aviation users of our public lands.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15164-1	Cameron Peterson		I want to add my voice in favor of keeping airstrips open to public use as part our the resource management plan. Users of backcountry airstrips are conservation minded. We all practice the principles of leave no trace, and leave out better than you found it. Just as hiking trails provide access to wilderness, ensuring airstrips remain open will enable an additional form of access especially to the more remote locations. Air strips are diligently maintained by the flying community. On air strip camping is low impact. Remote airstrips are part of the history of these areas and can be utilized without impacting the surrounding wilderness.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15474-1	Therese Bohusch, Jeff Franklin		Please secure uninterrupted and continued recreational access for aircraft to all Utah Back Country Airstrips, including those in the Bears Ears National Monument. Some of these airports have been in existence for 70 years, providing historic occupational, recreational and emergency access to the back country.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1548-1	Ray Ballantyne 402, Kitfox Ln Sequim, WA 98382		Although I live in Washington, I look forward to recreating to the Utah backcountry in early spring while everyone else has cold and snow. The strips allow my wife and me to have a trailhead without using any roads. The airstrips should have grandfather rights being constructed prior to land designation change.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
15646-1	T. J. Reynolds		I want to express my adamant opposition to the closure of the following backcountry airstrips: Browns Rim, Clay Hills Crossing, Dark Canyon North, Dark Canyon South, Deer Flat, Dry Fork Canyon, Fry Canyon, Fry Canyon South, Hammond/Kigalia Point, Lockhart Basin, Lockhart Road, Long Canyon, Mule Canyon, Polly Mesa, Red House Spring, Sipapu Bridge, Valley of the Gods. The reasons for my opposition are many but the main concern is for Safety. These strips are a valuable resource for emergencies for aircraft as well as for firefighting operations or for search and rescue. These strips are virtually unseen and provide a leave no trace method of recreation. The land that these strips are on is public land and should remain open for use by the public like it has been for decades.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
15690-1	Kelly Rapp		One of the best ways to explore and enjoy our gorgeous Utah landscape is via the air, being able to take in both the unending majesty that stretches to the horizon as well as the close-up intricate details of a small hillside. Backcountry pilots and the airstrips that allow them to operate and recreate in the backcountry are important parts of our ability to interact with the outdoors. We are part of a small group of people who truly respect and honor our environment through conscientious recreation. Closing areas to use like this can often grow their illegal and reckless use harming both the habitat and the people continuing to recreate in those areas. Backcountry airstrips are only a few hundred feet of land that open access to hundreds of acres of the natural world. We see ourselves as stewards of these small strips and pledge to continue using them responsibly. We fully embody the	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			leave-no-trace ideology while being able to utilize small areas of primitive infrastructure. Please reconsider closing the Bear's Ears area to backcountry aviation.		
1570-1	Matt Landel 429 Shore Drive Laconia, NH 03246		As a raft guide for many years, it was my pleasure to be able to introduce many people to areas of wild beauty that they would otherwise never have experienced. Aviation provides a minimal-impact method for accessing these remote locations. The limited cargo capacity of most back-country aircraft further limits the ability of these visitors to impact their surroundings. To shut down these access points even before a full evaluation has been performed, much less an evaluation of each individual strip, is a backwards approach to determining whether access to these sites is in the best public interest. After all, all of the airstrips have existed and been in use for the past 40-70 years with no evidence of detrimental impact. Therefore, I request that none of these airstrips be closed or banned arbitrarily without first evaluating the merits of each location and the unique opportunity that each provides for backcountry access.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1576-1	Robert Jones EAA Chapter 1241 Florida Keys		On behalf of the 150 members of EAA Chapter 1241 in the Florida Keys, I urge BLM to keep all 18 backcountry airstrips in Bears Ear National Monument open for public access. Although EAA Chapter 1241 is located in the chain of islands below Miami at the very southeast corner of the US and far away for BENM, you may be interested to know that we have members who tour literally all across the United States every year, taking advantage of publicly owned backcountry airstrips to enjoy the scenic beauty and spectacular natural outdoors that are unique to our great nation's public lands. The nature of aviation is that it shrinks distances and travel time while creating access to lands all across the US that would be inaccessible otherwise.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1577-1	Christopher Bardon		As a pilot and avid outdoorsman, I am writing to express my strong support for the preservation and maintenance of our nations backcountry airstrips. These airstrips are not only a vital part of our aviation infrastructure but also serve as crucial access points for a variety of activities and services that are essential to the well-being of our remote communities and the conservation of our wilderness areas.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1594-1	Janell Marker, Michael Marker		I would like to comment in support of preserving historic backcountry airstrips in or near the Bears Ears National Monument (BENM). These airstrips were created in the 1950s because of uranium exploration during the Cold War well before the BENM was created. We request that these airstrips be preserved and continue to be accessible to aircraft for the following reasons: 1) They offer access to recreation for those with disabilities and limited mobility to use our public lands. I am a senior citizen who is an active pilot, but can no longer hike, backpack, or ride a horse for long distances. This is a low-impact way for us to continue to enjoy using our public lands. 2) They provide low-impact access to reach hiking trails or to camp. Airplanes have a small environmental footprint as their operation is limited to these airstrips where they land and take off. Pilots are also very conscientious about "pack-it-in/pack-it-out" and even clean up what others have left behind. 3) They provide an opportunity for pilot organizations such as the Recreational Aviation Foundation and Utah Back Country Pilots Association to volunteer their time and resources to help government agencies maintain those areas. 4) If these airstrips are maintained by volunteers working with government agencies, they can be used during emergencies for firefighting or rescue efforts. 5) Aircraft flying over these remote areas may use these airstrips to make emergency landings when needed. Airports are widely scattered in the area and these airstrips provide a measure of safety during emergencies.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
15974-1	Susan Flavel 87 South 300 East Blanding, UT 84511		Please keep the proposed monument acreage open and accessible for all to enjoy and benefit in gathering wood and dispersed camping. These activities are very important to our families. Dont close existing roads!	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The agency will develop implementation-level plans to evaluate existing dispersed camping activities with respect to resource protection, and to the extent feasible, allow for continued dispersed camping recreational activities. See the Forestry and Woodlands section in Chapter 2 and Appendix A maps for details on woodcutting. The Proposed Plan designates lands as either open, closed, or limited to OHVs. The agencies would develop an implementation-level travel and transportation management plan analyzing individual routes. See Appendix H, Travel Management Plan Criteria.
15991-1	Lauren McGavran	New Mexico Pilots Association	We are asking that you not close the backcountry airstrips without analyzing the impacts and benefits of each airstrip individually. These decisions are more appropriately addressed in a travel management process; section 3.5.8 specifies that OHV usage designations are to be done outside the management planning process. We argue that private general aviation usage of backcountry airstrips is a compatible use and that the blanket closure is overly restrictive. Our arguments follow. The documents do not go into detail about the rationale for a blanket closure of these airstrips. The documents do not specifically address how the airstrips affect the Issues identified in ES-3. There is no data for the impact that the airstrips have on noise, dust, wildlife, cultural resources, etc. There are no usage statistics for the airstrips. There is a section (3.2) that acknowledges the lack of data; it says that complete data will be presented in the project level NEPA documents. What is presented in this Planning document does not justify closing the airstrips. Private fixed wing aircraft are one of the	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			lowest impact forms of motorized recreation on public lands. The only ground disturbance is the airstrip, as opposed to miles of roads and support facilities that are needed for other vehicular access. For example, the total length of all the airstrips proposed for closure is 10 miles; there are over 1000 miles of dirt roads in the Monument. These dirt roads account for 75% of the fugitive dust in the Monument. The airstrips tend to be on relatively flat, elevated places where erosion is not likely to cause runoff into waterways. Airstrips are not located in sensitive riparian areas. Aircraft are included in the definition of an Off Highway Vehicle (OHV); prohibiting their use of land that is otherwise open to OHVs is inconsistent. The noise from small fixed wing aircraft is only loud during takeoff, and that phase of flight is brief. Several sources of data from the FAA show that the takeoff noise level, as the FAA requires it to be measured, is roughly 75-80 dB for a Cessna 182. This aircraft is a typical, representative aircraft for backcountry use. After takeoff, the airplanes gain sufficient altitude and the pilot sets cruise power, both of which reduce the noise level significantly. Aircraft will be flying at 70-130 mph or more, so at any one place, the noise will diminish rapidly, and will remain noticeable for only a few minutes at most. At least one study (by the University of Montana) has shown that the noise from airplanes does not disturb wildlife. The draft EIS/RMP proposes a soundscape management plan. A sound study will quantify the noise impact of the airstrips. Baseline data, with the airstrips open, is needed in order to collect accurate data. The current document does not address noise from the use of these airstrips. It mentions noise from overhead jets, and projects increased noise from increased usage and air tours (3.4.13.1). These sources of noise are different from each other and cannot be considered together. They require different mitigation efforts. For example, closing the backcountry airstrips will not diminish the noise from either commercial jet flights or commercial aerial sightseeing tours. Closing them will not decrease the noise from the vehicular use of roads. None of the airstrips is in a Wilderness Area or a Wilderness Study Area. There are roads by the airstrips already; as long as those roads are open for vehicular traffic, the use of private fixed wing aircraft will not cause significant additional impact. These airstrips have been in existence for 40-70 years or more, and there have not been any complaints registered about people using them. At least some of them are old enough that they would be grandfathered in should the surrounding area be designated as a Wilderness Area. These airstrips are not heavily used, and have not been a problem, as shown by the lack of complaints. However, the airstrips are very important to the pilots who use them. Aviation is the mode of access for these visitors, who fly in, land, and engage in non-motorized recreation. These uses are completely compatible with the National Monuments purpose. There is an aviation culture of recreational users who want to enjoy the land; our mode of access is simply not the same one that most people use. Our impact is small by comparison. Therefore, we request that the airstrips remain open unless studies, specific to each airstrip, demonstrate that a closure is warranted. A sound study must be done, including baseline data with the airstrips open. The state of the airstrips (open or closed) should be decided in the travel planning process, as specified in section 3.5.8, not in this Resource Management Plan.		
1600-1	Denver Feuerbach		I think rather than closing 16 airstrips it would be better to develop noise abatement procedures like many airports in densely populated areas have. That would serve to continue to allow their use while also minimizing disturbances. If not that, then continue to allow use of the other 16 airports on a rotational basis like 2 are open for 1 month then a different two are open and so forth rotating through the airports every 8 months.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
16066-1	GARY HILLEY		I am writing to urge you to keep aviation as an approved use and allowing all the airstrips to remain open in the upcoming management plans for the areas in and around the land designated in Bears Ears NM	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
16136-1	Mike D, CO		As a backcountry pilot I would like for the BLM to preserve the airstrips in the Bears Ears National Monument. Most back country aircraft are lighter and use larger tires that minimize the impact on the ground surface.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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16347-1	Doug Burch		I implore that you will continue to allow access to the Bears Ears National Monument and all other back country airstrips that our country has to offer. These are public lands that most will only see in photographs or video, but as an aspiring back country pilot, I will have the opportunity to see these lands with my own eyes, unless they are shut down to the public access that we have had for so many years. Similar aircraft with the engine I will be flying is quieter than most other aircraft and to the Off highway vehicles and especially the 2 stroke motors that are still in use today.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
16370-4	Wayne Hoskisson		The other urgent need in management is controlling off road vehicle use. Except under tightly controlled conditions ORV use is destructive of monument values. Arch Canyon should be closed to motorized and mechanized uses.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1642-1	Deryck Reed		We leave no trace, we respect others experience by minimizing our noise, and share our knowledge with other pilots and adventurers. The airstrips in the Bears Ears National Monument are a precious treasure for us and future generations. These strips should be preserved, maintained, and respected as low-footprint access points for adventure, science, and emergencies. Organizations like the Utah BackCountry Pilots Association with solid leadership and member participation should be leveraged to help maintain these airstrips. Please keep these airstrips alive.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1669-1	Kurt Thams 375 Tola Ranch Road Soquel, 95073		I am writing to express my deep concern regarding the proposed limitations on aviation access to public lands as outlined in the draft Resource Management Plan (RMP) for the Bears Ears National Monument (NM). As an avid backcountry aviator, I have a profound appreciation for the unique and non-intrusive access that aviation provides to these beautiful and historic lands. The proposed restriction to only Bluff Airport and Fry Canyon Airstrip is troubling, as it would effectively close access to the other 16 airstrips, many of which have been established and recognized since the 1950s.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
16943-1	Barbara Krizek		I urge you to reconsider the proposed draft RMP for Bears Ears NM. The draft RMP would in effect close 16 airstrips in Bears Ears that have been identified as such by the Department of Interior going as far back as the 1950s. I've spent my life working as a biologist for various Federal land management agencies as well as State Game and Fish and a Tribal wildlife program. I have taught Leave-No-Trace practices while working for a National Forest in Arizona. I "get it" when it comes to wanting to preserve a "Wilderness experience" and preserve habitats and animals. But back country aviation is absolutely unrelated to the devastating effects of the OHV (4-wheeler) boom. 100% apples and oranges scenario where aircraft are being lumped into "OHV" unfairly. Back country aircraft by their nature have limited impact on long-established airstrips while road OHV users habitually show their disrespect for landscapes by driving off-route on extreme inclines or in sensitive habitat areas simply because their vehicles have the capability. By the nature of being transient, aircraft noise is limited to take-off/landing, while camped 4-wheelers create chronic noise. I've also been involved in Search and Rescue operations and the importance of the availability of back country airstrips for rescue or for staging ground rescue operations cannot be understated and can make the difference of life-death in the "critical hour". They are also important in case an overflying transient aircraft needs to make an emergency landing due to engine issues. The fact that there haven't been any complaints lodged against backcountry aviators for noise, littering, or disrespect points to the saying "if it aint broke, don't 'fix' it". As a member of the Utah Back Country Pilots Association, I can assure you that we will continue to be partners to BLM and thoughtful stewards of back country aviation ensuring safety and responsible use for generations to come.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
16988-6	Andy Blair 1690 East 2000 South Driggs, 83422	The National Outdoor Leadership School (NOLS)	Road Access: Maintain vehicle access in the Remote Zone to the following roads Lockhart Basin Road, North Long Point Road, Dark Canyon Plateau Road, Clay Hills Road, Collins Trailhead Road, Step/Pine Trailhead Road, Todie Flat Trailhead Road, Sheiks Canyon Trailhead Road, Government Trailhead Road, Slickhorn Trailhead Road, Cigarette Springs Trailhead Road, Fish/Owl Trailhead Road, Texas Flat Road, Jacobs Chair Road, Shay Mountain, Vega Creek/North Cottonwood, Maverick Point, Davis Pocket, Ruin Canyon, Beef Basin Wash, Deadman Point, Dry Mesa, Milk Ranch Point, Indian Creek, Shay Mesa, and Reservoir Canyon. Road access allows people of varying abilities to access remote areas within BENM and experience those spaces. Many of these roads also allow for the support of our courses while they are in the backcountry. They allow us to deliver food resupplies in relatively remote locations without pulling our courses out to the frontcountry travel corridors, which disrupt the backcountry experience. These roads allow our students to experience a deeper, immersive experience in the backcountry of BENM.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, the zones have been re-drawn to more accurately reflect on the ground existing and desired conditions. These redrawn areas address many of the commenter's concerns, including the inclusion of the Passage Zone around the Butler Wash Road to allow for development of trailhead infrastructure to protect BENM objects. Under the Proposed Plan, the Remote Zone has been redrawn to exclude all of the roads referenced in the comment.

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1700-1	Michael Vivion		Back country pilots are very good stewards of both the airstrips they visit, but also are strong and vocal supporters of proper management of these back country areas. While backcountry pilots are operating potentially noisy mechanical devices to access these airstrips, the noise they generate is momentary, as the aircraft rapidly land or pass onward. Pilots tend to be very good stewards of back country. In my 34 years working on National Wildlife Refuges, most of which was in Alaska, I became quite familiar with the kinds of abuse some user groups tend to inflict on conservation areas. That said, I can honestly say that in my literally hundreds of visits to back country airstrips, I have hardly ever found so much as a single piece of trash. Here in Montana, we have one relatively remote airstrip, which is also accessible by four wheel drive vehicles. The visitors in the autos frequently trash the surrounding area, and often track up the airstrip, but visiting pilots generally pick up trash, repair damage, and leave the place cleaner than they found it. It would be a travesty to close these sixteen airstrips, where the visitor use is the gentlest of any group of visitors to this Monument.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1734-3	R. John Blackwood		It would be a shame to lose these back country airstrips that have been enjoyed by many for the last 40-70 years. Back country airstrips give such a wonderful way to access, see and enjoy our nations beautiful public lands with the least amount of impact. What ever is causing the threat of closing these airstrips, I believe other solutions must be created or found to maintain and keep most of these airstrips open to the public to enjoy.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1735-1	Harvey Madison 129 Enchanted CV Austin, 78737		I urge the BLM to not close the 16 targeted runways in Bears Ears. I'm not sure why closing those runways is even being considered. It makes no sense. I understand that the RMP is being considered for revision, which is a good idea. It's important to modify rules as needs and challenges change over time. But preemptively shutting down backcountry airstrips on the chance that they might end up being closed once the revised RMP has been decided upon is, frankly, overstepping the revision process. If you haven't issued official rules & regulations, then you're unfairly revoking a privilege afforded general aviation pilots and anyone who flies with them to enjoy the natural beauty of our nation's wilderness. You've skipped due process, and that's not ok. Besides recreation, bear in mind that remote runways can and are used for search and rescue, firefighting, etc. Also, planes in distress often use backcountry runways to save their lives when mechanical or weather-related emergencies occur. They can and will continue to do so even if you close the 16 runways you're considering closing, but by closing them now, even if the intent is a potentially temporary closure, it makes it much harder to reopen them given that those strips will undoubtedly become overgrown and hazardous to use as runways. Respectfully,	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1756-1	Jared Esselman		The no back country airstrips should be closed. The back country airstrips are valuable gems to our state for eco tourism. Since they have such a small footprint and since pilots follow the rule of packing out more than they packed in, meaning we clean up after ourselves and others, these airstrips are sources of preservation. It costs the BLM no money to maintain these strips. They are maintained by volunteers and by state funds. Therefore there is no valid reason to close any of the back country airstrips in Utah.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17573-107	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	2.4.21 Travel and Transportation Management (page 2-116) 2.4.21.2 states that motorized aircraft, such as fixed-wing aircraft and helicopters, are managed as OHVs. The DWR uses motorized aircraft, and these tools are essential for wildlife management activities which is not contemplated by the draft RMP. We recommend providing the exception for DWR to utilize motorized aircraft for wildlife-related management activities. We also recommend defining what on or immediately over agency-managed lands and waters and prohibit cross-country travel in BENM means and how that relates to wildlife management activities.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	OHVs are defined in 43 CFR 8340.0-5, and include aircraft when used immediately on or above BLM lands and waters, unless in an excepted category (i.e., emergency or authorized use). Aircraft use by partner agencies may be allowed under authorized administrative use. Refer to the Proposed Plan regarding authorizations available on a case-by-case basis.
1758-1	Bronson MacDonald Daughtry 1045 Laramie Blvd, Unit D Boulder, CO 80304	RAF	Please do not temporarily close these airstrips in the Utah backcountry and only leave two open as the BLM decides what to do. These airstrips are historical features in the west. They have provided backcountry access for Native Americans, environmental researchers, fire prevention, safety measures of helping people out that live remotely to adventurers rafting down the Colorado River to hikers exploring and experiencing the wilderness. These airstrips provide less environmental impact in the wilderness compared to roads being built for 4wheelers. Backcountry pilots practice daily Leave No Trace ethics because we want others to experience clean wilderness areas. These airstrips also provide a safety measure for those flying across the vast, barren lands of the west as a safe place to land. This includes for back country pilots, general aviation pilots, the US Army, Marines, Navy, AirForce, Medvac fixed wing and helicopter pilots. As you decide what to do remember there are thousands of pilots and non-pilots who will volunteer to maintain the upkeep of these remote airstrips. There are many aviation clubs, like RAF, who specialize in restoring and maintaining the up	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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			keep of these airstrips. Work with all of us to keep this open. We will be there to help. Sincerely, Mrs. Bronson MacDonald Daughtry Please dont close: Airstrip Documented Existence Year Browns Rim 1952 Fry Canyon South 1952 Sipapu Bridge 1952 Deer Flat 1954 Dry Fork Canyon1954 Hammond-Kigalia Point 1954 Bluff 1962 Mule Canyon 1962 Red House Spring 1963 Dark Canyon North 1980 Dark Canyon South 1980 Fry Canyon 1980 Long Canyon 1980 Clay Hills Crossing 1987 Lockhart Basin 1987 Lockhart Road 1987 Polly Mesa 2006 Valley of the Gods		
17681-1	Charles Hazekamp		I am writing to urge you to keep all the existing airstrips in the Bears Ears National Monument area open and available to the flying public. In much of this area, the only viable access is via aircraft unless the area is opened to 4x4 vehicles. Aircraft have a much less impact on the environment of the area versus other mechanized vehicles. Aircraft owners that fly into the types of areas are generally very respectful of the natural resources and of the facilities. Pilot organizations such as the Recreational Aircraft Foundation build and support many of these back country facilities. These airstrips also provide a vital lifeline to other users of these recreational areas if emergency services are needed. Aircraft provide the fastest way to provide life-saving services.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
17685-1	David Finamore		I wholeheartedly support protecting Bears Ears area, and I support keeping the existing access by air. Flying in has a very low impact on the land. We fly in, hike, camp, and fly out. No tearing things up in OHVs, destroying crypto crust, causing erosion.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1771-1	Kalan Burkhardt	1st Stop Aviation	Closing backcountry air strips that are currently in use does not support the goals of any individual or group maintaining wilderness areas. Not only do these landing sites provide areas for individuals to go in and enjoy primitive camping as well as hiking and other activities, but also serve as an infrastructure to support those activities in case of emergency or natural disaster. These air strips provide access to the areas with minimal upkeep and environmental impact in comparison to roads and the associated cost and impact of maintaining them.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
1777-1	Patrick Leahy		I hope we can continue access to all the airstrips in Bears Ears National Monument. As an aircrew member for search and rescue and the Civil Air Patrol, we really value these assets for emergencies. Even helicopters benefit from these clear and flat surfaces, and those conditions are only maintained if the airstrips see regular use. Personally, I am a frequent visitor to Bears Ears, and cannot think of a less-damaging vehicle than a lightweight aircraft with smooth, unpowered tires that only touches the ground over a few hundred feet. In summary, light aircraft create the least erosion and damage of any current conveyance (even including pack animals) and are rather essential for search and rescue and aerial firefighting. Keeping the Bears Ears airstrips open offers these benefits with negligible downside.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17974-2	Brad Schuster 601 Pennsylvania Ave NW, 250 Washington, 20004	Aircraft Owners and Pilots Association (AOPA)	As a guiding philosophy, aviators are non-motorized recreationists, participating in hiking, camping and other low-impact activities. The evidence is clear that these users practice Leave No Trace ethics and do in fact leave these airstrips in better condition than when the users first arrived.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17974-3	Brad Schuster 601 Pennsylvania Ave NW, 250 Washington, 20004	Aircraft Owners and Pilots Association (AOPA)	Aviation has a small environmental footprint, the lightest footprint form of access to these lands. Access by air requires NO road, nor infrastructure like bridges or corrals, eliminates miles of dusty road traffic and as these airstrips are situated on natural flat land features, such as level, open meadows, there is little (if any) occurrence of soil disturbance or erosion.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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17974-4	Brad Schuster 601 Pennsylvania Ave NW, 250 Washington, 20004	Aircraft Owners and Pilots Association (AOPA)	AOPA has been seeing an unsettling nationwide trend of federal agencies like the BLM seeking to impose unreasonable and unjustified restrictions and prohibitions on aircraft operations on PUBLIC lands and implore this decision-making body to reject the aircraft-restricting aspects of this RMP as we find actions such as these restricting and/or prohibiting operations on public lands both needless and discriminatory against the aviation community.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17974-5	Brad Schuster 601 Pennsylvania Ave NW, 250 Washington, 20004	Aircraft Owners and Pilots Association (AOPA)	AOPA views proposed restrictions and/or prohibitions to flight at any airport/airstrip anywhere as a threat to the freedom to fly enjoyed by all pilots, particularly as these long-established backcountry airstrips are part of our aviation history and experience. Most Utah backcountry airstrips predate the 1964 Wilderness Act and as such, access and use of these airstrips should be retained.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17974-6	Brad Schuster 601 Pennsylvania Ave NW, 250 Washington, 20004	Aircraft Owners and Pilots Association (AOPA)	Safety is also impacted as fewer strips are available for emergency operations such as firefighting, rescue, or emergency aircraft landings because of an inflight emergency.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
17974-7	Brad Schuster 601 Pennsylvania Ave NW, 250 Washington, 20004	Aircraft Owners and Pilots Association (AOPA)	For many individuals with mobility challenges, access to this pristine region can only be accomplished via air. On July 26, 2024, the Biden administration will recognize the 34th Anniversary of the Americans with Disabilities Act (ADA) where we will again celebrate the inclusion and access promoted by this landmark civil rights law for disabled Americans. Continued access to airstrips like these 18 provides access to many of our fellow citizens that they would not have if it were not for the existence of these airstrips.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.18965-4: The BLM manages motorized recreation act in accordance with applicable law and the Rehabilitation Act.
1799-2	Kevin Deutscher 2222 West Frye Road, Apartment #3018 Chandler, AZ 85224		Specifically the existing backcountry airfields in the area are primarily maintained by volunteer user efforts and should remain part of the public access. Backcountry flying access seems to have the least negative impact on the physical environment as it is isolated and essentially self contained and self maintained. BLM should work with existing backcountry pilots groups as assets to assist in the safe operation and maintenance of the existing airfields. Through those activities it will be possible to establish positive protocols and procedures that benefit all users. The backcountry airfields are true gems within Bears Ears.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
1805-1	Donald Goodman 8 Greene Point Road Bellingham, WA 98229		Our aircraft leave a very small footprint on the land utilizing existing facilities. We require no roads or trails of any kind. These facilities serve an additional function relative to emergency response	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
18330-3	Rose Chilcoat 2914 Junction St Durango, CO 81301		Close Arch Canyon to off-road vehicles. There is no place in this canyon with its rare perennial stream, riparian habitat and many cultural sites for destructive, noisy, polluting and damaging vehicle use. BLM has a legal duty to minimize damage to natural and cultural resources when designating motorized routes and trails. Closing Arch Canyon to motorized use should be a given.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.

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1837-4	William Facinelli		Fourth, close Arch Canyon to off-road vehicles. This will protect the rare stream and the canyon's cultural sites.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18548-2	Melanie		If tribes want access to their special locations, maybe areas can be closed for a week (or more if necessary) at a time to allow them solitude, but don't shut everything down permanently to the rest of the public.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	No area closures are being proposed by this plan.
18556-8	Stan		The BLM should better recognize the historic value of roads more than 50 years old, which were created by pioneers, early settlers, miners, and ranchers. Closing and reclaiming historic roads such as Arch Canyon Road erases a part of history, the same as if a historic cabin or cultural site is vandalized.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Please see the Proposed Plan changes in the recreation section Management Actions By Alternative section in the Recreation and Visitor Services and the Travel and Transportation Management sections in Chapter 2. The agencies appreciate your comment, Arch Canyon is not closed in the Proposed Plan. The agencies are evaluating the effects of the Proposed Plan on historic properties and conducting consultation under Section 106 of the National Historic Preservation Action to determine if any of the management actions in the Proposed Plan have effects on historic properties, including roads.
18560-4	Anna Peterson	The Mountain Pact	We urge you to close Arch Canyon to off road vehicles	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1857-2	Cynthia Muhlestein		The second concern is the travel management. Most troubling would be the closure of Arch Canyon to motorized travel. There are perhaps dozens of roadless areas already in BENM available for hiking, many with extensive archeological resources that outshine Arch Canyon. There are few as beautiful as Arch Canyon with a perfectly great existing OHV road. We recently went to Arch Canyon in side by side vehicles and were able to reach the end of the road, hike to the large arch just past there, enjoy lunch, and travel back in a half day. Due to age and time constraints, we would never experience this by hiking. Closing the road amounts to age discrimination. We saw seven hikers on this trip. They were all within two miles of the bottom of the canyon. They didn't experience the beauty at the top or the ruins either. Very few people ever would under the motorized closure. I feel we have been good stewards of this area. That's why it is in good condition now. Please don't close it.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18687-4	Britt Zale 2093 Nighthawk Lane Moab, UT 84532		1 - It was hard to understand any of the maps provided that show what roads will be closed. Will climbing access roads be closed? The more roads that are closed, the more crowded everywhere else becomes for all activities.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Please see Appendix A for a static map showing each currently designated route and its status within an OHV Limited or OHV Closed area for each alternative or the interactive map on the ePlanning website allowing for the same information to be viewed in detail. Route by route analysis of designated routes would occur through implementation-level planning.
18696-2	Julian Soncco		Close off Arch canyon to OHV use to protect cultural resources.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan allows for motorized use under a permit in Arch Canyon. During implementation level planning agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18696-9	Julian Soncco		ROW allowance causes extensive damage to cultural resources and should be limited heavily as suggested in Alternative E.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	See the Proposed Plan under the Management Actions By Alternative section in the Lands and Realty Section and maps in Appendix A. The majority of BENM is ROW avoidance (meaning the agencies will avoid ROWs in these areas, unless it is not possible to avoid the ROW) or ROW exclusion (meaning the agencies will not allow any ROWs). Additionally, each ROW or SUP application the agencies receive will be analyzed on a case by case basis, and the agencies will complete analysis for to protect BENM objects, which would include cultural resources.
18999-2	Alan Peterson		With so many options already available in Roadless areas, Wilderness Study Areas and inaccessible areas, I have to ask you "Why NOT allow vehicle travel in Arch Canyon?" I recently read your comments (printed in the San Juan Record) pertaining to "potential vandalism' by motorized users. I want to point out that last week while hiking in Mule Canton to House on Fire Ruin I noticed a sign stating that BLM was dealing with vandalism at the site. Are you considering a closure of Mule Canyon to hikers? Have you ever closed an area to ALL human traffic because of vandalism? There seems to be an inherit bias against "motorized" users in management decisions. I would like to point out that ALL visitors are "motorized". ALL users drive to their selected parking lot. The difference is in the opinion about "where" that parking lot should be located. Again, I ask and plead with you to allow that parking lot be at the The Forest Service Boundary. Let the hiking begin there. There's plenty more miles upstream for the healthy & able bodied to venture.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1918-1	Thomas Rollins		We treasure the 16 historic airstrips in the Bears Ears N. M. and request airplane access continue. UBCP (Utah Back Country Pilots) members and others can maintain these airstrips. We will honor and be respectful of Bears Ears N. M.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3128-1	Lanny Toning 949 Montoya Nw Albuquerque, 87104		In my experience, back country airstrips are not used frequently. That said, they offer people who fly the opportunity to more fully realize the incredible grandeur of our national forests and monuments in a way that only flying allows. Closing these infrequently-used but experience-valuable sites to people who often can be called on to support a variety of conservation-related goals seems counter productive. I've heard the argument that the occasional airplane distresses wild animals. And hunting is OK? Four wheelers? Dirt bikes? So, I support keeping the back country strips that have been in use for many decades in the Bears Ear NM open to visits and airplane camping that provides access to the NM that on other way can make possible.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3433-2	Mike McHugh, ID		I am commenting on the BLM's stated intent to close nearly all airstrips in the Bears Ears National Monument. I think these closures would be a travesty, damaging to the entire population of pilots who already have or will enjoy the Naional Monument by flying to the remote locations. From an environmental standpoint, aircraft do far less damage to remote or wilderness areas than hikers, stock riders, bicyclists and UTVs (including the truck pulling the UTV on a trailer.) There is no trail erosion, litter along trails, off-trail damage, or other neglect and rule violations.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3434-1	Jeff M		Please consider this my strong encouragement to keep airstrips open. These airstrips provide important access for both emergency and general aviation activities and there has been consistent studies indicating that these activities have negligible impact from an environmental perspective.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3436-1	Samuel Bishop		Please do not restrict access to airstrips in the Bears Ear National Monument area. When on a cross country trip, we small plane pilots keep an eye out for emergency landing areas. If BLM closes access to those strips, they will deteriorate and become unusable for emergency landings. I have seen exactly that before, where trees and bushes grew up in the middle of the unused, closed strip. Groups like RAF (I am a member) will spend volunteer time keeping those strips useable.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
3440-1	Rob Kelly		I am a backcountry pilot that flies across the US. Backcountry strips are an integral part of the rich history of aviation and freedom in the United States. There is minimal noise impact after takeoff, remote strips are essential for accessing remote recreation activities like hiking and camping not readily accessible by ground, and also for getting emergency services in and injured people out. Please preserve access to the 18 strips inside Bears Ears.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3442-2	Stephen Rapid City, SD		The impact that aircraft have on these areas is negligible, certainly much less than other motorized vehicles that are allowed in these remote areas. A single UTV or dirt bike has substantially more detrimental impact on the terrain than the relatively few airplanes that land on these small and designated landing areas.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3463-1	james yost 2025 prows st placencia, 92870		Public access to public lands should not be restricted by any means that does not damage said lands. Restricting aircraft to Bears Ears Monument airports is not necessary, access in most cases has existed for decades and if these access points are causing problems, they need to be addressed individually and either regulated or controlled at that time.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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					aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
3859-1	Brent Blue		The airstrips in the Bears Tooth area need to remain open for public access by air. Aircraft have minimal impact and allow the American public to enjoy these areas without long drives and wasted energy plus more pollution than aircraft. The impact of closing the Bear Tooth airstrips also reduces emergency landing area.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
3862-1	Gregory McCue 216 Rd 6NS Cody, 82414		Please do not close 16 back country airstrips in Bears Ears National Monument. Most people would agree that these lands should be protected, however the arbitrary closing of 16 points of access that have been in operation for 40-70 years is not helpful to this objective. The public primarily values lands that have some kind of access that they, a member of their family, or a friend has visited or at least dreamed of visiting. Airstrips have the least impact on the environment and the wilderness experience of any other mode of access or multiple use with the exception of foot/horse trails. Airstrips are trailheads in and of themselves allowing enjoyment, discovery and appreciation of these amazing lands. Airstrips do not detract from the wilderness experience in that they are the ultimate "Leave No Trace camping experience. The noise produced is transient and noticeable from any significant distance on takeoff only. They are not heavily used and they reduce the need for dusty, damaging, erosion prone access roads. There are economic advantages to surrounding communities including Native American communities. Aircraft and crews require fuel, food and housing from communities in the surrounding area, These same airstrips, if maintained, provide emergency landing areas for Fire, Search and Rescue, EMS, and general aviation aircraft.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
3866-2	Bob Carter 11024 N 84th St Scottsdale, AZ 85260		To conclude, please do not limit access to the 18 back country airstrips referenced in the RMP that have been in existence and in use for the past 40-70 years. They are not only a recreational asset, but a valuable resource for Land Management, Firefighting, Search & Rescue and Emergency Response.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
4-1			I recommend OHV's be prohibited, except for disabled people and senior citizens. Those 4 wheelers, razrs, and the like are a waste of resources to manufacture and operate. There are also studies that link archaeological resource damage to the operation of the machines. These machines also create a conflict between traditional use like horseback, and walking.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under all action alternatives, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. See the Management Actions by Alternative section of the Travel and Transportation Management section of the Proposed Plan for OHV area designations. See the Cultural Resources and Recreation and Visitor Services sections in Chapter 3 for a discussion of impacts on cultural resources and recreation from travel and transportation action.
503-1	Ut/AZ ATV Club		We believe that the Monument should be managed for multiple uses and that, because much of the area is predominantly accessed by motor vehicles, motorized use should be a top priority when developing a new management plan. There are recommendations to close existing roads in most of the alternatives presented and, by closing routes, you are excluding the majority of people that come to explore and enjoy this area.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. On BLM lands, all areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
5740-4	Roger Jenkins 588 Evening Star Ln, Bozeman, MT 59715 BOZEMAN, 59715		4. Closure of airstrips: I know you are going to get a lot of push back on closing so many airstrips, with the arguments that they provide access to canyon trails, help with search and rescue, etc. But my analysis that, with the exception of the North Dark Canyon airstrip, most of these areas are easily accessed by backcountry roads. For example, the Valley of the Gods airstrip is within a quarter mile of UT 276. The North Dark Canyon airstrip might provide easy access to the upper end of Lean To canyon but most of the other airstrips are just out there. Frankly, airstrips like Polly Mesa would need to have a lot of work done to cut down bushes and trees, and I just dont see people coming in with aircraft accessing places like Water Canyon (the southern-most branch of the several side canyons flowing into lower Grand Gulch. That route was death defying. So I think that closing most of the airstrips, perhaps other than North Dark Canyon, would impact few people. As to the argument that the airstrips are useful for search and rescue, well, it is going to take helicopters to go into the canyon bottoms to pull people out who are injured. Fixed wing aircraft are fine for searching, but for rescue, not so much.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.

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595-2			No new roads should be constructed and existing redundant routes should be closed and reclaimed.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. On BLM lands, all areas not designated OHV closed would be OHV limited. The standard limitation is that travel is limited to designated routes but additional limitations may be applied. There are no OHV open areas within BENM. OHV routes would be analyzed individually through implementation level NEPA analysis. See Appendix H, Travel Management Plan Criteria. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
606-2	John Atkins		While I am in favor of many opportunities for ATVs, I do not think that should include certain places that are environmentally and/or culturally sensitive places. Some of these sensitive places have previously had ATV trails very close to them.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. Proclamation 9558 (incorporated by reference into Proclamation 10285) limits designation of new routes within BENM to those needed public safety or protection of BENM objects. The Proposed Plan does not have any areas designated as OHV open. See the Water Resources, Vegetation, Soil Resources, and Cultural Resources sections in Chapter 3 for a discussion of impacts on the resources provided in the comment from OHV use.
6072-1	Samuel Chambers		I am an active recreational pilot, I frequently fly the deserts of Utah and derive great enjoyment using the various airstrips. It would be a shame to close down any more airstrips. Please keep them open for recreational use. Airstrips provide a great way to enjoy the Utah Desert.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
614-6	Larry Ellertson		My comments is there's some roads that exist and have been there for a long time, and I think we're culturally sensitive not necessarily to the Native Americans but the Mormon people who settled Bluff. Comb Wash is the one that comes to my mind, but it relates to Arch Canyon as well. Anyway, roads that are presently there and recognized as roads should be left open. They need to be designated as open. Like, you can use the term "cherry stem" or whatever it would be, but the existing roads that actually provide access into the area and or passage through the area should be left open and done so in a way that it preserves them, that doesn't do negative things to the monument.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
624-1	Joe Harper 167 MALIBU RD MOORESVILLE, 28117		Lands should be open to the public by all forms of transportation for maximum usage and limited to the smallest parts that contain sensitive historical items. These historical parts should be set up so people can see, learn, and understand what is there and why it's important to protect it. If the BLM and other agencies were a little bolder, they could expand RV and camping or improve and expand facilities and charge equivalent or even premium rates to help finance the accessibility, preservation, and protection of public resources. Not everyone hikes, and not everyone drives a Subaru. Make spaces so that 40 ft+ RV, 6-ft truck trailers, Jeeps, ATVs, and motorcycles can access, enjoy, and reach public lands and places.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. Under the Proposed Plan, new campgrounds may be developed within the Front Country Zone. See the Management Actions By Alternative section in the Recreation and Visitor Services section of Chapter 2 and Appendix E for details on facility development.
639-1	Chance Connelly		The Bears Ears area is important for those of us who responsibly engage in motorized recreation. Driving, camping, etc. in this and other similar areas is what drives us and what bonds our families together. Please Do Not Close Bears Ears to motorized recreation and travel.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
6429-1	Jay Williamson		During my free time I use my airplane to go to remote beautiful places like the Bears Ears Area and use the multiple dirt strips to camp and appreciate the surroundings and celebrate being alive and free. That freedom is threatened my this movement to establish the Bears Ears action plan. My impact with its small sound footprint does not negatively impact the environment yet offers an opportunity to help with SAR, emergency response, and samaritan services. I am a member of the RAF and abide by their good neighbor policy.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
644-1	A Stopka		Air strips are easily closed – please do not close any without first having a complete plan for all of them. Once closed we will have lost them – for 40+ years (60+ years for some of these strips) they have existed giving backcountry access to recreators and emergency services alike. Once they are gone, they are gone. Please implement a long term plan to keep all of these trips open – please do not just plan for two of them, shelving the rest to discuss later. Utah's backcountry deserves all of these trips, and Utah's people deserve a well thought out plan for all of them.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
645-1	Steven Thompson		Please leave all airstrips open. If closed it would severely limit our access to recreational options and probably push us to other states when planning vacation	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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					aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
646-1	Ed Chitwood		I would like to comment on the closing of multiple backcountry airstrips within the Bears Ears National Monument. I very much support keeping this strips open for private, non commercial recreational use. Private aviation is a low impact way to access back country with little cost to the government and the use of already existing strips. No new construction needs to be done. No significant expense should be incurred. People will be allowed to visit backcountry sites (with minimal environmental impact) that would otherwise be off limits. The strips also give search and rescue or firefighting troops an important access portal.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
647-1	Andrew Durbin		I was disheartened to hear of plans to greatly restrict access to long established airstrips in the Bears Ears National Monument. Please do not prohibit landing at these airstrips without an evaluation of the use, benefit, and enviromental impact of each airstrip on an individual basis.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
650-1			Keep 4x4 trails and public land open to the public. Closure is not management. Trails that are currently open need to be accessible for generations to come.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
6531-1	Richard Mayes 22405 WHITE PEAKS DRIVE BEND, OR 97702		Utilizing the existing airstrips within the monument allows us to easily reach remote areas for camping, hiking and exploring. Flying into these remote airstrips does not cause damage to the ground surface, create dust, or place wildlife at risk, and only minimally disturbs other users of the area. I ask that you keep all of the existing airstrips open for public use.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
6560-1	Doug Joslyn		I am writing in concern to the TMP of Bear Ears monument and the proposed closure of Arch Canyon. I went to see for myself the condition and value of this trail. What I found was an exceptionally maintained trail that shows almost no signs of abuse, vandalism or trash. As some that has hiked many of trails in Bear Ears I have seen far more erosion on hiking trails than what is seen here. I do not see or agree that there is an environmental argument for closure. I understand Sacred value to this canyon, however this is not Native American owned land it belongs to the American people for everyone to use not just one group. As for the people pushing for the closure of this trail to off highway vehicles I challenge you to ask how many have actually traveled this area on foot or even at all. I know the answer is very few. I have rarely seen any hikers in the area and only a few horses. OHV is the only practical way to travel this trail. There are hundreds of canyons in ears that do not allow OHV. I would encourage you to reach a decision would allow us to stay open as it is one of the very few to offer for those that cannot or are not interested in all day or multi day hikes. Theres many of wilderness canyons south of Utah 95. Please leave this well respected and wonderfully entertaining trail open.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
6562-1	Joe Yugel 9160 w 64th Ave Arvada, CO; Scott Dunleavy, Sandy Joslyn 640 peppers mill dr Paducah, KY; Linda Adams, Ying Joslyn, Keegan Joslyn Paducah, KY		I would encourage you to reach a decision that would allow Arch Canyon to stay open as it is one of the very few to offer for those that cannot or are not interested in all day or multi day hikes. Theres many of wilderness canyons south of Utah 95 that are permitted and preserved. Please leave this well respected and wonderfully entertaining trail open.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon. The permit system would be developed as part of the BENM Travel Management Plan in the future.
671-1	Steve Phillabaum 2121 W. Denison Rd. Deer Park, WA 99006		Please don't restrict aircraft access to the Bears Ears airstrips. Doing so would only lead to crowding of the remaining strips and loss of access to great recreational opportunities.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

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					on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
689-1			I respectfully ask you to reconsider the BLM plan to close a number of airstrips within the BENM. This is public land that should embrace the freedom to fly that is so unique here in the United States.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
695-1	D S		Please keep the 18 airstrips located within the Bears Ear National Monument open for recreational purposes. I fly a tailwheel aircraft that seats four people. At backcountry airstrips I fly in (with one or two other people) and usually stay for several days primitive camping at or near the airstrip and take day hikes. While I am there primitive camping I am not making any noise. Backcountry access by aircraft does not require much in the way of facilities or infrastructure. In other areas where backcountry airstrips exist, volunteer pilot organizations maintain the airstrips and camping areas. Please keep this access open to these airstrips: Browns Rim, Fry Canyon South, Sipapu Bridge, Deer Flat, Dry Fork Canyon, Hammond-Kigalia Point, Bluff, Mule Canyon, Red House Spring, Dark Canyon North, Dark Canyon South, Fry Canyon, Long Canyon, Clay Hills Crossing, Lockhart Basin, Lockhart Road, Polly Mesa, Valley of the Gods	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
696-1	Sarah Brown		In addition to Bluff Airport and Fry Canyon, access should be provided for the other 16 airstrips by private, non-commercial, fixed wing and rotor wing aircraft for recreational use.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
700-1	Stan Siewert Caldwell, ID 83605		I am in favor of keeping the air strips open and available to use as access points, camping locations, and emergency/search & rescue. Any closure would have negative impact on existing historic users. As a pilot, camper, hiker, kayaker, and photographer, myself and my passengers use and enjoy the access that these airstrips offer. In contrast to some users, I'm not opposed to a well thought out online permitting system. Sometimes airstrips become a goal in itself, a "peak bagging" mindset that is in some areas creates over use and high visitation. I haven't seen this as a problem in Bears Ears, but a permitting system could be considered rather than closures.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
703-1	Matthew Menlove		I am a pilot and I strongly submit a request that the airstrips that exist on the BLM land remain open. It is a critical component to allowing us to use these public lands for one of its intended purposes	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
705-1	Dan Schwinn		There are already organizations including the Recreational Aviation Foundation and the Utah Backcountry Pilots that have been working with the BLM and USFS to provide cooperative maintenance and guidance for pilot that wish to use these resources. Access to all of the back country airfields in the Bear Ears area should be preserved.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
709-1	Deanne Simonsen		These landing strips aren't just a "vacation" spot they are utilized for Search & Rescue missions and probably fire missions. Please do NOT close down these airstrips.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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					aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
711-1	Bruce Nourish		I would like all 18 of the presently-existing airstrips to remain open for the use of non-commercial fixed-wing aircraft. I live in Seattle and own a backcountry-capable aircraft that I use to visit and camp in remote and scenic areas, such as Bears Ears. Closing these strips would negatively impact my ability to visit and enjoy this area. Backcountry airstrips have a light environmental impact and require minimal infrastructure. I hope you will keep them all open.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
712-1	J.D.		Please do not eliminate access to the airstrips in the BENM. As a retired USAF pilot and current airline captain, I can say General Aviation has one of the smallest environmental impacts of any transportation mode, and backcountry flying plays an important roll in developing both military and airline pilots. Restrictions to backcountry flying are increasing everywhere. Public land should be available to all of the public, including GA.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
724-1	George Bacon 1016 Thatcher Way Fort Mill, SC 29715		I just heard that you are considering closing access to several airstrips in the Bears Ear area. I plead that you do not do this. I have a small plane and use these runways on occasion to get to the backcountry for camping and day hiking. I would not be able to access these beautiful and enchanting locations if these airstrips are closed.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
726-1	Jay Carpenter		The BLM is proposing that aircraft only be allowed to take off and land at the Bluff Airport and the Fry Canyon Airstrip, according to RAF officials. By placing this limitation, it serves to essentially close the other 16 airstrips in the BENM, RAF officials said. All 18 of the airstrips have existed and been in use for the past 40 to 70 years and we request that none of them be closed or banned arbitrarily without first evaluating the merits of each. It is a safety concern. Should a pilot find themselves in an emergency, these valuable airstrips could save lives. These airstrips should remain open!	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
729-1	Jeremy B, MN		Please preserve our precious recreational assets and continue to support the Bears Ears National Monument and ensure that ALL the airstrips within its boundaries are accessible to the public. Aviation has a very small environmental footprint, the lightest footprint form of access to these lands and access by air requires NO road, nor infrastructure like bridges or corrals for the public to access.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
729-2	Jeremy B, MN		In addition to Bluff Airport and Fry Canyon, access should be provided for the other 16 airstrips by private, non-commercial, fixed-wing aircraft for recreational use, the same use that has been ongoing for the past 40-70 years. These airstrips are located on natural flat land or open meadows with little occurrence of soil disturbance or erosion.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
735-1	Gregory Mazzola		I strongly support backcountry aviation usage in the Bears Ears Resource Management Plan. I have personally used backcountry airstrips in Bears Ears National Monument to enjoy serene and remote sections of the park. Backcountry pilots have demonstrated great respect and stewardship for Bears	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43

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			Ears: they adhere to "leave no trace" principles and want to preserve the natural beauty of Bears Ears for generations to come. Small, single-engine aircraft are a low-impact way to access public lands: these aircraft need only hundreds of feet of unimproved landing areas, versus miles of OHV trails. Their noise signatures are comparable to a lawnmower and disappear quickly due to the speed of an aircraft.		CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
737-1	Michael Bethea 93 N Club Cabins Way Heber City, UT 84032		We respect the land and the privilege to utilize these airstrips in ways that other visitors to the parks do not. Eliminating their use risks alienating allies to the preservation of these areas. Please reconsider this element within the plan and leave these airstrips accessible to backcountry pilots.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
738-1	Troy Ball		I am a 78 year old, very active pilot. I have been flying the back country strips in Colorado and Utah for many years. I do not have the physical ability to hike to many of the areas in the Bear's Ears proposed national monument but I do have the ability to see parts of that area of the United States if I can fly my airplane to those remote areas. My airplane qualifies as a "light sport aircraft" and the foot print it has on the airspace, the terrain, and the wildlife is not only minimal, it is virtually non-existent. There are countless private airstrips in the west that exemplify exactly what I have stated here. Elk, deer, pheasants, turkeys, and hundreds of other forms of wildlife exist and thrive along side these private airstrips without problems of any kind. Restricting or closing access to the Bear's Ears area actually only accomplishes one thing. It prevents the public from having access to these beautiful parts of our country that many individuals simply can not access any other way. These airstrips have been in use for many, many years and I am absolutely certain that no one can demonstrate, historically, any harm that activity has produced to any wildlife, plants or animals. In fact, organizations such as the Utah Back Country Pilots Association, and others like them, take great pains to make sure that all who operate their aircraft into or out of these remote strips are outstanding stewards of the land. Often, these pilots leave with detritus that has accumulated in these back country areas brought by the general population far removed from these back country areas. As an example, I have often picked up mylar balloons that have drifted on the wind and settled in these areas. Other debris such as paper, plastic, styrofoam or other airborne items can be found in the back country. I and my pilot friends are among the first to find these unwanted items when we visit these back country airstrips and they are removed from the environment. All pilots want to be good stewards of the beautiful country found in the Bear's Ears area. Please consider these thoughts and please do not prevent pilots from having access to this beautiful area.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
739-1	Jacob Brown		I am against any restrictions on the use of aircraft in the proposed bears ears area. As with Alaska and the frank church wilderness, aircraft serve an important role in rescue operations, and if these strips are left unattended, they will become unusable. They are also valuable in getting canyoneers and hikers into remote areas that wouldn't otherwise be accessible. These areas cannot be hiked with the water on your back. The whole purpose of protecting these areas are so that future generations will be able to experience them like we have. By removing aviation, you will be removing that capacity for not only future generations to enjoy, but our own generation. The lands will be inaccessible and ignored. Aircraft noise is short and temporary, and they will already be allowed on over flights. There is no reason for further restriction.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
742-1	James Dobson		The aforementioned RMP illogically restricts access to the Bears Ears NM by the least impactful vehicles and arguably the most respectful citizens. There are 18 airstrips identified by the Department of Interior within the boundary of Bears Ears NM. 16 of these would be closed as a result of this decision. I strongly urge you to reconsider this aspect of the RMP and allow the same access afforded other OHV users.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
743-1	Patrick Romano		The nature of becoming a pilot means we had to pass a federal test and and get updated by local pilot advocacy groups were we can weave in messages about backcountry stewardship and tread lightly principles. Hopefully the airstrips remain open in bears ears, as they are the really low impact trail heads. Thank you for taking the time to consider theses wonderful pieces of aviation inventory.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
744-1	Evan Robinson		There are many strips under consideration, and while I appreciate that the ones I've used most (Fry Canyon) is unlikely to be closed off to us, there are two absolutely critical reasons that the additional 16 strips identified in the Bears Ears NM zone be protected. 1.) Aircraft are the best way to practice LNT. One reason I haven't landed at every strip on this list is that part of responsible aviation is choosing a place to enjoy in the outdoors, and then getting there without causing undue noise or disturbance. I love that we can travel far above earshot of any hikers or animals, never noise polluting for more than a few seconds as we whiz by a 100mph- in stark contrast to the ATVs or other OHVs that often rip around an area for hours before moving on- to then come to a landing and shutdown within about 500' of touching the ground. From there I can access areas that would be really uncomfortable to get to without having a great leg, and I've done it without disturbing anybody or anything. 2) All airstrips are part of a CRITICAL fabric of emergency landing options. The FAA teaches us to maintain safe emergency landing options at all times. When we are up at cruise altitude, having airstrips in all directions (so that we can always land into the wind) and within gliding distance (so that we can land if we lose an engine) is key to making a safe place to aviate, especially in the backcountry when emergency resources can be so far away that the difference between landing on an old airstrip and in a creek might mean life or death. We plan every route to go from airstrip to airstrip, and so even if we don't plan on landing at all of them on each trip, we need them all there to safely navigate to our final destination. I've been forced to land at a small strip due to an incoming snow squall, have had engine issues with oil cooling force a landing as well; once in an ode to Boeing my airplane had a runaway elevator trim and after declaring an emergency, I was counting every second from where I was to the nearest airport. Time was of the essence to safely land with my wife and friends on board. Pilots know that they can take any action necessary in an emergency, but they'll be much more likely to make a precautionary landing, potentially saving life and property, if there is a chartered airstrip beneath them than if they know there's an old closed strip in unknown condition that they might get in trouble landing on. Wish that weren't he case, but it's a simple human psychology battle that we dont' want to put anybody in - keeping strips open will keep more folks alive.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
750-1	Mark Brown		As an avid backcountry aviator, I believe it is crucial to preserve and protect our historic backcountry aviation airstrips for current and future generations. First and foremost, backcountry aviation provides unparalleled access to our public lands. These established airstrips, some of which have been in use since the 1950s, allow for non-intrusive exploration and enjoyment of the natural beauty of Bears Ears. Unlike other forms of access that require extensive road maintenance and development, airstrips utilize existing infrastructure, minimizing environmental impact. One key aspect that must be emphasized is the limited noise signature of aircraft during takeoff and landing. Unlike continuous noise sources such as highways or industrial activities, aircraft noise is transient and has minimal impact on the surrounding environment and wildlife. In fact, in over 70 years, there have been no documented noise complaints from backcountry aviators in the Bears Ears region. Furthermore, airstrips play a crucial role in providing access for emergency services such as fire fighting, rescue operations, and medical evacuation. Denying access to these airstrips could hinder critical response times and jeopardize safety in remote areas. Additionally, these airstrips serve as safe landing points for transient pilots in case of emergencies, contributing to overall aviation safety in the region. I also want to highlight the collaborative efforts between the Utah Backcountry Pilots (UBCP) and local BLM officials in managing and maintaining these airstrips responsibly. The UBCP's commitment to "Leave no Trace" principles and responsible use practices underscores our dedication to preserving the natural and cultural heritage of Utah's public lands. In conclusion, I urge the BLM to reconsider the restrictions outlined in the draft RMP that limit aircraft access to only a few designated airstrips. By recognizing the historical significance of these airstrips and acknowledging the minimal impact of aviation on the overall user experience in Bears Ears, we can ensure that future generations of aviators and outdoor enthusiasts can continue to enjoy and appreciate this unique landscape.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
751-1	Jack Horn 130 Cessna Dr Erie, 80516		As a 72 yr old that has been paying taxes since I was 15; I now am using/enjoying BLM/public lands more. I can and do fly from my home is eastern Colo to Idaho, and northwest every year to enjoy the mountains and are way more accesible than the higher mountains in CO. Ebiking is another excellent want for me to use the backcountry; electric biking got me back in to biking. One way for me to access is my small airplane that will get me into these locations; BTW, I also have an artificial hip and shoulder. My airplane is way quieter than many other recreational vehicles and leaves almost no environmental footprint. Along with private pilots using many backcountry strips rafters, hikers, hunters and many more are ferried to backcountry locations via commercial aircraft. Plus, medical extractions happen regularly. Any and all backcountry strips should definitely be kept open for all of the above users.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
761-1	Kyle Hash		In regards to closure of airstrips by the BLM; I find the act in violation of the the BLMs main purpose, to provide access and maintain freedoms for the public to use and enjoy our public land. Closing airstrips limits use and could potentially increase more harmful route usage of vehicles, pack	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			animals, and pedestrian. GA aircraft are transient in nature and the noise they produce isnt as bothersome as many other forms of transportation. I feel that closure of back country airstrips could also hinder search and rescue services as well patient transport. I am against closure of public land access.		CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
762-1	Colby Barrett		Please don't close any airstrips in the national monument. They are critical for backcountry aviation and safety.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
768-1			Keep vehicles out of Arch Canyon Thanks for the chance to comment on your draft EIS for your monument management plan. Of the many conflicts you must resolve, Arch canyons stream erosion must be among the sharpest and most prominent. As background, historically the Perkins family diverted part of the lower creek and ran cattle up the canyon. The subsequent grazing and trampling damaged the original perennial stream and its riparian border. Only when the damage became well known did BLM exclude cattle, and then only upon a court order. Nevertheless, BLM continued to allow vehicles to further degrade the stream and its channel by way of designating it as an official OHV route. Today, hundreds of vehicles annually drive up the canyon, eroding the stream channel. The cars have excavated as deep as one to two meters in places, irreparable harm for the creek and habitat. One reason the BLMs sponsored damage is important is that Arch creek is home to leopard frogs and thousands of fish	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon in a manner that protects Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future.
770-1	Mathieu Labs W7343 Spring Valley Drive Greenville, 54942		Allowing general aviation (GA) aircraft for private, non-commercial purposes is crucial for safeguarding the integrity of the National Monument's objects and values. Moreover, beyond just Bluff Airport and Fry Canyon, access ought to be extended to the remaining 16 airstrips for recreational purposes, exclusively for private, non-commercial fixed-wing aircraft, maintaining the same usage patterns observed over the past four to seven decades. These established airstrips serve as recreational assets, facilitating dispersed primitive camping, particularly as there's a rise in backcountry exploration through "boondocking" road vehicles. Aviation boasts an exceptionally minimal environmental impact, representing the most eco-friendly means of accessing these lands. Furthermore, air access necessitates no construction of roads, bridges, or corrals. By opting for air travel, the congestion and dust pollution associated with lengthy road journeys are altogether bypassed. Most of Utah's backcountry airstrips precede the enactment of the 1964 Wilderness Act, underscoring the importance of preserving access to and utilization of these airstrips. Any noise generated by aircraft is brief and temporary in nature, ensuring minimal disruption to the surrounding environment.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
773-1	Ron Logan GLENDALE, CA 91206		Please reconsider the closing of the backcountry airstrips in BENM. These airstrips have been in use for decades, many since the 1950s, and have had no adverse effects on the wildlife or environment in BENM during this time. It seems very arbitrary to close them and limit access to the interior of the Monument. These airstrips provide an extremely low impact mode of access compared to building roads. They are a treasured resource to the backcountry flying community, who are extremely conscientious protectors of the area around these strips. The strips also can provide for emergency access that would be lost with their closure. They are a valuable resource and it seems wasteful of taxpayer money to close them lose this access when they are working so well now.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
782-1			The airstrips within the bears ears national monument need to remain open for public access and recreation use. This allows greater access to the area for fire and search and rescue efforts and for personal use and enjoyment of all aviators. This causes no damage to the land or environment.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
802-1	Jin Cui		The preservation of BLM airstrips should be preserved! Many of these have been here for decades and the environmental footprint is very small relatively to automotive based tourism.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
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805-1	Steven Davis		The extended historical use of the back country airstrips in and near the present Bears Ears National Monument should support their continued use and maintenance barring any degradation that would present safety hazards. National Monuments typically allow extensive motorized road access, and light aircraft access should be viewed no differently.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
814-1	Brent Rowser Draper, UT 84020		I'm requesting the RMP include aviation as an appropriate use of public lands and keep the existing backcountry airstrips open to aviation use. I frequently visit the airstrips in this area, which I use as trailheads to the backcountry. I frequently take my dad along, who, due to age and other health issues, can no longer visit remote areas as easily as he once could.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
815-1	Neal Schwieterman PO Box 1124 Paonia, CO 81428		I believe that these 18 strips all predate the Wilderness Act and all have been in continuous use since the 1950's. I appreciate the keeping Bluff and Fry open, but suggest that closing the others until they can be evaluated is rather punitive. As an alternative, I suggest that all 18 be left open until such time that they can be evaluated. This would fit the historic and existing use pattern. Studies have show that infrequent small plane use is amongst the smallest humans travel footprint for nearby wildlife. My plane, with both a take off and landing, is a MUCH smaller footprint and driving our 4X4 Exterra for miles trying to arrive at the same location. This information coupled with the fact the the Recreation Aviation Foundation and Utah Back Country Pilots Association are willing partners to assist Public Land Agencies in maintaining these public access points makes keeping all 18 strips open a win-win for the agency as well as the flying public. Thank you for your time.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
818-1	Andy Deeds 15250 Arfsten Road Larkspur, 80118		backcountry airstrips have served not only the public, but first responders fighting fires and accomplishing rescue operations. Since 2010, my family and I have learned to enjoy the access to these airstrips in Utah, Colorado, Idaho, Montana, and Arizona. Lower impact and intrusive operations in and out area such as the Bears Ears Wilderness Area just to name one area are hallmarks of the experience.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8-2	John Beaver 715 Rhode Island Street Helena, 59601		OHV. I would more clearly define what constitutes a "road" for OHV use. I really have no problem with OHVs on main roads or obvious two-tracks that can be accessed with a typical ranch or wood truck. But the articulated, suspended high-end OHV that basically go straight up the rock have no business being there, even if there is a faint track that they can say they're following. This needs to be better signed and patrolled.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	OHVs are defined in 43 CFR 8340 and are provided in the document. OHV does not refer to a specific type of vehicle, such as an ATV or a side-by-side, but instead can refer to various types of motorized vehicles when on or immediately above public lands or waters and when not in excepted categories such as authorized or emergency use.
829-1	Allen Haygood		There are many Roads and Back Country Airstrips that have existed for a long time. None of these roads or airstrip should be closed...I may choose to walk, bike, paddle, drive or fly into this area. It should be managed to accommodate ALL forms of transportation.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
838-1	Wendy Lessig	Recreational Aviation Foundation	Backcountry aviation might be a very small slice of the overall recreational opportunities available in the BENM, but it offers valuable resources that benefit the BENM and help protect the monument objects and values. Thank you for including aviation in the Bears Ears NM (BENM) draft RMP. Airstrips are a benefit and add value to the BENM. I request that the BLM consider the benefits that airstrips add to the BENM in deciding among the various management alternatives for the BENM.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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838-2	Wendy Lessig	Recreational Aviation Foundation	According to the 2020 emissions inventory on Table 3-64 in the BENM draft RMP, fugitive dust from unpaved roads accounted for 70-75% of the fugitive dust in San Juan and Garfield Counties, respectively. In the BENM draft RMP Travel, Transportation and Access Management, Section 3.5.8.1, Affected Environment, it states that there are 1,364 miles of BLM motorized routes and 476 miles of NFS motorized routes, for a total of 1,840 miles of unpaved roads within the BENM. In the scenic resources section of the BENM draft RMP, it states that windblown fugitive dust can adversely affect visibility and negatively impact the highly valued visual resources in the BENM. The combined length of the 18 airstrips in the BENM, including the paved Bluff Airport and unpaved Fry Canyon Airstrip is less than 10 miles. An aircraft might roll 500 ft to 1,000 ft during either takeoff or landing. Aircraft can access remote areas for recreation without creating fugitive dust all along hundreds of miles of dusty roads. Aircraft create far less fugitive dust than other land-based OHVs, not only because there are far fewer aircraft, but the dust per vehicle is only a tiny fraction per aircraft than per other OHVs. The BENM draft RMP has not acknowledged that the 18 airstrips in the BENM are assets and that they provide benefit to the BENM and protection to its objects and values with respect to reducing fugitive dust. Private, non-commercial, fixed-wing aircraft provide some limited relief from overall fugitive dust and concurrent protection of visual resources by reducing the number of OHVs that travel down the hundreds of miles of dusty roads to access remote areas of the BENM for recreation. I suggest that the description of this benefit could be added to the BENM draft RMP in the environmental consequences section and considered when choosing among the various BENM management alternatives with respect to aviation.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8427-1	John McCardle		I would like to request that Utah's backcountry strips remain open for public use. The footprint of aviation is very small only effecting a thousand feet or so of runway. The US is unique in the world in the freedom it grants to citizens when it comes to flying and I believe that should be something we preserve. It is also a way to bring tourism to Utah, being from NE I would like to visit the state and fly into these backcountry areas.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8428-1	Sean Pool		Its my opinion that aviation should be exempt from any new rules. Back country aviation is a way to recreate with little environmental impact. Keep in mind these planes touch down and roll short distances before taking back off. Usually they cruise well above any altitude that would disturb wildlife from noise. BLM land is some of our only land to enjoy off airport landings. This change would close so many valuable back country strips that allow for aviators to access the backcountry. Additionally these strips help aircraft access other land users who may need urgent help. We need to expand areas where these things are allowed, not remove over a million acres.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8429-1	David Palmer		As an avid supporter of responsible aviation and its role in accessing public lands, I believe the proposed restrictions in the draft RMP are unjustly limiting for aircraft. Aircraft have a minimal noise signature compared to many ground-based OHVs and leave no lasting impact on the landscape, making them an environmentally friendly option for accessing remote areas. The ability to use multiple airstrips is crucial not only for recreational purposes but also for providing emergency access and support to other outdoor enthusiasts. Limiting aircraft to only Bluff Airport and Fry Canyon Airstrip unfairly restricts our access and does not align with the principles of equal recreational opportunities for all users of public lands. I urge the BLM to reconsider these restrictions and maintain the accessibility of the other 16 airstrips within Bears Ears National Monument.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8430-1	Kerry LaFleur		Aircraft should not be excluded from public lands. They have minimal impact and are vital to the taxpayers enjoyment of public land provide utility otherwise unavailable to many areas.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8431-1	Nicholas Koukoutsakis		I'm writing in regards to the Resource Management Plan for the Bears Ears National Monument as it pertains to backcountry airstrips. I believe that it is worthwhile to maintain access to all these both for recreation and safety. Airstrips allow people to access and enjoy the most wild places in a manner that is in herently low impact. They also provide essential tools for emergency services. I fly a research aircraft for the USGS and often find myself in remote areas and am always thankful when I see dirt strips in the backcountry because often they are the only safe place pt land in case of an	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

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			emergency. I also spent many years in doing SAR for the national park service and find backcountry airstips to be an irreplaceable too when seconds count.		on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
8433-1	Chris Menno		These airstrips should remain accessible as aircraft are less disruptive to the area as they are limited to the few hundred feet of the airstrip itself where ATVs, mountain bikes and even hikers wear about the soils and plant materials for much greater distances which can lead to different erosion scenarios with wind and rains. The sound is momentary and not a constant and again, confined to specific areas of the airfields only.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8436-1	Scott Schmidt Draper, UT 84020		Please keep the airstrips open in Bears Ears as they are vital for so many positive reasons. We use these strips to deliver goods and interact with the locals. I have been a pilot for over 30 years and love exploring Utah and raising my two girls (12 and 14) camping at our backcountry airstrips. Not only do I think we should keep them open we need add more and stop the trend we are seeing in Utah. As a native Utahn, it disturbs me to see the closure of the trails and campgrounds when we need to do the opposite. As backcountry flying and outdoor activities expand, we need to expand the trails so we don't overcrowd the open areas. Use people like myself and organizations to maintain/adopt the trails so we don't close them anymore. There has never been a noise complaint and technology is getting even better. The new electric planes are getting quieter and quieter.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8444-1	Jim Huntington 7601 Dubonnet Way Indianapolis, IN 46278		I am against closing backcountry airstrips. The pilots that use these do not impact the environment and good stewards of the land. Private aircraft can be an asset when emergencies arise for search and rescue. Please continue to allow private aircraft to utilize all the existing airstrips.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
846-1	Stephen O'Connor		I make frequent cross country trips over the area and enjoy being able to have extra peace of mind with nearby airfields being available. In addition, I always make an effort to stop and and visit these airstrips, mainly to enjoy the beautiful scenery and outdoors. Please refrain from shutting down any airstrips. They are a very valuable asset to pilots like me.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
850-1	Mark Stroud 364 E 5th Ave Durango, CO 81301		Hello, I am reaching out to express my concerns regarding the potential shutdown of the backcountry airstrips within the Bears Ears National Monument (BENM). As an avid supporter of public lands and a proponent for the establishment of the Monument, I believe closing these historic airstrips would be a significant error. These airstrips should be viewed as an asset to the Monument rather than a detriment. They offer substantial recreational value and some have been operational since the 1950s, such as Browns Rim, established in 1952. My visits to the BENM are often conducted by air; we land, camp with minimal impact, and depart. This method provides an excellent means of accessing the backcountry with negligible impact. Consider the following points: - Aircraft and aviation leave a very small environmental footprint, in fact, they have the least impact compared to any other form of surface access, including cars, trucks, bikes, and horses. - Air access does not require the maintenance of roads or cause miles of dusty travel. - General aviation (GA) offers a private, non-commercial method to access the backcountry, which is increasingly important as more campers flock to Southeast Utah for "boondocking."	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8506-1	Warren Dobson		As a general aviation pilot of 36 years, I feel compelled to comment on the possible closure of any backcountry airstrips in Utah's Bears Ears National Monument as indicated by the current proposed BLM RMP. The majority of my backcountry flying has been in Alaska, and I know well the value of remote backcountry airstrips beyond the access for recreating or hunting and fishing. Probably the most compelling reason to retain usage of Utah's backcountry airstrips is for safety. The remoteness and rugged terrain in the Bears Ears make emergency landing of light aircraft challenging to say the least. The availability of these remote airstrips for general aviation aircraft is priceless and could result in saving lives. These remote airstrips also provide quick access for medical evacuations in difficult terrain, as well as bases for fire fighting if needed. Finally, my wife and I have recreated in the Bears Ears NM area for over 15 years. We have never been encumbered or bothered by the presence	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			of general aviation aircraft on the remote airstrips. I see no benefit to removing these airstrips from public usage and several possible significant downsides. I urge you to leave these backcountry airstrips open. Thanks for the opportunity to share comments.		
8512-1	Trevor Aldridge 115 SE G Ct Bentonville, AR 72712		Backcountry aviation is a unique and iconic aspect of American freedom, offering unparalleled access to remote and pristine areas. These airstrips, often unseen and minimally impactful, have a long history of providing critical access for pilots, conservationists, and emergency responders. Removing these airstrips would not only diminish the freedoms we hold dear but also restrict access to the very landscapes that the BLM seeks to protect and manage. Backcountry airstrips have been part of the American aviation landscape for decades. These airstrips were established to enable access to remote areas for purposes such as surveying, firefighting, medical evacuations, and conservation efforts. They are a testament to the pioneering spirit of early aviators and continue to be vital for contemporary pilots who seek to explore and appreciate our nation's natural beauty. Preserving these airstrips is crucial for maintaining a connection to our cultural heritage. They serve as living reminders of the history of aviation and its role in the exploration and stewardship of our public lands. Removing them would sever this link to our past and undermine the efforts of countless individuals who have worked to keep these airstrips operational and accessible. Contrary to concerns about environmental impact, backcountry airstrips have a negligible footprint. These airstrips typically require minimal infrastructure and maintenance, resulting in a low environmental impact compared to other forms of access such as roads or trails. Pilots who utilize these airstrips are highly aware of the need to protect the environment and adhere to strict guidelines to minimize their impact on the landscape. The presence of these airstrips can actually aid in conservation efforts. They provide access for scientists, researchers, and conservationists who work to study and protect the delicate ecosystems within Bears Ears National Monument. By facilitating their work, these airstrips play a crucial role in the ongoing efforts to preserve and understand these natural environments. Backcountry airstrips contribute significantly to the local economy by attracting aviation enthusiasts, tourists, and outdoor adventurers. Pilots who fly into these remote areas often spend money on fuel, supplies, lodging, and other services in nearby communities, providing a vital economic boost to these regions. Additionally, the unique experience of backcountry flying attracts tourists from around the world, further enhancing the economic benefits. Backcountry airstrips play a critical role in ensuring safety and facilitating emergency response in remote areas. They provide vital access points for search and rescue operations, medical evacuations, and firefighting efforts. Removing these airstrips would significantly hinder the ability of emergency responders to quickly and effectively reach individuals in need. The existence of these airstrips also enhances the overall safety of aviation in remote areas. In the event of an in-flight emergency, having a network of accessible airstrips can be the difference between life and death for pilots and passengers.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8538-1	James Ott 10037 SE Eastview Dr. Happy Valley, OR 97086		Please keep these 16 backcountry airstrips open to the public. They are well used and enjoyed by many of the flying public. As should be obvious to all, usage of these strips has the most minimally invasive footprint of any other form of access.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
859-1	Randy Owen 327 Dakota Circle Grand Junction, CO 81507		These airstrips provide low environmental impact access to the wonderful Please include landing access to these wonderful old airstrips in your RMP camping, hiking and enjoyment of this public land.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8625-1	Daniel Groves		The availability of backcountry aviation access is something that is fairly limited to western states. It is a unique privilege and experience that is not seen in many other parts of the country to the same extent, and limiting one of the greatest states in this sense would impact the growth and future of the backcountry aviation community in future generations. Backcountry aviators are public land stewards who strive to promote safe and sustainable access to pare as that cant be accessed by many other means of transportation. This, along with the safety concerns of closing airstrips that could be used as emergency alternatives, is why I humbly ask that we reconsider the idea of revoking aircraft operation rights at the proposed locations in the Bears Ears national monument.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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8649-1	Craig Benson		I am writing to express my concerns about the access changes to the existing use of airstrips within the proposed Bears Ears National Monument. I am adamantly opposed to any attempt by the BLM to restrict access to public lands but this proposal specifically targets an established, historically significant, and low impact use case which is back country aviation. These airstrips provide access for dispersed camping and low impact use of our public lands. In addition, the search and rescue operations conducted out of these airstrips by volunteers have proven critical to public safety over the years. I have been an active user of public lands, especially those administered for the public by the BLM. After 45 years of working and dreaming I have finally been able to afford my own airplane and look forward to seeing the vast Western landscapes by air. This proposal arbitrarily limits access to aircraft while simultaneously allowing access from other motorists and OHV users. I believe this is an arbitrary and capricious decision not supported by precedent of fact. One only has to study the use case of aviation within the Frank Church wilderness of Idaho to see that backcountry aviation has an extremely limited impact on the landscape and is a valid means of public access to OUR lands. In closing, I believe that the existing airstrips within the proposed monument site should be allowed to remain active and in use according to historical precedent. The actual footprint on the land is minimal compared to any other motorized uses. There is little evidence that closing these strips will provide any benefit to other users while evidence exists in many cases that aviation provides great safety benefits in the event of wildfire, emergency medical evacuation, and search and rescue operations. There is very a limited fiscal impact to allowing these airstrips to remain active as volunteers have traditionally maintained these resources. Remember, you have be tasked with MANAGEMENT of public lands for ALL users. Restriction, prohibition, and exclusion of use are not tools at your disposal in efforts to actively manage our public lands.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
865-1	Wendy Lessig	Recreational Aviation Foundation	I offer the following comment regarding aircraft as OHVs and request that the BLM manage all OHVs, including aircraft, by the same set of rules. In the BENM draft RMP Travel and Transportation Management, section 2.4.21.2, Management Actions Common to All Alternatives, it states that motorized aircraft are managed as Off Highway Vehicles (OHV) as per 43 CFR 8340. In Appendix H, Section 1, it states that Travel Management Plan decisions regarding OHVs would be consistent with the BLMs national OHV strategy. The proposed restriction in the BENM draft RMP to allow aircraft to only land at Bluff Airport and Fry Canyon Airstrip seems to conflict with the national BLM strategy to manage aircraft as OHVs, namely that OHVs, including aircraft, are allowed to use designated OHV routes that are open or limited. Many of the airstrips in the BENM are on or partly on designated OHV routes (dirt roads). The proposed restriction for aircraft to only be allowed to take off or land at the two named airport/airstrips would seem to inadvertently prohibit the existing airstrips from being used. On BLM lands across the country, aircraft are allowed to land on designated OHV routes, since aircraft are considered OHVs. As a pilot, I have appreciated the ability to legally land on BLM roads. Although not often, I have landed on a BLM road for a comfort break when flying between distant airports, to check on an unusual vibration on the plane, to secure a loose latch or seatbelt, or any other number of non-life threatening non-emergency reasons. Many OHV routes are not particularly suitable for aircraft takeoffs and landings if they are not straight, too rough, not long enough, have graded berms close-in on the sides, or have OHV traffic on them, so it is not expected that aircraft will regularly use motorized routes in the BENM for takeoffs and landings, but more as an exception to landing at an airstrip. It is the pilots responsibility to determine that a landing area is safe for landing and takeoff. It is requested that the BENM draft RMP be clarified such that aircraft, which are OHVs, not be prohibited from using OHV routes that are open or limited and that aircraft be allowed access commensurate with other land-based OHVs. It is requested that the BLM clarify which specific types of aircraft are restricted to takeoff and landing only at Bluff Airport and Fry Canyon Airstrip. A clarification that allows private, non-commercial, fixed-wing aircraft to use the 18 existing airstrips (including Bluff Airport and Fry Canyon Airstrip) for recreational purposes would be suitable to allow the airstrips to continue to be used as they have been for the past 40-70 years. It is requested that the BLM not close any of the 18 existing historic airstrips in the BENM without first evaluating the merits of each one, which is most appropriately done in the implementation-level Travel Management Plan process. It is requested also that private, non-commercial, fixed-wing aircraft be allowed to use and operate on the designated motorized OHV routes, in the same manner as other ground-based OHVs.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. OHVs are defined in 43 CFR 8340, and include motorized aircraft when not in one of the excepted categories (i.e., emergency use, authorized use).
866-4	Wendy Lessig	Recreational Aviation Foundation	Please keep the 18 airstrips in the Bears Ears NM open for recreational use by private, non-commercial, fixed-wing aircraft so they can continue to be enjoyed by aviators now and for generations to come.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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8672-1	Cory		Please dont take away our backcountry airstrips. I dont have a recreational vehicle, and the airstrips is the way I access this public land. The air strips are already there and aircraft are far less damaging than recreational vehicles. Its our land and we should be able to have access to it not restricted	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8688-1	Shawn Jordan 30907 N. 138th ST Scottsdale, AZ 85262		I can absolutely without a doubt say landing aircraft in the back country has the least impact to land, vegetation and wildlife of any human use. Along with nearly no impact, as a whole back country pilots I have found have had the most respect for the land and truly leave without a trace. Off road vehicles and even mountain bikes make lots of noise traversing in and out of the back country, where as aircraft only make some brief noise for 30-45sec on take off and then are gone. Aviation is a truly a special thing, combining that with the absolute beauty of Utah and you having something magical. Please keep aviation use open in the Bears Ears National Monument and allow the next generation of future pilots to enjoy the Utah back country.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8690-1	Doug Zook		Please keep these airstrips open. Lower impact than UTV. Important multiple use.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8706-1	Max Rollins 1680 Madagascar Street Costa Mesa, 92626		You may be unfamiliar with backcountry aviation, as was I just a few years ago, but I want to assure you that this is one of the least intrusive and destructive ways to explore our country. The aviation community is wholly supportive of the concept of "Leave No Trace," and many of us leave the land in a better condition than we found it. As aviators, we do not destruct the environment; we are often limited to the air and most often land on pre-designated landing areas. Our exploration is largely aerial, causing zero impact to the ground environment, or by foot, which is the least intrusive method of exploration. While the majority of pilots adhere to these principles, the remaining group goes above and beyond to clean up areas, often addressing disturbances caused by non-pilots. While there may be exceptions, disrespectful pilots are certainly in the minority. In addition to our minimally intrusive method of exploration, backcountry aviation provides me and my family with unique and beautiful experiences in some of the most pristine parts of our country. Spending time in the backcountry wilderness, where the stars shine the brightest and wildlife thrives freely, is one of the most special adventures one can have. Over the past 70 years, there have been zero noise complaints related to our aviation activities. Moreover, having a group of charitable pilots who help maintain these airstrips ensures that there are safe places for emergency personnel to access when needed. If additional resources are required to maintain these airstrips, please let us know, as we are more than willing to assist! I ask you to reconsider the proposed limitations on backcountry aviation in Bears Ears National Monument. This restriction would significantly impact one of the most unique methods of exploration and adventure.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8713-1			Unlike 4 wheel vehicles our footprint is small and with our non-treaded bush tires the tracks are basically non-existent. I know noise is a concern but our airplanes arent very noisy compared to 4 wheeled vehicles plus we are transient so if there is noise its not for very long. I dont live in Utah but I work there and I have always been envious of your BLM airstrips and the relationship with pilots. What a blueprint for how public lands should be used and operated! Allowing all citizens access. Plus airplanes provide unique benefits. We can help with fire spotting and search and rescue. Please consider keeping the Bears Ears strips open. They are historical landmarks and aviation has had a minimal impact to other land users.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8716-1			I believe all lading strips should stay open. The aircraft make very little environmental impact to the land and creat opportunities to enjoy the nature.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

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					on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8720-1	Connor Cawthorn		It's crucial to acknowledge the substantive benefits of backcountry aviation. Unlike traditional camping, which often necessitates extensive road maintenance, airstrips require only the land already designated for their use. This not only minimizes environmental impact but also alleviates pressure on dispersed camping sites, which are increasingly scarce. Addressing concerns about noise, it's important to recognize the fleeting nature of aircraft sound during takeoff and landing. Our presence harmonizes with the natural soundscape of Bears Ears, leaving little to no disruption for fellow visitors. Moreover, airstrips serve a vital role for all users of Bears Ears. They provide essential access for firefighting, rescue operations, and ambulatory services. Our approach to aircraft access is founded on cooperation and collaboration. For over 26 years, the UBCP has worked closely with local BLM officials to safeguard the integrity of our state's historic backcountry airstrips. Together, we've strived to ensure these airstrips are recognized and integrated into resource management plans. Closing all airstrips except 2 is an unacceptable solution to the environmental pressures facing BENM. By closing the other airstrips, traffic will be concentrated to these 2 locations, greatly increasing the localized sound/ground impact as well the likelihood of mid-air collisions and aircraft related injuries.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8729-1	Manuel Estrada		Hopefuuly you'll allow continued back country aircraft access to all existing Utah strips. You won't find more careful and conscientious stewards of our beautiful lands than us back country pilots. We are ever ready to lend a hand in search & rescue; and these strips are invaluable for that.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8730-1	Jeremy Bingham 1803 S 400 west Oakley, ID 83346		Aviation strips are vital for the backcountry. They should not be lumped together with OHV . You need to address this in the plan to keep all airstrips open or litigation is eminent.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.OHVs are defined in 43 CFR 8340, and include motorized aircraft when not in one of the excepted categories (i.e., emergency use, authorized use).
8749-1	James Shaw James Shaw, 24586 Gliderport Rd. Loranger, LA 70446		I wish to see no backcountry airstrips closed in Utah. Small private aircraft are minimally invasive to the environment, much less than other forms of motorized transportation. The STOL type aircraft that use these airstrips only need several hundred feet to operate from, whereas ATV type quads cover many miles in a day having a much larger impact on the environment. Keeping these airstrips open to the flying public is very important to me and many other pilots throughout the country.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8756-1	Cory Robin		Noise Impact: The transient nature of aircraft noise during takeoff and landing, lasting mere moments, has a minimal impact on the soundscape of Bears Ears. Over the past 70 years, there have been no noise complaints from backcountry aviators. This indicates that responsible aviation practices do not disturb the peace and solitude sought by other visitors. Access and Safety: Airstrips serve crucial roles beyond recreation. They provide access for firefighting, rescue, and emergency services, ensuring safety for all visitors. In addition, these airstrips offer safe landing options for transient pilots in case of precautionary or emergency landings. Further, as a volunteer pilot for Air Response Foundation, we often utilize these airstrips in critical backcountry life saving operations. Equitable Access: Categorizing aircraft as Off Highway Vehicles (OHV) and restricting their landings to Bluff Airport and Fry Canyon Airstrip denies aviators the same recreational opportunities afforded to other OHVs. This limitation unfairly restricts our access to public lands, which is vital for those with physical challenges or preferences for air travel. Historical and Collaborative Efforts: For over 26 years, the Utah Back Country Pilots (UBCP) have collaborated with the BLM to manage and maintain these historic airstrips. Our cooperative efforts have ensured that these sites remain preserved and minimally impactful to other land users. Recognizing and including these airstrips in the final RMP and future Travel Management Plans will honor this long-standing relationship and preserve Utahs rich backcountry aviation history. Request for Action I urge the BLM to reconsider the proposed restrictions on aircraft landings within the Bears Ears National Monument. Allowing access to the	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.

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			additional 16 airstrips identified by the UBCP will ensure that aviation enthusiasts can continue to enjoy and protect these lands responsibly.		
8759-1	Sean Kelly Bozeman, MT 59718		Please reconsider this proposal to list aircraft as OHVs. Aircraft historically have been allowed to access many areas in the U.S that are extremely difficult to access in any other way. They have very limited impact on vegetation and fauna as they are not motorized through the transfer of power to wheels, just power into the air. Aviation as a whole in this nation is a dying and ever shrinking subset of people and business. Fortunately back country aviation has recently brought many people into aviation that would have otherwise never joined. These individuals then utilize airports in many locations, bringing much needed revenue and jobs into local economies. Also, modest increases in flight volume at airports can go Along way to benefitting states as they become eligible to receive FAA federal funding. Additionally many of these individuals that get into aviation are the same people that end up pursuing aviation as a career. This is critically important to leave this avenue of job growth open as there is already serious pilot shortages in this country. These shortages impact commercial aviation, air medical, aerial fire fighting, angricultural aviation, etc. please dont remove the little incentive to becoming a pilot. The nation needs more pilots! Although potentially limiting just one area may seem like it may have little impact, I can assure you it has far reaching consequences. The trickle down effects of policy can have impactful and meaningful negative change in other areas as well. In short, I believe the operation of aircraft and the risk to nature is exceptionally low, the risk and hazard to others on the ground is magnitudes lower than typical OHVs, and noise from aircraft is normally short lived and quickly dissipates as the aircraft travel faster and further than standard OHVs. Please reconsider this ban, it does not benefit the public in any meaningful way, it does not cost the government money to allow aircraft to operate, and it does not present as a risk to people.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8762-1	Jonathan Fay		It appears that that language of this rule would close a significant number of backcountry airstrips to aircraft traffic. Aircraft, especially back country aircraft, have a very small footprint, the smallest of any vehicle to the land. ATV's, cycles, cars and even hikers all cause wear going in and out to back country areas. Aircraft don't disturbe the land on the way in or out, provide quick access to backcountry locations, and when landing and taking off the balloon tires typical of these aircraft put the least amount of physical wear on the land then any other human use for the access they allow. Please don't block access to the precious locations to the vehicles that would impact it the least.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8773-1	Max Palmer		Pilots are some of the most responsible users of the backcountry always leaving no trace. Closing these valuable airstrips is unfair to the users that have the least impact. I am firmly opposed to this proposed closure.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8778-1			My personal experience in aviation may be limited but I can speak to the fact of how this could be a major blow to backcountry aviation. Aviation as a whole is already becoming small. Backcountry aviation is a much smaller percentage of these existing pilots. Removing these strips further reduces the amount of places and amazing sights these people may get to see.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
879-1	Alexander		I want to see these backcountry airstrips preserved so future users (including myself) have the opportunity to visit.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8810-1	Jason Stiffey		Aircraft have such minimal impact on the terrain this is silly. Not to mention how keeping all these airstrips open could reduce the amount of OHV damage by affording an avenue for people to be air dropped in in lieu of taking a vehicle or even a horse that will have a greater impact on the vegetation	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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					aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
881-1	Elijah Brown		I would like to urge that access to the airstrips be retained. Although we are not the majority users of public lands, we are likely the most regulated and least intrusive of powered vehicles. The vast majority of back country pilots are responsible and courteous leaving a strip better than they found it. Our light aircraft cause very little impact to the environment as compared to side by sides and other ground based vehicles.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8820-1	Nicholas Maughan		I'm writing to express my strong opposition to the draft Resource Management Plan (RMP) for the Bears Ears National Monument. Limiting aircraft use to just Bluff Airport and Fry Canyon Airstrip would significantly restrict access to this awe-inspiring public land. For years, I've taken my children on unforgettable backcountry flying trips to the Bears Ears. Landing at established airstrips, we've explored towering canyons, marveled at ancient petroglyphs, and camped under breathtaking starry skies. These experiences instilled in them a deep appreciation for nature and a sense of adventure. Here's why this plan should be reconsidered: * **Minimal Impact:** Aircraft generate minimal noise, especially during brief takeoffs and landings. We primarily use existing airstrips, leaving a much smaller footprint than OHVs. * **Responsible Use:** We strictly adhere to "Leave No Trace" principles, ensuring the environment remains pristine for future generations. Airstrips even help reduce pressure on popular campsites by allowing us to camp near designated landing zones. * **Accessibility for All:** These airstrips play a crucial role in search and rescue, firefighting, and providing access for people with mobility limitations. They also offer safe landing spots for transient pilots in case of emergencies. * **Historic Preservation:** Many of these airstrips have existed for over 70 years and are documented on historical maps. Surely, we can find a way to honor Utah's rich aviation history while protecting the Bears Ears.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
882-1	Dave Stillman American Fork, 84003		Please don't close off Aviation from the Bears Ears. I have been involved in aviation in Utah for over 30 years and started flying the UT back Country about 4 years ago. The joy that flying into these back country strips brings is immeasurable. It has inherently made me an ambassador for the Lands we enjoy. We advertise to other pilots and UTV Enthusiasts to take care of these lands. We jump in and clean up and take care of these lands because we enjoy them and we feel part of the outdoor Recreation community. Closing these removes a very large team of Professionals, Enthusiasts and most importantly ambassadors for these lands. It also only punishes those same people for no reason at all. The noise is very low, there is virtually no dust or damage done to the land.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8824-1	Carson Adams		These runways allow for backcountry aviation to continue as a way for people to see and experience that amazing land and nature that this country has to offer. Removing nearly all of these airports would severely limit access to these areas of the country.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8826-1	Dan Butfham 3554 W. Balducci st Meridian, ID 83646	AOPA, EAA, Backcountry pilots of Idaho	Please do not close the back country airports or restrict aircraft to land on any of these airports. Aircraft in general do far less damage than any other type of vehicle. Aircraft do not pose the same threat to wildlife as a UTV, or motorcycle. They do not harm the environment and typically are operated by very responsible, professional and environmentally conscious adult's. Pilots are not known to drink and fly, cause destruction and leave trash. Please consider the general aviation community that enjoy flying in the remote areas of Utah and the surrounding states. I should also note that if there is an injured person or assistance needed any pilot in the area would more often than not donate their time and aircraft to assist Search and Rescue. If you shut down the 16 back country airports, that means that we will it be able to land and assist anyone in need.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8834-2	Josiah Meiring 8230 Collier Blvd Naples, FL 34114		I urge you to consider the minimal environmental and noise impact of general aviation compared to off-road vehicles. Preserving these backcountry airports is essential for maintaining the delicate balance between enjoying nature and protecting it. Please keep the skies and the backcountry airstrips open for those of us who truly appreciate and respect the wilderness.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-1	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Beyond these famous routes, there are hundreds of miles of lesser-known primitive roads that allow motorists to explore deep into the backcountry of one of Utahs most spectacular regions, providing access to treasured dispersed campsites, scenic overlooks, hiking trails, and archaeological sites. It is vitally important that the existing road network in the monument remain intact in order to continue to provide access to the high quality recreation opportunities the area is known for, and we urge the agencies to avoid adopting any management prescriptions which would result in significant numbers of road closures. We are extremely concerned by the management approaches proposed in the agencies preferred alternative E as well as alternative D, both of which appear likely to impose dramatic, unwarranted, and unprecedented restrictions on all forms of recreational activity within the Bears Ears National Monument. Motorized recreation appears to have been particularly singled out for restriction, as the preferred alternative E would close the most valuable motorized route in the monument (Arch Canyon) and alternative D would close dozens more. Extreme restrictions on other popular activities such as camping, target shooting, and drone flying are also included in the preferred alternative. None of these restrictions are warranted and are a violation of the inherent purpose of a National Monument designation, which is to set aside special places for the American people to enjoy.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, Arch Canyon would remain available for motorized and non-motorized use under a permit system. The permit system would be developed as part of the BENM Travel Management Plan in the future.
889-104	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	The mere fact that some unknown number of people have expressed an interest in multi-day backpacking trips in Arch Canyon and object to the presence of motor vehicles there does not constitute a conflict of uses as defined by the BLMs travel management rules, nor is it an impact on the physical environment. The BLMs travel management regulations require that, Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.26 However this regulation does not mean that motorized use and hiking/backpacking are fundamentally incompatible, or that motorized use must be excluded anywhere that some members of the public consider desirable for hiking. In most places, hiking and motorized use are fully compatible and it is completely normal and expected for them to share the same routes. It is possible that some OHV routes could be so heavily used by vehicles as to make them unsafe for hiking, but that is not the case in Arch Canyon, which receives only light motorized traffic outside of organized events. While hikers may find the occasional OHV driving past mildly irritating or annoying, there is no evidence of any fundamental incompatibility between the two activities. There is no reason why anyone who wishes to do a multi-day backpacking trip in Arch Canyon cannot do so right now. Indeed, currently only about half of Arch Canyon allows motorized access at all. The upper reaches of Arch Canyon, as well as its other branches in Butts Canyon and Texas Canyon, are located in the Arch Canyon USFS Roadless Area and are off limits to vehicles. Anyone who wishes to backpack away from the noise and dust of motorized vehicles can do so there, driving to the end of the Arch Canyon road to reach the trailhead for the upper canyon. The status quo thus provides a good balance between motorized and non-motorized recreation, dividing the canyon into separate motorized and non-motorized zones allowing both user groups to effectively share the canyon. If the BLM portion of Arch Canyon were to be closed to vehicles as proposed in alternatives D and E, it would destroy this balance by allocating the entire canyon exclusively for non-motorized recreationists and excluding motorized users completely. That would be highly unfair to motorized users and to people with disabilities, for whom motorized vehicles provide their only means of visiting the canyon at all.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon in a manner that protects Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future.
889-118	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Lastly, the ongoing maintenance and stewardship of these airstrips, carried out in collaboration with organizations such as the Recreational Aviation Foundation and Utah Backcountry Pilots, exemplify the commitment of the aviation community to uphold Leave No Trace principles. This cooperative effort not only ensures that these airstrips are well maintained but also conserves BLM resources that could be directed towards other conservation efforts within the monument.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
889-42	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We are pleased to see that none of the current action alternatives would mandate the closure of the roads in Lavender and Davis Canyons, and urge the agencies to keep it that way in the final management plan. Alternative D would close part of the motorized route in Dry Canyon (a side canyon off Lavender Canyon), which we strongly oppose as this route provides valuable camping opportunities and also provides access to a pair of scenic double arches at its end.	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, much of the land bordering Canyonlands National Park is allocated as OHV closed, in response to the NPS request to protect soundscapes and visual resources within the NPS unit. A portion of the Dry Fork Road is within this OHV closed area under the Proposed Plan. Conversely, the Lavender and Davis Canyon roads are within areas allocated as OHV limited to respond to the need for access to opportunities within Canyonlands National Park, permitted by NPS.
889-43	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Finally, the motorized route on Lavender Mesa is another extremely important route that provides access to the boundary of Canyonlands National Park. It is equally as important as the routes in Lavender and Davis Canyon and must remain open. This route is in inventoried lands with wilderness characteristics and would be automatically closed by the OHV area designations in alternative D. There is no justification for closing valuable motorized routes such as the Lavender Mesa road simply	TRAVEL01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, the Lavender Mesa Bench road is within the OHV Limited area. See the Proposed Plan, routes within off-highway vehicle area designation Map in Appendix A for more details.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			because of an inventory of wilderness characteristics. Any wilderness characteristics the area possesses exist even with the presence of the road, and it is not harming any existing wilderness characteristics. Closing roads to manufacture new roadless areas and wilderness characteristics that have never existed in an area is an improper use of the wilderness characteristics inventory. Alternative Ds proposal to manage all areas with inventoried wilderness characteristics as OHV-closed is arbitrary and leaves no room for agency discretion to keep open valuable motorized routes like the Lavender Mesa road. We strongly oppose that action, and urge the agencies to keep this route open in all action alternatives.		
889-46	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Lockhart Basin is one of the most popular and highly treasured motorized routes in all of southern Utah. Because of its length, it is especially popular with overlanders, who enjoy driving it as a multi-day trip and camping in the middle. At least one commercial four-wheel-drive guide service offers multi-day overlanding tours on this route. It provides the only motorized access into Lockhart Basin, and also accesses numerous side routes including the road down Lockhart Canyon to the Colorado River and a couple overlook spurs of the Colorado River – one of which also provides access to a backcountry airstrip. We note that the entire Lockhart Basin route, as well as its side spurs, are either cherry-stemmed or within lands with wilderness characteristics and are thus at risk of closure under alternative D. Many of its side spurs to scenic viewpoints and canyons would be closed outright by the OHV area designations in alternative D, even if the main route would be kept open for now under all action alternatives. We strongly oppose the OHV area designations in alternative D, and urge the BLM to keep all existing motorized routes in Lockhart Basin and the surrounding area open in the final management plan. The monument proclamation does not impose any requirement to close roads in favor of wilderness characteristics, and closing these routes would severely harm the ability of the public to enjoy the northern part of the Bears Ears National Monument.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS request to protect soundscapes and visual resources. However, several of the routes referenced by the comment are in OHV limited areas. See the Proposed Plan, routes within off-highway vehicle area designation Map in Appendix A for more details. The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3
889-75	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We find it extremely disturbing that the agencies are proposing to take a rule which has heretofore mainly applied in designated Wilderness Areas and apply it broadly across a massive national monument that allows other forms of recreation, including motorized use, in most of the action alternatives. This sets the precedent that flying drones is an illegitimate activity on public lands and that the default management approach should be to ban it. In reality, flying drones is a perfectly legitimate activity to do on public lands. As long as all existing BLM, Forest Service, and FAA regulations are followed (including not harassing wildlife and not flying directly over people), drones have minimal impact on either wildlife or other public lands users and should continue to be allowed to be flown on all monument lands outside of designated Wilderness Areas and perhaps WSAs.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan in Section 2.4.21.3 allows for launching and landing of UAS (drones) at several locations on BLM lands and under permit on NFS lands if they are needed for the management and protection of the objects.
891-1	Lee Trotter		Please do not limit our access as we have worked hard over the many years to keep our land beautiful. There are multiple landing strips in the Bears ears region. These allow us access to camping and hiking opportunities. Additionally, these landing strips, provide access for rescue and emergency landings.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
893-1	Mark Lenox 5485 Villa mirage Ct Idaho Falls, ID 83404		None of the backcountry airstrips in the Bears Ears National Monument should be closed without serious review. These strips are recreational assets that have been in place for many years. They provide access to the National Monument without additional roads and surface infrastructure that allows for more disbursed usage of the area.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8941-1	Pete Myers 17 Gold Trail Santa Fe, 87508		I am a glider pilot, and am opposed to closing the backcountry air strips in Bears Ears National Monument. We are at a point in time wherein light sport aircraft are quieter, more fuel efficient, and good citizens of the sky than ever before.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8948-1	Scott Snider		Ive met pilots who have used them for search and rescue, fire fighting, archealogical research, and other valuable - possibly life-saving - reasons. Theyre a wonderful treasure and resource. I fully	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			support and recommend keeping open for aviation use the 16 airstrips under consideration for closure within the Bears Ears National Monument Resource Managment Plan.		Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
895-1	Paul Barthel		I would be greatly disappointed if many of these airstrips were closed. Not only do these strips open the country to citizens, they provide much safety to pilots and passengers allowing safe locations for an emergency or cautionary landing. Please do not close!	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
896-1	Stephen Booth		Closing these back country airstrips is a bad idea. They have been used and maintained by back country pilots for years and years. Please reconsider because losing these assets will be not reversible and a great loss to the aviation community.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
8986-7	Britt Hornsby 190 N 3rd East Unit #1 Bluff, UT 84512	Town of Bluff	BENM desperately needs cooperation with the FAA to develop air restrictions and guidelines akin to agreements with the National Park Service elsewhere in San Juan County. Currently there are no restrictions for air tourism within the monument even though it is possibly one of the most disruptive activities a commercial or private group could engage in on the landscape. Bluff is home to one of only two airports allowed for takeoffs and landings in BENM. There is no guidance for managing commercial interests at this airport outside of the language used in basic land based SRPs. Also, while efforts have been made in the draft to address air traffic in the monument by limiting take offs and landings to only two airports, the plan does nothing to address the threat of air traffic caused by Utah SLA lands.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan has changes in the travel management section in Chapter 2 for motorized aircraft. The BLM and USDA Forest Service have different authorities for managing aircraft and they are more limited that NPS regulations. Further, the land use allocations in the Proposed Plan only applies to Federal lands administered by the agencies and does not set the management direction for State or private lands encompassed within the boundary.
8999-10		International Mountain Bicycling Association	Therefore, we provide our comments as a perspective that is shared by many across the country and as a desire by our members to experience wild places via the efficient and sustainable transportation by bicycle. This perspective is that bicycle use on trails and rural remote dirt and gravel roads on public lands is an appropriate and sustainable activity that should be provided for in ample supply due to its inherent sustainability. Recreational trails, such as those authorizing bicycle use, are effective tools for conservation of natural resources. Trails direct people onto planned and managed linear features that have been designed to avoid and minimize impacts to the extent possible and minimize unauthorized off trail impacts that might occur where demand exists yet trails may lack.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Proclamation 10285 specifically excludes recreation as a Monument object to be protected, while still naming out the world class outdoor recreation opportunities, including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. It also notes the importance of these recreational activities on the regional economy. As such, the agencies sought to develop alternatives that would provide for appropriate recreational opportunities commensurate with protecting BENM objects. The BLM and USDA Forest Service will develop implementation-level travel management plans that will be guided by the landscape-scale management direction provided in the RMP/EIS. The implementation-level travel management plan will assess existing motorized/mechanized trails and routes, as well as future needs and opportunities.
901-1	Jon L		The proposed restriction to only Bluff Airport and Fry Canyon Airstrip overlooks the rich historical and recreational significance of other airstrips like Browns Rim and Fry Canyon South. These airstrips not only serve as gateways to pristine wilderness but also support essential functions such as firefighting and emergency services. Moreover, backcountry aviation's minimal environmental impact and transient presence underscore its compatibility with the goals of responsible land management. I urge the BLM to reconsider these limitations and preserve access to all airstrips within Bears Ears, ensuring that future generations can continue to make their own cherished memories in this unparalleled landscape.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9013-1	David Larson		These airstrips should be viewed as an asset to the Monument rather than a detriment. They offer substantial recreational value and some have been operational since the early1950s. Removing access to 16 airstrips is not needed to ensure BENM remains primitive to backcountry enthusiasts. Should there be a clearly identifiable problem with one or two of these airstrips in the future, access could then be removed on a case by case basis.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.

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904-1	Eric Holmstrom		These airstrips are also a great asset to pilots transiting the area that may need them for an emergency or precautionary landing. They also provide access for emergency situation such as evacuation of an injured person that may take much longer to reach by other vehicles. These airstrips are a great treasure to us aviators that use them to enjoy Utah and Bears Ears, and I hope you will consider leaving them open.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9044-2	Jacob Strong		I hope that the aviation community can retain retain access to the 16 airstrips that we would otherwise lose.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
910-1	Brad Powers		Why would public land no longer include air strips for the public? By taking away small public air strips, doesn't this just lead away for other large corps to profit from bringing people in on things like buses, cars, and groups of the same?	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9133-1	Scott Anttila		Aircraft are some of the least destructive motor vehicles used in parks and BLM land. Restricting aircraft used only two airports will be a loss for the national park and a loss for aviators. Limiting our ability to access the park in assist and caring for it. Aviators are caretakers of natural resources in the land, typically removing garbage and waste when we see it, leaving only footprints and taking only pictures. If aviators lose access to the multiple unmarked landing strips within the park. It is a loss to the park, not a gain and a loss to the public.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9143-1	Jeff Kirby		Please do not remove access from aircraft in Bears Ears. I have an autistic son who loves flying and this is the easiest way for us to explore and access this area. Aircraft pose little impact to the terrain as opposed to land based vehicles.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
915-1	Joe Framptom		I ask that aviation access to Utah's backcountry airstrips be protected in the draft Resource Management Plan for the Bears Ears National Monument. Aviation provides a low-impact way to access these remote, unique locations. I live in Arkansas and have flown to Utah many times to enjoy the specatular scenery in that region of the country, and I would be much less likely to visit these areas without aviation access. I understand that some people are concerned about noise associated with aircraft. I get that, and I and the people I fly with are careful to be respectful of others while operating in backcountry areas. I minimize low altitude flying, avoid multiple takeoffs and landings, and often park my aircraft for hours while I hike or camp nearby. Also, I support organizations like the Utah Backcountry Pilots Association and Recreational Aviation Foundation that work with the government to promote respectful stewardship of these areas. Compared to a 4x4 vehicle, my aircraft has much less impact on the surface of the earth and, because my flying is limited to only a few hours a day, my noise signature is limited.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9228-1	King Nolan		This land should continue to stay open to general aviation!, which is Very low impact.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no

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					designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
923-1	Patrick Jennings		These areas are valuable recreation assets to all citizens and, out simply, where a person can take a horse or mule, bike or UTV, or a four-wheeler another can take an aircraft suitable to that place. I fully understand that some fields should be closed for safety and maintenance reasons, or proximity to fragile natural/cultural resources - but clearly not 16 of the 18 meet that criteria.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9236-1	Mayor Brandon Stanger		Please keep Bears Ears open to aviation including all airstrips. I have flown to many small landing spots over my life with my brother. Unfortunately he passed away in a plane crash. I would be devastated to see the BLM close these magnificent areas to pilots and take away those memories we shared together. I feel bad for all those who are disabled and can't hike to many areas within Bears Ears. Small airplanes have very little noise. They can take people, such as my mom who can't walk well and allow her to see the magnificence from the air and take very short hikes from small airstrips. Please don't close these areas to everyone except hikers. This is a national treasure that needs to be shared for everyone. Please don't listen to those who scream the loudest. They are the minority. Listen to the silent majority who trust you to make the decision for the greater good and not one small segment of the population.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9239-1	Joe Richards		I am writing today to make sure we don't close down the airstrips in utah Bears Ears and other BLM lands. Airplanes are so much quieter and have far less impact on the land than traditional and or newer recreational vehicles. I have flow to severe of these sights and love the land and the enjoyment we all get from being there.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9296-5	John Carter PO Box 464 Bondurant, WY 82922	Yellowstone to Uintas Connection	Allowing ohvs across the landscape with alternatives allowing up to 50% of the BENM open to their use results in the same impacts to soils as livestock grazing when they leave roads. There should be severe restrictions on ohv use, no cross country travel, adequate enforcement, recognition of their role in climate change, and disturbance to wildlife and quite recreationists.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	There are no OHV-open areas in BENM under any of the alternatives including Alternative A (existing management), meaning that all OHVs are and will be required to stay on designated routes and no cross-country travel is allowed. In addition, the Proposed Plan allocates 637,615 acres of BENM as closed to OHV use meaning that use of OHVs is prohibited in these areas (see Management Actions by Alternative in the Travel and Transportation Management section in Chapter 2).
9304-1	David Lee 73 E Columbus Court Salt Lake City, 84103		As an active pilot, aircraft owner, and user of the natural resources and camping provided by this beautiful area, it is unfortunate that the draft plan intends to close or restrict access to as many as 16 of the landing strips in the area. These landing areas are not only historically significant ... many date back to the early 1950s... they are critical way to access the area without the destructive transit damage caused by other OHV and similar vehicles. Aircraft have minimal impact to the landing strips, and really no impact to the surrounding areas. Aircraft do admittedly have a noise impact, but even that is transient issue lasting a few seconds if anything at all. Further these strips offer critical access points to the area in terms of air ambulance, fire control, wildlife management, etc. More importantly these are beautiful areas that are otherwise difficult and dangerous to access with OHVs. Aircraft are not only safe, they are efficient, and have little to no impact to others in the area. Please remove the landing strip closures and restrictions from the RMP and keep these areas accessible and safe as they have been for the last 70+ years.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9333-1	Todd Niles		I have flown my light airplane over Bears Ears several times. It is rugged country, with very little off airport landing opportunities. In an emergency, for example engine trouble, I need places to land. These existing back country airstrips provide me with an opportunity to get the airplane on the ground safely, without damage or injury. Even if I never actually land on one of these back country airstrips, I, and every other pilot, is using these airstrips. The airstrips already exist. They are a minimal impact on the land. I don't see how an aircraft landing on them hurts the environment of the area. Please do not close any of these back country airstrips. Pilots need airstrips just as cars need shoulders, crash barrels, and guard rails.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
9336-1	Patrick Colwell		Having placement of grass strip in remote areas provides emergency landing areas for all aircraft. Removing these would leave less options for local or transition aircraft thru the area. Aircraft landing on grass strip have low impact on the surrounding area. Please reconsider removing these assets that are of use to general public and aviation safety.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM

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					Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
937-1	Dewey Levie 1059 Craftsman Drive Prescott, AZ 86301		Please do not restrict access to the existing airstrips in the BENM. General aviation has one of the smallest environmental impacts of any transportation mode, and these strips have been open for many decades without incident.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
9372-38	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	The BLM, like every other organization, is required to adhere to ADA regulations. As part of that, the BLM's acknowledgment of their efforts to adhere to those regulations includes the statement, "These guidelines include trails, campgrounds, picnic areas, and beaches" I don't think anybody is expecting, or would even appreciate concrete sidewalks to every point of interest within the monument, but Arch Canyon, for example, has a trail that provides access to many, many cultural and landscape sites of interest and educational value. The trail exists physically and has been embattled many times which has continually proven its validity. It has been addressed by archaeologists, and riparian studies multiple times and has been cleared for use. To close an open and approved trail that provides access to not only the elderly and young children for family gatherings but also to physically impaired individuals and wounded veterans is in opposition to ADA standards.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	Under the Proposed Plan in Section 2.4.21.3, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit, which would allow for access to Arch Canyon in a manner that protects Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future.
9372-40	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	A big proponent of the National Monument was the idea to Preserve and Protect the area for future generations. If we restrict access and make it too difficult for people to use and enjoy the many resources and recreational aspects of this region, there will be no future generations enjoying the area. It will become forgotten by guests no longer visiting or using the areas. I performed a social media survey in a group that is passionate about the outdoors and this area. I asked 1,700 people if they had visited Angel Arch in Canyonlands since the road was closed if people had visited the closed portion of Recapture since it has been closed, and if people have hiked to Keyway Arch in Arch Canyon that has never had road access. 19 people had never been to Angel Arch since the closure, while 1 had a few times, and 1 had been often. For Recapture, which is minutes out of Blanding City limits, had a response of 11 never been since the closure, 7 a few times, and 1 often. Keyway Arch received a response of 15 never beens. Angel Arch in Canyonlands is a 26-mile hike. Recapture is only a 7-mile through hike and there are ways to do shorter segments. Keyway is a 10-mile round-trip hike. Although the survey is small in scale, I think it gives a picture of the numbers who will visit Cathedral and Angel Arch in Arch Canyon. Arch Canyon is 9 miles in and 9 miles out. It seems that natural resources are wasted if nobody gets to use or enjoy them. You are proposing that we lose reasonable access to such wonders because some users want to hike in silence along the few corridors where there is currently access.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan provides management actions that allow for access to enjoy the many resources and recreational aspects of BENM in a manner that protects Monument objects.
9372-42	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	The lack of studies to close Arch Canyon is exceptionally worrisome when the same claims made in this draft plan have already been presented and defeated multiple times. The most recent ROD stands from 2010 following a lawsuit presenting said claims. The ROD clears the OHV ROW from causing damage to the historical or sensitive sites in the canyon. The ROD clarifies that the OHV ROW causes no negative impacts to the functionality of the riparian system or the fisheries. This report can be found at https://secure.suwa.org/site/DocServer/archCanyon_BLMDecision.pdf;jsessionid=00000000.ap20116a?docID=10801&NONCE_TOKEN=A1289805BB6DF6CEF1172B4AD746A8A2a	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The Proposed Plan allows for motorized and non-motorized use in the Arch Canyon RMZ with a permit, which would allow for access to Arch Canyon in a manner that protects Monument objects. The permit system would be developed as part of BENM Travel Management Plan in the future. Additional analysis of the route may occur during implementation level which will be subject to public comment.
9383-2	Jeff Hansen 180 N 2400 W Ste 106, ATTN: Utah Aviation Coalition Salt Lake City, UT 84116	Utah Aviation Coalition	Granted, your RMP specifically states that you are not closing the airstrips but the only locations that aircraft will be able to take off and land will be Bluff Airport and Fry Canyon Airstrip. You are essentially closing these airstrips. Without the recreational aircraft use in BENM, these airstrips will be left to ruin and become unusable in just a few years. The groups that promote airstrips like this are the only source of maintenance. The BLM does not maintain these strips, the users do. In just a few years, these resources will become so overgrown and washed out by storms that an emergency evacuation helicopter will not even be able to find the landing spot, much less safely land a helicopter there.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
942-1	James Densmore Colorado Springs, 80919		I understand BLM is planning to close 16 airstrips in Utahs Bears Ears National Monument (BENM). This action is unduly precipitous. While perhaps due process is not required, what harm can come of indulging in due process? Government should be open and transparent, and should serve the needs of all citizens where possible. All 18 of the airstrips have existed and have been in use at least for the	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

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			past 40; some for 70 years! There is a significant collection of pilots who use these airports regularly. None of them should be closed or banned without evaluating the merits of each.		aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
946-1	Rich Pickett		As an avid general aviation pilot with over 40 years of experience, I wholeheartedly support the preservation of all existing remote airstrips in the Bears Ears National Monument. These airstrips, which have served the community for decades, provide unique and invaluable access to this pristine wilderness for private, non-commercial use. General aviation access safeguards the integrity of the National Monument by offering a low-impact means of visitation. Unlike road vehicles, aircraft require no infrastructure such as roads, bridges, or corrals, thereby minimizing environmental disturbance. The transient nature of aircraft noise further ensures that wildlife and the natural serenity of the area are preserved. These airstrips are not merely entry points but are vital lifelines in emergency situations, offering crucial support for search and rescue operations, emergency response, and firefighting efforts. Their existence can mean the difference between life and death for aviators encountering mechanical issues or adverse weather conditions over the rugged terrain of southern Utah. Moreover, these airstrips provide inclusive access to our public lands for individuals with limited mobility, enabling them to enjoy recreational activities without the need for strenuous physical exertion. The aviation community, known for its Leave No Trace ethos, uses these airstrips as trailheads for hiking, camping, and other low-impact activities, ensuring minimal environmental footprint. Organizations such as the Recreational Aviation Foundation and the Utah Backcountry Pilots collaborate with the BLM and USFS to maintain these airstrips, saving administrative resources and promoting cooperative stewardship. Closing these airstrips would not only diminish the rich history of aviation in this area but also limit the recreational opportunities for many. I urge the BLM to retain access to all 18 airstrips to continue the legacy of responsible and sustainable enjoyment of Bears Ears National Monument.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
947-1			Please consider keeping these assets available. Both for recreation and for backcountry rescue efforts, such airports provide otherwise unavailable access, with little annual maintenance cost. By their nature, these airports are in areas with little negative impact to other recreational uses of nearby land. Once these assets are changed from airports, there is little no no hope they will return.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
948-1	Troy Minske		The proposal to close several back country strips in Utah is a poor decision. As a pilot who visits the strips (in other states also) the serve a great purpose. They provide access to these areas that do not require roads or any other infrastructure. We leave these areas as we found them. Aviation allows access to people that may not otherwise be physically able to visit & enjoy them. These strips are the same as they have been for decades-a testament to the pilots who have visited them—leave no trace.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
951-1	Tigre Pickett		I strongly advocate for keeping all remote airstrips in the Bears Ears National Monument open. These airstrips have been integral to the recreational and emergency needs of the aviation community for decades and should remain accessible for private, non-commercial use. The remote airstrips in Bears Ears are not only vital for the enjoyment and appreciation of this national treasure but also play a crucial role in protecting its environment. General aviation access requires no roads or heavy infrastructure, significantly reducing environmental impact. The light footprint of aircraft access ensures that the natural beauty and ecological integrity of Bears Ears are maintained. These airstrips have served as essential points for dispersed primitive camping, particularly in an era where backcountry usage by road vehicles has increased. Aviation provides a unique and low-impact way to experience these remote areas, minimizing dusty road traffic and preserving the natural landscape. Furthermore, the strategic placement of these airstrips on natural flat land features means there is minimal soil disturbance or erosion. The noise from small aircraft is fleeting and has been shown through peer-reviewed research to have no significant impact on wildlife. In addition to recreational benefits, these airstrips are critical for safety and emergency response. They offer vital access for search and rescue operations, emergency medical response, and firefighting efforts, potentially saving lives in the challenging terrain of southern Utah.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
955-1	Michael Decker PO Box 425 Baxter, TN 38544		I write to object to the proposal to close, pending further evaluation, 16 of 18 remote airstrips in the Bears Ears National Monument. This approach is backwards: these airstrips, which have been in use for many decades and in most cases predate the 1964 Wilderness Act, should remain open for use by noncommercial fixed-wing aircraft operated for personal recreation use. These backcountry airstrips provide low-impact access for hiking, fishing, camping, and similar recreational activities as	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			well as providing an array of landing sites suitable for emergency use, whether in response to natural disasters or by aircraft in distress. Access to the same areas by land vehicles would create vastly more environmental impact; the impact of aviation use is very small.		aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
957-1	Edward Pierson Vashon, WA 98070		I object to the proposed plan to close multiple back-country airports in the Bear Ears National Monument. It appears to be a "shotgun" approach to a problem that may not even be a problem. At the very least, users should be consulted to determine if an airstrip is hazardous or presents a unique ecological problem. Prior history shows that once a remote airport is closed it is very difficult to get it back into use.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
961-1			Ive flown over these airstrips many times they have always been my incase of emergency landing spots By keeping them open one day it could save a life.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
962-1	Mike R.		Restricting access to them would deprive future generations of getting to experience what true remote wilderness is like. Remote airstrips like this are crucial for rescue and firefighting operations. Furthermore, a small strip with responsible aviators is far less destructive to the environment than say a network of trails for motorized vehicles. I ask you to preserve responsible taxpayer access to these public lands.	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Motorized vehicles operated during emergency and administrative authorized use are not considered OHVs under 43 CFR 8340 and would still be allowed.
989-1	John Mikkelsen		Please do not restrict access to any of the existing airstrips in the BENM. I have personally utilized a backcountry strip to wait out a severe storm. Had that strip not been there, I might not be here to express my distress about closing airstrips that have been in operation for 40-70 years and have probably saved lives such as mine! In addition, accessing these trailheads and recreation areas by aircraft is the most environmentally friendly manner possible, requiring no miles of dusty roads or other infrastructure. Aviation access is the least impactful and aviators practice the Leave no Trace ethic. Please leave these valuable Public airstrips available for people to enjoy this Publicly owned wilderness!	TRAVEL01-General, ALT07-Modification of Existing Alternatives	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17668-1	Emily Ostler		As such, I have seen that I was doing direct damage to the landscape by being there but did not know I would be driving in such a delicate, populated ecosystem. Therefore, I affirm that limiting motorized vehicles to smaller areas will preserve delicate desert ecosystems, wildlife corridors, and water quality	TRAVEL01-General, ALT07- Modification of Existing Alternatives	See the Proposed Plan changes in the Travel and Transportation Management Section in Chapter 2. Also see figures in Appendix A for maps.
610-1	Peter Gatch		If some kind of development is allowed on those lands every restriction must be implemented to reduce impacts of the roads accessing the SITLA parcels. Those access roads/points should be restricting times, seasons, size of vehicles, number of vehicles, only official vehicles, non-recreational vehicles, etc.	TRAVEL01-General, ALT07-Modification of Existing Alternatives, LAND01-General	Management Actions Common to All Action Alternatives in Chapter 2 Lands and Realty was clarified to state the BLM would grant reasonable access to public lands for economic purposes on a case-by-case basis. case-by-case basis consistent with protection of BENM objects.
840-5	Wendy Lessig	Recreational Aviation Foundation	Aircraft which overfly the BENM are not within the jurisdiction of the BLM or BENM managers, but rather the FAA. The FAA has a specific symbol that is used on the aeronautical charts that pilots use for navigation that outlines areas that are sensitive to noise. The symbol is a solid blue line with blue dots spaced along the inside of the solid blue border line. Pilots are requested to fly at or above 2,000 feet above ground level in the areas that have the blue line/dot border to reduce aircraft engine noise at ground receptors. The National Parks and the National Recreation Areas near the BENM already have this chart symbol. As a National Monument, the BENM might consider checking with the FAA to see if the blue line/dot could be added to the aeronautical chart to outline the border of the BENM with the aim to preserve the quiet soundscape in the BENM. Pilots often seek flight instruction from qualified flight instructors to better hone their backcountry flying skills. The instructional flights are not considered a commercial operation, but they may make more frequent takeoffs and landings than pilots who simply fly to an airstrip to park their airplane and camp. Flight instructors should	TRAVEL01-General, ALT07-Modification of Existing Alternatives, NOISE01-General	This comment is outside of the scope of this planning effort. BLM lands are not covered under the National Park Air Tour Act of 2000 (49 USC 40128), and therefore are not subject to special overflight rules by the FAA. Limitations could be applied to takeoff and landings at specific airstrips if designated during implementation level travel planning.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			know to teach prospective backcountry pilots the noise etiquette for flying in the backcountry, but a few reminders in the BENM RMP (or in the future BENM TMP) could help pilots to be extra-courteous with respect to aircraft noise. The BLM might consider requesting that flight instructors who provide backcountry flight instruction to focus their repeated backcountry takeoff and landing practice and instruction with their students at Bluff Airport and Fry Canyon Airstrip. The BLM might consider requesting that pilots not make practice or repeated touch-and-go landings, balked landings, and go-arounds at airstrips in the BENM other than at Bluff Airport and Fry Canyon Airstrip. A touch-and-go landing is when an aircraft makes an approach to land but then just after touching down on the airstrip surface, applies power to take off again. A go-around, also known as a balked landing, is when an aircraft makes an approach to land, but then before touchdown, applies takeoff power to take off again. Sometimes it is necessary to make a balked landing if there is a hazard on the airstrip. However, backcountry airstrips in noise sensitive areas are not an appropriate place to practice or make repeated touch-and-go landings and go-arounds. The BLM might consider requesting that pilots not make practice or repeated stop-and-go landings at airstrips in the BENM other than at Bluff Airport or Fry Canyon Airstrip. A stop-and-go landing is when an aircraft lands, stops the aircraft, and without shutting off the engine, takes off from the airstrip either in the original direction of landing or turns around to take off in the opposite direction.		
889-20	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	While anti-motorized groups will no doubt emphasize in their comments the fact that recreation is not an identified object of the Bears Ears National Monument, we note that the proclamation specifically recognized that the monument is home to world class outdoor recreation opportunities including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater 15 rafting, mountain biking, and horseback riding that support a booming travel and tourism sector that is a source of economic opportunity for local communities. Though the 2021 monument proclamation avoided mentioning OHV recreation, its importance to the local economy is undeniable. Moreover, the motorized route network in the monument is what enables all other recreational activities to take place. Most of the monument is highly remote, and many areas can be accessed only by primitive four-wheel-drive roads. Driving these roads is in itself a valued recreational experience for many people, while others use them to access hiking trailheads, climbing sites, campsites, or archaeological and cultural sites. A robust motorized route network is key to enabling all forms of recreation, whether those participating in a given activity appreciate that or not. Despite this fact, there is no recognition in the DEIS of any positive impacts of the motorized route network in Bears Ears National Monument. Every mention of motorized routes and OHV use is negative, and motorized access is treated throughout the document as a threat to monument values or as a nuisance to be eliminated. Alternative D in particular would designate the vast majority of the monument as OHV closed in favor of managing for so-called wilderness characteristics, attempting to manufacture wilderness suitability by the mass closure of existing roads. This is utterly unacceptable. Any objective evaluation of motorized use in Bears Ears must recognize the positive aspects of motorized access as well as the negative impacts, which the agencies have not done. Such blatant bias against motorized recreation must not be allowed to form the basis of the new Bears Ears management plan. While certain anti-motorized interest groups love to claim that motorized recreation in Bears Ears is causing all manner of calamities, that could not be farther from the truth. In reality, the motorized route network in Bears Ears is currently well managed and is not causing any significant impacts to monument objects and values. There is simply no demonstrable need for a significant reduction in motorized routes as proposed in some action alternatives. The current motorized route network in Bears Ears is not haphazard or the result of a historical accident, but is the product of considered and deliberate travel management planning conducted in 2008 for BLM lands, and through MVUMs that are the product of many years of management actions in the Manti La Sal National Forest. The 2008 Monticello Field Office RMP already closed 316 miles of existing motorized routes in the area, with the remaining routes providing the bare minimum access necessary for basic connectivity and transportation needs in the area. Road densities throughout the monument are already sparse, as evidenced by the fact that so much of the monument is listed as possessing wilderness characteristics. Opportunities for solitude are already abundant even in roaded areas and there is simply no need for mass road closures to create such opportunities. The existing motorized route network in Bears Ears has already been thoroughly evaluated for resource impacts as recently as 2008, and those routes that remain open have all been determined to have an important purpose and need. Routes in the Indian Creek and Shash Jaa units were again evaluated at least at a high level for compliance with monument objects and values under the Trump proclamation, and none were determined to pose any imminent harm that required their immediate closure. Among the routes evaluated in the 2020 management planning effort is the OHV route at the bottom of Arch Canyon, which (thanks to SUWAs repeated attempts to secure this routes closure over the last few decades) has been thoroughly evaluated no less than five times since 2006, and each time has been found to serve a valuable purpose and need and to not cause any significant adverse impacts on the environment. The most recent evaluation occurred in 2020, when the BLM determined that continued motorized use of this route would not cause any undue harm to Bears Ears NM objects and values, and decided to maintain the existing rules governing its use from the 2008 Monticello Field Office RMP. Given the long management history of the motorized routes in this area and their extreme importance to the local economy in	TRAVEL01-General, ALTO7-Modification of Existing Alternatives, REC01-General	Thank you for your comment. 43 CFR 8342.2(b) requires the BLM to designate all public lands as either open, closed, or limited to OHVs during the land use planning process (also see BLM MS-1626, Section 3.1). Additionally, 43 CFR 8342.1 requires the BLM to minimize user conflicts and resource impacts resulting from OHV use when making such area designations. The area designations in the Proposed Plan are consistent with those legal requirements. They are also consistent with the protection of BENM objects as discussed in the Travel and Transportation section of Chapter 3, and as described in Proclamation 9558 (incorporated by reference into Proclamation 10285). The effects of those area designations are addressed in several sections of the EIS including, but not limited to the Paleontological Resources and Geology, Water Resources, Terrestrial Habitat, Lands with Wilderness Characteristics, Wildlife and Fisheries, Recreation and Travel and Transportation Management sections in Chapter 3. As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC and other Tribes and stakeholders including state and local governments. In accordance with 43 USC 1711 and policy direction in BLM Manuals 6230, <i>Considering Lands with Wilderness Characteristics</i>, the BLM completed LWC inventory from April 2022 to October 2023 and identified 421,965 acres that contain wilderness characteristics between existing and new inventories. Consistent with authority provided in FLPMA, the BENM Proposed RMP would manage approximately 205,594 acres of LWC to protect those characteristics. The BLM weighed protection of BENM objects and access to resources and uses of BENM when developing the Proposed Plan. See the Lands with Wilderness Characteristics and Recreation section of Chapter 3 for a discussion of impacts from OHV area designations. In OHV limited areas, the BLM would develop implementation-level travel management plans, and in that process would engage with the public, state, and local agencies, to inform route designations. Approximately 32 miles of routes currently designated as available for public OHV use would be impacted by the BENM Proposed RMP's closed OHV allocation. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW. As part of implementation level travel management planning, the agencies will conduct route by route analysis, looking at resources and uses associated with each route, in collaboration with the BEC and other Tribes and stakeholders including state and local governments. Section 2.4.2.3 provides that the agencies would collaborate with the BEC, Tribal Nations, and federal and state agencies in inventorying and monitoring BENM resources to develop a greater understanding of resource status and to provide effect management, which could include recreation use and travel. Under the Proposed Plan in the Travel and Transportation Management section, acquired lands would be managed consistent with the same OHV area designations of adjoining or surrounding lands, or as stated in the land transfer decision. This would provide for consistent OHV management across agency-administered lands. The area surrounding Arch Canyon would be managed as OHV limited under the Proposed Plan. Under the Proposed Plan, Arch Canyon is not designated as OHV closed. Motorized and

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			enabling all forms of recreation within the monument, any significant closures of motorized routes mandated in the new monument management plan simply cannot be justified either legally or factually. We therefore urge the agencies to consider and adopt the following general provisions regarding travel management: 1. Keep all existing OHV area designations from current management plans. The 2008 Monticello and Moab Field Office RMPs, the Manti La Sal National Forest forest plan, and the 2020 monument management plans have already thoroughly evaluated what areas are suitable for OHV use and what areas are not. There is no need to designate additional areas as OHV-closed. The current OHV-limited designation across every part of the monument where OHV use is allowed is fully sufficient to limit OHVs designated routes. Any changes to individual route designations should be made as part of a later travel management process, which is far better suited for detailed analysis of individual routes than a high level resource management plan. The recent trend in federal land management has been to separate route specific travel management planning from resource management planning. Thus the agencies should avoid making decisions regarding individual routes in this planning process and should leave decisions regarding individual routes to future travel planning. 2. Maintain existing decisions regarding lands with wilderness characteristics. The existing management plans carefully evaluated what lands were suitable to manage for the protection of wilderness characteristics (BLM natural areas) and those that were not. Those that were determined to be managed as BLM natural areas were without roads and already managed for non-motorized recreation. Lands determined not to be managed for wilderness characteristics had that determination for a reason, because those lands 17 were found to have other important resources or resource uses that conflict with protection, preservation, or maintenance of the wilderness characteristics. Designating additional lands with wilderness characteristics as BLM natural areas closed to OHV use would disrupt the existing careful balance made in previous planning efforts and would have a severe negative effect on multiple forms of recreation and other valid existing rights. 3. We urge the agencies to continue to follow the general travel management guidance established in the 2020 Bears Ears management plans. Specifically, we support maintaining all individual route designations under existing travel management plans until a new travel plan is developed. We also strongly support provision TM-4 from the 2020 Indian Creek and Shash Jaa Units Management Plan, Implementation-level travel planning in SRMAs and Extensive Recreation Management Areas (ERMAs) will recognize the San Juan County OHV route system and integrate it to the extent possible in travel management and recreational goals and objectives. We are disappointed to see this provision not carried forward in the draft management plan, which merely says the agencies should, coordinate with local government and the BEC and other Tribal Nations on implementation-level travel planning. This replacement provision is utterly insufficient, and we urge the agencies to restore the provision requiring specific recognition of the San Juan County OHV trail system. San Juan County has long maintained a thorough inventory of existing OHV routes and each route on their maps is extremely important for motorized recreation. Most routes in their route system are also claimed R.S. 2477 roads that should be kept open pending final resolution of their legal status. 4. We support the adaptive management framework for motorized use established in provision TM-6 of the 2020 monument management plans: As part of implementation-level travel planning, monitor OHV use areas and, if unacceptable impacts to natural and cultural resources are occurring, develop implementation-level limitations including route designation, route closure, motorized vehicle size and weight limitations, or other mitigation measures as necessary to address those impacts. Any route closures or other management measures should be developed in response to specific unacceptable impacts identified through monitoring, not done preemptively based on pure speculation. The best way to manage OHV use in the monument is with the least restrictive approach first, leaving room to escalate to increased restrictions later when necessary. 5. It is absolutely essential that the new monument management plan carry over provision TM-7 from the 2020 management plans: Any lands acquired by the BLM over the life of the MMP will be managed with the same OHV area designations of adjoining BLM-administered lands or as stated or implied in the land transfer. If clarification is absent, the BLM will manage the acquired lands as OHV limited. The type of limitation will be determined by implementation-level travel planning. Until that implementation level travel planning is completed, the OHV limited use will continue in the same manner and degree consistent with the proper care and management of Monument objects and values. This provision is vital because numerous state land parcels within the monument may eventually be transferred to the BLM and Forest Service. Many existing designated routes either pass through those parcels or continue onto them after leaving federal lands. One such example is the route leading to an overlook of Arch Canyon on a SITLA parcel at 37.57080, -109.72118. It is vital that these route segments do not end up being inadvertently closed simply because the underlying land was transferred to the federal government and the segments on state land had not previously been included in a federal travel management plan. We urge the agencies to provide clarity that all existing routes on former state land parcels will remain open to motorized use until considered in implementation level travel planning.		non-motorized use in Arch Canyon would be allowed with a permit, which would allow for access to Arch Canyon in a manner that protects Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future. Under the Proposed Plan, SRPs would continue to be allowed for motorized use on designated routes. However, competitive motorized events would be prohibited. While SRPs would still be allowed for motorized use in Arch Canyon, motorized events would be prohibited. See the Recreation section of Chapter 3 for a discussion of impacts from this management.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			6. Special recreation permits for motorized events must continue to be allowed for all routes currently permitted for events. Chicken Corners, Lockhart Basin, and Hotel Rock are currently permitted for Easter Jeep Safari, while Arch Canyon is permitted for Jeep Jamborees and has been used for Jeep Safari in the past. These two events are extremely important to the motorized community, and it is critical that they continue to be allowed to use these routes. Most of these provisions are incorporated into alternative A, and but are deliberately left out of all of the action alternatives. We strongly oppose this divergence from existing management, and see it as a clear sign the agencies intend to de-emphasize motorized recreation in the region going forward while favoring other uses. We strongly urge the agencies to re-incorporate these provisions into the final management plan to provide at least some protections for OHV recreation going forward.		
1121-1	Richard Davis		Often, as we hike past the signs we have to dodge ATVs, UTV's and the occasional maniac in a full blown SUV. This has to stop. There are many (too many) wide open areas for OHV's to run berserk without endangering hikers, the fragile terrain, wildlife, ancient pueblo sites and the scarce water in the canyon. We need Arch Canyon closed to protect it.	TRAVEL01-General, ALT07-Modification of Existing Alternatives, REC01-General	The Proposed Plan allows for motorized an non-motorized use in Arch Canyon with a permit, which would allow access to Arch Canyon in a manner that protects Monument objects. During implementation level planning, however, agencies may apply limitations including but not limited to type of vehicle, season of use, or timing restrictions, after a NEPA process, including a public comment period. The permit system would be developed as part of the BENM Travel Management Plan in the future.
916-2	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Develop a Reasonable Alternative to Address the Need for Motorized Access and Motorized Recreation for Youth [see letter for further detail and rationale]	TRAVEL01-General, ATTN06-Request to confirm receipt of letter, ALT06-Proposed, NEW	Under Presidential Proclamation 10285, new roads and motorized trails would only be constructed to protect objects in BENM and to protect public safety. Specific decisions on roads and trails will occur in future travel planning
18994-3	Redge Johnson (please contact PLCPO's archaeologist, Kristopher Carambelas)		Finally, the agencies should give more consideration to how travel management goals, objectives, and actions may impact the ability of Indigenous people to engage in ceremonial practices, cultural traditions, and economic activities that sustain daily living and are protected by the monument. Roads allow them to reach areas where things like game animals can be hunted and medicinal herbs and firewood can be collected within reasonable walking distances from parked vehicles. Areas closed to OHV travel by the RMP will impose limitations in the near future, and the subsequent travel management planning process is bound to close many roads that are critical to engaging in significant cultural practices.	TRAVEL01-General, CUL02-Traditional, Religious, or Cultural Use	See the Environmental Justice and Social and Economic Values section in Chapter 3 for a discussion of impacts to local communities from travel and transportation management and other decisions. See Appendix O for a discussion on Consultation and Coordination engagement with Tribal Nations to determine impacts on Indigenous communities. The Proposed Plan results in fewer miles of routes being closed as a result of area designations than Alternative D. Additionally, there are only 75 segments of roads all less than 1.5 miles long in the OHV closed areas in the Travel and Transportation Management Section in the Proposed Plan in Chapter 2. This will not substantially alter access to any part of BENM.
18082-46	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS states that there are 1,364 miles of BLM motorized routes and 476 miles of USFS motorized routes in the planning area (p. 3-434). It also states that OHV use has increased due to the growing popularity of ATVs and UTVs and that some locations within the Monument receive unmanaged, intensive OHV use (p. 3-436). In fact, the Draft EIS acknowledges that, Unmanaged and unregulated recreational use in BENM is identified as a major threat to values held by Tribal Nations. According to Appendix L of the Draft EIS, [T]he creation of numerous trails has altered the character of once near-pristine canyons. These new trails have led to the destruction of fragile and essential BSCs [biological soil crusts]. Other concerns related to OHV use include the development of ruts, damaged root systems of natural trees and plants, compacted soil, increased erosion, increased frequency of dust storms, increased sedimentation of waterways and springs, and user conflicts. The Draft EIS indicates that the BLM reviewed monitoring data and remote sensing data to better understand land health and ecosystem function, identifying departed watersheds and departed vegetation and soil conditions, and it may have used this information to close specific areas to livestock grazing in Alternative D (p. 2-8). To ensure the protection of Monument ROVs, we recommend the BLM use these data to evaluate closure of degraded areas to OHV use in the Final EIS. We also recommend prioritizing closure of unauthorized user-created routes to OHV use.	TRAVEL01-General, DATA01-Analysis Methods and Data	The Proposed Plan designates areas as OHV-closed or OHV-limited, using the best available data for the Planning Area. Specific routes will be designated as closed or open for OHV use under implementation-level travel management planning. Note that there are no areas of BENM that are OHV-open, meaning that where OHVs are allowed, they are required to stay on designated routes throughout the Monument.
972-1	Jordan Gluch		Aviation has very little impact on public land compared to most recreational vehicles. Many of us general aviation pilots are great representatives and stewards for land conservation and do more than our part to help leave areas that we access better than we found it. Please consider the impact of closing these areas to general aviation use.	TRAVEL01-General, DATA01-Analysis Methods and Data	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
17573-38	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	One very specific example of the Agencies failure to conduct a sufficient analysis of these closed zones can be found in Arch Canyon. The Agencies have failed to consider that the road up Arch Canyon, located in a proposed OHV closed area conveniently overlapping County Road D2117 (Arch Canyon Road) with surgical precision19 has a lengthy and storied history with the BLM. They fail to consider that an Administrative Record was signed on April 30, 1990, acknowledging Arch Canyon Roads RS-2477 status in stunning detail and thus admitting State and County ownership of the road. Despite that, they now propose to close D2117 over the State and Countys objections. They also fail to consider that on October 13, 2010, BLM issued a Decision on Arch Canyon Road that included a thorough analysis of the cultural resources within the canyon, the health of the riparian areas within the canyon, and the results of a lengthy study of the three species of fish that live in the canyon. That Decision concluded that D2117 was having no negative impacts on the riparian areas or fish habitat.	TRAVEL01-General, DATA02-Inadequate Methodologies	Under the Proposed Plan, Arch Canyon is not designated as an OHV closed area. Motorized and non-motorized use in Arch Canyon would be allowed with a permit. The permit system would be developed as part of the BENM Travel Management Plan in the future. See impacts analysis under the recreation section in Chapter 3 for impacts to recreationalists from various alternatives. The BLM could still grant authorized administrative access to Arch Canyon on a case-by-case basis consistent with the protection of BENM objects and Federal law. The State of Utah and its counties may hold valid existing rights-of-way (ROWS) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			It also concluded that the only impacts on cultural resources came from foot traffic but that eliminating motorized access would not resolve these problems. The Agencies also fail to consider that San Juan County was granted a 20-year Right of Way to D2117 in 2014. The State acknowledges that impacts can change after 14 years. However, a determination that the impacts have changed would require a proper analysis rather than sketching polygons on a map without knowing what roads or trails on within them.		on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
18112-14	Ivan London 2596 South Lewis Way Lakewood, 80227	Mountain States Legal Foundation	Simply put, the Bureau does not provide sufficient information to justify its proposed road closures. The supporting maps do not include all of the relevant roads, and a transportation plan should be finalized before pushing forward with any proposed revisions to the Plan that will close roads. Further, the facts belie the proposed closures. For example, a study was performed in 20092010 that proved the Arch Canyon OHV Trail did not have a negative impact on the protected resources that the Bureau now claims justifies closure. When asked about this in a May 9, 2024 meeting, the Bureau answered only that many years have passed, so things have changed. But where is the proof that things have changed? The answer only demonstrates the need for a more fulsome review of transportation issues before pressing forward with the aggressive slate of road closures.	TRAVEL01-General, DATA02-Inadequate Methodologies	The Proposed Plan designates areas as OHV-closed or OHV-limited, using the best available data for the Planning Area. Specific routes will be designated as closed or open for OHV use under implementation-level travel management planning. Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon in a manner that protects Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future. See the Water Resources section of Chapter 3 for a discussion of impacts on riparian resources from OHV use in Arch Canyon.
8410-1	Trent Herring		When we start looking into the areas on the maps that are proposed to be closed, there is not any information on the roads that are being closed on those maps. When we are looking at nearly 2 million acres, it is hard to see what is actually being affected as it pertains to those that enjoy OHV trails and other roads that are important to those that use them. It is very difficult to make a proper comment when this information is not included in the plan. These maps themselves are insufficient to the comments that need to be made on proposed road closures. How am I supposed to be able to see these roads without the appropriate mapping for them?	TRAVEL01-General, DATA02-Inadequate Methodologies	Please see the Appendix A for a static map showing each currently designated route and it's status within an OHV Limited or OHV Closed area for each alternative or the interactive map on the ePlanning website allowing for the same information to be viewed in detail.
916-10	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Provide for a Reasonable Level of Multiple Use [see letter for further detail and rationale]	TRAVEL01-General, DATA02-Inadequate Methodologies	The Proposed Plan complies with all applicable laws and policies. Section 302 of FLPMA states that public lands should be managed under the principles of multiple use and sustained yield "except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law." Proclamation 10285 dedicates the lands within BENM to a specific use, therefore the lands reserved within the Monument boundary must be managed in a manner that protects the objects for which the Monument has been designated. In other words, within BENM, typical multiple use management is superseded by the direction in Proclamation 10285 to protect Monument objects. Multiple uses are allowed only to the extent they are consistent with the protection of the objects within the Monument.
916-17	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Adequately Consider Impacts from Travel Management Rule [see letter for further detail and rationale]	TRAVEL01-General, DATA02-Inadequate Methodologies	As part of implementation level travel management planning, the agencies will conduct route by route analysis in collaboration with the BEC, Tribal Nations, and stakeholders, including state and local governments. Impacts from travel planning would be analyzed when travel plans are prepared in the future.
916-18	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	The agency should adequately disclose both in tabular and map form the miles of existing trails closed to OHV use.	TRAVEL01-General, DATA02-Inadequate Methodologies	See maps in Appendix A.
916-21	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Avoid Overstating the Impact of Motorized Access and Motorized Recreation on the Natural Environment [see letter for further detail and rationale]	TRAVEL01-General, DATA02-Inadequate Methodologies	Analysis contained in the Wildlife and Fisheries section in Chapter 3 incorporates the best available scientific information regarding impacts of motorized use on the natural environment.
916-9	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Adequately Identify and Address the Imbalance of Motorized Trail Opportunity in our Public Lands including State Parks, National Forest, BLM, and NPS.	TRAVEL01-General, DATA02-Inadequate Methodologies	The agencies addressed motorized and non-motorized travel in the Travel and Transportation management section in Chapter 2. The agencies also analyzed impacts to recreational users in the recreation section in Chapter 3. Additionally, the agencies will conduct travel and transportation management planning at implementation to designate specific routes.
9-2	Lisa Potter	Colorado 4x4 Girls	Yet these thousands of miles of closed trails are NOT reported /recorded to show the true percentages of road/trail closures! The percentages need to be corrected and the roads that have been closed in the past need to be counted in the percentages so it shows that percentage of our trails that have been closed, not just the current percentage that the plans propose. When areas are being reviewed in the process they MUST have accurate information in the documents. ALL existing open motorized routes must be document and shown. And for full disclosure the road that have been previously closed during other reviews should be accounted and shown as well - to show full existent of trail/road closures.	TRAVEL01-General, DATA02-Inadequate Methodologies	The existing authorized travel network is described under the affected environment and analyzed under the No Action Alternative. Specific road designations (including open, limited, or closed) are implementation-level decisions that are not addressed at the planning level in the RMP/EIS. Implementation-level travel management planning will be consistent with the management direction in the approved RMP and Presidential Proclamations 9558 and 10285.
916-13	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	The agency should adequately consider RS2477 route standing and perpetuating those routes for public motorized access and use as originally allowed by the laws and customs in place at the time of their creation.	TRAVEL01-General, DATA02-Inadequate Methodologies, DECI07-Compliance with other laws and policies	Travel management for specific routes will be completed under implementation level travel management planning. The State of Utah and its counties may hold valid existing rights-of-way (ROWs) in the Planning Area pursuant to Revised Statute 2477 (R.S. 2477), Act of July 28, 1866, Chapter 262, 8,14; Stat. 252, 253, codified at 43 USC 932. Congress repealed R.S. 2477 through passage of FLPMA. R.S. 2477 rights are determined through a process that is independent of the BLM's land use planning process. For example, the State and counties are currently asserting their R.S. 2477 claims in pending Quiet Title Act litigation against the United States. This RMP does not provide evidence bearing on or addressing the validity of any R.S. 2477 assertions and does not adjudicate, analyze, or otherwise determine the validity

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
					of claimed ROWs. The RMP (including any route closures) is subject to valid existing rights, including R.S. 2477 ROWs. Nothing in this RMP is intended to extinguish a valid existing ROW or alter the legal rights the state and counties may have to assert and protect R.S. 2477 rights. If it is determined that the State or counties possess a valid existing R.S. 2477 ROW, the BLM will clarify through appropriate mechanisms, that the management actions in this RMP are subject to that ROW.
916-4	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Adequately Address the Impacts on and Benefits of Motorized Recreation on the Human Environment [see letter for further detail and rationale]	TRAVEL01-General, DATA02-Inadequate Methodologies, REC01-General	The Draft RMP/EIS adequately analyzes a range of reasonable alternatives for OHV area designations throughout the Monument based on the best available scientific information (Section 3.5.8.2). Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM.
1681-1	Wendy Lessig	Recreational Aviation Foundation	Most, if not all, of the 18 airstrips in the BENM pre-date the passage and implementation of the Federal Land Policy Act of 1976 (FLPMA) and therefore should be grandfathered for continued use. Please keep the 18 airstrips in the BENM, including Bluff Airport and Fry Canyon airstrip, open to private, non-commercial, fixed-wing aircraft for recreational use. [Commenter includes coordinates for 18 airstrips within BENM, see table]	TRAVEL01-General, DATA03-Suggest Additional Data Source	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
916-7	CTVA Action Committee P.O. Box 5295 Helena, 59604	Capital Trail Vehicle Association	Adequately Consider and Disclose the Cumulative Impact of All Motorized Closures [see letter for further details and rationale]	TRAVEL01-General, DATA04-Cumulative Effects Analysis	Designation of areas as open, limited, or closed to OHV use is done at the land use planning level; those designations are included in the Management Actions By Alternative section in the Recreation and Visitor Services section of the Proposed Plan. Designation of specific routes are completed during implementation level travel planning. See the Travel, Transportation, and Access Management section in Chapter 3 for a discussion of impacts to access from OHV area designations. Cumulative impacts from reasonably foreseeable future actions to travel and transportation are discussed in the referenced section.
18994-2	Redge Johnson (please contact PLCPO's archaeologist, Kristopher Carambelas)		Consider how the draft EIS/RMP's alternatives designate some areas as closed to OHV travel19 which, consequently, closes historical roads and routes without completing an implementation level travel management plan or without completing either the Section 106 process or a program alternative. This unlawful action invites the same type of legal complaint as the one challenging the Richfield RMP and TMP, i.e., BLM failed to make a reasonable and good-faith effort to identify historic properties before adopting the TMP.	TRAVEL01-General, DECI02-Section 106 Consultation	43 CFR 8342.2(b) requires the BLM to designate all public lands as either open, closed, or limited to OHVs during the land use planning process (also see BLM MS-1626, Section 3.1). The EIS analyzed a range of alternatives, including the Proposed Plan, for area designations in accordance with that legal requirement (Section 3.5.8.2). The effects of those area designations are addressed in several sections of the EIS including, but not limited to, the Paleontological Resources and Geology, Water Resources, Terrestrial Habitat, (Lands with Wilderness Characteristics, Wildlife and Fisheries, Recreation, and Travel and Transportation Management sections in Chapter 3. Future implementation-level travel management planning, will provide further analysis of whether to designated routes as open or closed consistent with applicable laws, such as NEPA and the NHPA. The agencies perform Section 106 consultation during both the land use and implementation level planning processes for travel management planning. The agencies have and will continue to consult on effects determinations of travel management area designations as part of the current land use planning process. The agencies are considering effects to all historic properties (including historic roads) as a result of designating areas open, limited, or closed to OHV use.
17573-31	Sindy Smith	State of Utah, Public Lands Policy Coordinating Office	The State objects to any decision that incorporates wholesale OHV closed zones at the RMP/EIS planning stage. As is often repeated by agency staff, Travel Management, including route access, is an implementation-level decision (at least in the federal governments view). Area closures at this phase are done without proper analysis of the impacts that such a management action would have on state and county interests. The way these expansive management zones are outlined, the Agencies are essentially taking two bites at the apple by eliminating their decision space on where OHV routes will be allowed to be designated during implementation-level planning. The State again, asks for an opportunity to coordinate with the Agencies on how this alternative will impact later travel planning and how it is inconsistent with the SRMP.17 One specific SRMP provision opposes new roadless areas and similar designations that limit access.18 Here the Agencies are using travel management area designations, management zones, and special designations via LWC to limit motorized access.	TRAVEL01-General, DECI07-Compliance with other laws and policies	43 CFR 8342.2(b) requires the BLM to designate all public lands as either open, closed, or limited to OHVs during the land use planning process (also see MS-1626, Section 3.1, area designations). The EIS analyzed a range of alternatives, including the Proposed Plan, for area designations in accordance with that legal requirement. The effects of those area designations are addressed in several sections of the EIS including, but not limited to, the Paleontological Resources and Geology, Water Resources, Terrestrial Habitat, (Lands with Wilderness Characteristics, Wildlife and Fisheries, Recreation, and Travel and Transportation Management sections in Chapter 3.
18440-1	Lynne Shumway 778 N 300 W Blanding, UT 84511	San Juan ATV Safari /The Blanding Visitor Center	My mode of traveling Arch Canyon and other such places is by ATV, etc. There are many places through Bears Ears where hiking is the only way to visit. I petition you to please bare weight on the American Disabilities Act and keep such places open for all people to feel the beautiful spiritual and healing experience that the canyon has to offer.	TRAVEL01-General, DECI07-Compliance with other laws and policies	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon in a manner that protects Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18965-5	Simone Griffin	BlueRibbon Coalition	It should also be acknowledged that it is also entirely possible that many of the tribal members who wish to access sacred and cultural sites within the planning area currently or will at some point suffer from mobility impairment disabilities. Since the elimination of motorized access from the planning area would prevent disabled tribal members from accessing sacred and cultural sites, motorized	TRAVEL01-General, DECI07-Compliance with other laws and policies	See Proposed Plan, under the Tribal Co-Stewardship section in Chapter 2, for a discussion about preserving access by traditional practitioners for traditional uses within BENM. The agencies consulted with Tribal Nations and the BEC about the plan and any concerns that they have for access. See the Environmental Justice and Social and Economic Values section in Chapter 3 for discussion of impacts on

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			restrictions would likely be contrary to EO 13007, EO 13985, and AIRFA. It is clear that none of the proposed alternatives consider, let alone come even close to, hitting the mark of meeting the needs of disabled Americans. The proposed alternatives literally value dirt more highly than the needs of suffering Americans.		EJ communities from OHV area designations. See Proposed Plan under Travel Management Section for OHV management. See the Relationship to Other Plans and Policies section in Chapter 1 and Appendix B for information on the APA and compliance with other laws and policies.
18990-8	Clif Koontz		The travel management portion of the DRMP/EIS has the obvious substance and tone of a document serving to justify anti OHV decisions already made between the current administration and groups advocating the vast expansion of wilderness designation, with no or little regard for its impact on the human environment. This runs afoul of 40 CFR 1502.2(g), which states: Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made. (Emphasis added.) The very idea of assessing impacts of actions, as required by this regulation, is impossible due to a lack, to date, of any credible inventory of the Monument objects to be protected, much less an assessment and analysis of why any wholesale OHV/no- OHV area designations and other motorized travel restrictions are necessary to protect such objects, despite that the Lead Agencies have yet to analyze the individual routes that theyre preemptively closing.	TRAVEL01-General, DECIO7-Compliance with other laws and policies	Presidential Proclamation 10285 discusses resources located with BENM, with which many, but not all, constitute objects of historic and scientific interest. The agencies are preparing the RMP/EIS consistent with the protection of those resources, including the objects of historic and scientific interest. The Proposed Plan was developed based on Alternative E based on the consideration of public comments on the Draft RMP/EIS, input from cooperating agencies, Tribal Nations, government-to-government consultation, updates to best available science, and combining elements of alternatives analyzed in the Draft RMP/EIS. See the Management Actions By Alternative section in the Travel and Transportation Management section of the Proposed Plan for OHV area designations and the Travel, Transportation, and Access Management section in Chapter 3 for a discussion of impacts from OHV area designations on resources, including the objects of historic and scientific interest.
15323-7	Bill McGlynn 1711 W College St Bozeman, MT 59715	Recreational Aviation Foundation	The 2008 Monticello Record of Decision/Resource Management Plan predates the original BENM designation by 8-9 years. The Draft RMP/EIS released in 2007 proposed fly-in access to Bluff Airport, Fry Canyon, Cal Black, and Numerous old airstrips located throughout the resource area on BLM, State and private lands. Available for casual use, not maintained (see Administrative Record for List from the Utah Back Country Pilots, 3.7). The 2008 ROD/RMP removed that decision on these remote airstrips. Failure of the BLM to properly review the impact of the airstrips for the 2008 ROD/RMP reverberates all the way through how airstrips are being handled in the new Draft BENM RMP/EIS. Properly analyzing recreational use of airstrips at that time would have made recreational aviation at these remote airstrips clearly an authorized, existing use. Instead, recreational aviation stakeholders waited patiently for BLM to fulfill their promise to delineate travel management areas for remote airstrips and determine which of these will be open or closed... The next opportunity for addressing at least some of the remote airstrips came with the 2020 Bears Ears National Monument: Record of Decision and Approved Monument Management Plans, Indian Creek and Shash Ja Units. This is the planning effort that should have addressed, at least in part, the failure in the 2008 ROD/RMP regarding analyzing the impacts of recreational use of remote airstrips. Properly considering recreational use of remote airstrips in 2008 would have clearly established that use as pre-existing in the draft RMP/EIS under consideration today. Recognizing that use of remote airstrips was a clearly authorized management action in the 2020 ROD/MMPs should have clearly established recreational use of the remote airstrips as an existing authorized action in the new draft RMP/EIS, rather than requiring they be reauthorized through new implementation level processes under Proclamation 10285 as new or additional roads and trails	TRAVEL01-General, DECIO7-Compliance with other laws and policies, DATA02-Inadequate Methodologies	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3. Under BLM travel policy, designation of specific routes is an implementation-level decision, and is outside the scope of this plan. The Proposed Plan allows for consideration of new airstrips under implementation-level travel planning, which addresses the concerns raised in the 2008 Monticello ROD/RMP.
18657-66	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network. Travel management policies focused on minimizing the environmental impacts of motorized recreation have resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years which has disproportionately impacted people with disabilities. Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other human powered and quiet use forms of recreation in which many people with disabilities are unable to participate. Every time motorized routes are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever.	TRAVEL01-General, EJSOC02-EJ Populations	Additional information was added to the Environmental Justice and Social and Economic Values section of Chapter 3 to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment. The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws.
889-106	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Non-motorized users do not need to have sole exclusive access to every canyon bottom in the monument, and giving that to them is unfair and discriminatory toward motorized users and people with disabilities. The proposal to close the Arch Canyon road would effectively exclude disabled users from Arch Canyon entirely. We note that recent modifications to the Council on Environmental Qualitys NEPA regulations requires agencies to specifically identify when proposed actions will have disproportionate negative effects on environmental justice populations, which includes people with disabilities. If the agencies persist with this action, the final EIS must acknowledge that the closure of Arch Canyon will have a severe and disproportionate adverse impact on environmental justice populations per the new NEPA rules. Currently, the section of the DEIS on Environmental Justice says nothing about impacts on people with disabilities.	TRAVEL01-General, EJSOC02-EJ Populations	Additional information was added to the Environmental Justice and Social and Economic Values section of Chapter 3 to recognize the potential impacts by alternative on the ability to access motorized recreation, specifically related to potential impacts on those with mobility impairment. The Proposed Plan would manage motorized recreation in accordance with the Rehabilitation Act and other applicable laws.
701-3	Lane Palmer		Approximately 25-30% of my income is derived from conducting tours in Arch Canyon via the Arch Canyon Trail. The closure of this road would significantly impact my earnings and similarly affect many other guides dependent on this and similar routes. An additional 25-30% of my income comes	TRAVEL01-General, EJSOC03-Local Economy	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. This permit system would allow for access to Arch Canyon in a manner that protects

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			from various other trails and roads within the monument, whose future accessibility remains uncertain under the proposed plans.	(jobs, grazing, visitation, etc.)	Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future.
1810-3	Isaac Lindstrom 287 4th Ave Salt Lake City, UT 84103		Bears Ears presents an amazing opportunity to help the 18 endangered species and thousands of others by using traditional knowledge and seasonal closures to ensure that these species are protected to the best of the agency's abilities.	TRAVEL01-General, HABVEG01-Vegetation	Thank you for your comment. The agencies have utilized the best available information in developing this plan in collaboration with the BEC.
1669-3	Kurt Thams 375 Tola Ranch Road Soquel, 95073		Aviation's impact on the soundscape of Bears Ears NM is often cited as a concern, yet the reality is that aircraft noise is transient and limited to brief moments during takeoff and landing. Over the past 70 years, there have been no recorded noise complaints from backcountry aviation activities in the surrounding areas. This highlights the minimal impact that responsible aviators have on the overall experience of other land users. It is crucial to recognize that the sound of an aircraft is fleeting, unlike the continuous noise that might be generated by other activities.	TRAVEL01-General, NOISE01-General	Comment noted. While these noise-generating uses may be short-term in nature, they would affect soundscapes within BENM and are analyzed under the Proposed Plan in the Visual Resource Management, Night Skies, and Soundscapes section.
918-4	Craig Gustafson 357 W. Ridges Blvd. Grand Junction, CO 81507		it is my understanding that in over 70 years, there have been no noise complaints that originated from backcountry aviators recreating responsibly across the included areas	TRAVEL01-General, NOISE01-General, ALT07-Modification of Existing Alternatives	Comment noted. While these noise-generating uses may be short-term in nature, they would affect soundscapes within BENM and are analyzed under the Proposed Plan in the Visual Resource Management, Night Skies, and Soundscapes section.
16784-36	Kenshu Shimada 1660 International Drive, Suite 600 McLean, VA 22102	SVP	Table 2-20: As noted above in the context of off-road vehicles (ORV), OHV use can cause significant damage to paleontological resources near the surface, including those on the surface that are critical for locating sites during surveys. Furthermore, vehicular transport makes it easier for people to purposefully or unwittingly disturb fossil sites or steal material from them, particularly in the absence of increased law enforcement activities or paleontological monitoring. However, research, excavation, and mitigation of paleontological resources can require access by vehicles, especially for moving heavy equipment and/or specimens. SVP prefers alternatives that balance the need to protect BLM objects like paleontological resources from damage caused by the presence of roads and OHVs, with the need for reasonable access. Therefore, SVP prefers Alternative D.	TRAVEL01-General, PALEOGE002-Related to research communities, local communities, and visitor experience	Under the Proposed Plan, highly protected areas such as WSAs, protected LWC, and WSR, would be OHV closed. All other areas on the BLM lands in BENM would be OHV limited and OHV routes would be analyzed individually through implementation level NEPA analysis. On NFS lands, all OHVs are limited to designated motorized routes shown on the MVUM. See the Paleontological Resources and Geology section in Chapter 3 for a discussion of impacts of OHV designations on paleontological resources.
14821-1	Ken Duncan P.O. Box 1231 Flippin, 72634		As a fellow backcountry pilot in the United States for 12 years, I have seen this group of folks being the most respectful, responsible and supportive people out there !! At least a period of review with all concerned, information and perspective shared, to come to a consensus and middle ground would be in order. To lose our ability to enjoy the splendor of this great land would, indeed, be a loss and may never be reversed ! Let us please take our time, give it a concerted effort with all parties, and then find the answers !	TRAVEL01-General, PUBL01-Public and Stakeholder Involvement	The only airstrips within the Planning Area currently designated as open to motorized use, including use by aircraft, are the Fry Canyon Airstrip and Bluff Airport. Under the Proposed Plan, additional airstrips could be designated for use by aircraft in implementation level travel planning. OHVs are defined in 43 CFR 8340.0-5, and motorized aircraft are classified as an OHV when landing and taking off under BLM Agency policy (1626 – Travel and Transportation Management Manual (Public) Chapter 6.7). Landing of aircraft on NFS lands outside of a designated airstrip is prohibited without authorization and there are no designated airstrips on the NFS lands portion of BENM. Backcountry airstrip use and impacts of aircraft on the natural environment are discussed in the Natural Soundscapes and Travel, Transportation, and Access Management sections in Chapter 3.
18696-3	Julian Soncco		Limits to new climbing routes should be decided with Bears Ears Commission approval and further Tribal consultation as thousands of hiking trails desecrate sacred mountains, rocks and cultural resources. Routes should be designated alongside the Tribes for all climbers.	TRAVEL01-General, PUBL02-Bears Ears Commission	As part of implementation level travel management planning, the agencies will conduct analysis of trails in collaboration with the BEC, Tribal Nations, and stakeholders including state and local governments.
889-50	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	These roads are prime examples of how alternative D would arbitrarily close extremely valuable roads that provide important connectivity to areas outside of the Bears Ears National Monument. They provide the only access to the remote Imperial Valley area of the Glen Canyon National Recreation Area and are authorized routes within the NRA under its travel management plan. Just as with roads that cross into Canyonlands, the BLM and Forest Service must closely coordinate with the National Park Service on any management actions with respect to these routes to ensure that they are managed consistently across agency boundaries.	TRAVEL01-General, PUBL03-Monument Advisory Committee	Under the Proposed Plan, much of the land bordering Canyonlands National Park is OHV closed, which responds to the NPS need to protect soundscapes and visual resources. However, some locations, including the routes leading to Elephant Hill, were designated as OHV limited in order to preserve access to NPS lands for permitted opportunities. Lands adjacent to Glen Canyon National Recreation Area are generally OHV limited, which responds to the NPS need for access to road and trail opportunities provided on NPS lands. Some routes within Beef Basin adjacent to NFS lands are within OHV closed areas in order to protect BENM objects.
889-105	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	It is critical for the agencies to consider not just whether some hikers want exclusive access to Arch Canyon, but the overall recreational balance across the monument. Hikers and backpackers already enjoy exclusive access to the vast majority of canyon bottoms throughout Cedar Mesa and the remainder of Bears Ears National Monument. In the the surrounding area near Arch Canyon, hikers and long distance backpackers already have exclusive access to Mule Canyon, Fish Canyon, Owl Canyon, Road Canyon, the entire Grand Gulch canyon complex, and the entire Dark Canyon complex, all of which are either in designated wilderness or wilderness study areas which prohibit motorized and mechanized use. All of the other canyons of Cedar Mesa are available for multi-day backpacking trips, while Arch Canyon is essentially the ONLY Cedar Mesa canyon with a road at the bottom accessible to motorized vehicles. ²⁷ It therefore also is the only Cedar Mesa canyon accessible to people with disabilities and those who are incapable of hiking long distances over rough terrain. Taking Arch Canyon away from motorized users in order to give it exclusively to hikers and backpackers therefore makes no sense, as such action would only make recreational opportunities within the monument less balanced and would tip the scales even further in favor of non-motorized users than they already are.	TRAVEL01-General, REC01-General	The Draft RMP/EIS analyzed an adequate range of alternatives for OHV area designations throughout the Monument. Under Alternative E, the areas managed for wilderness characteristics would be managed as OHV-limited. There are no OHV-open areas in BENM under any of the alternatives, meaning that, for all alternatives, vehicle access, including OHVs/mechanized, would be limited to designated routes unless otherwise required for administrative use. The BLM and USDA Forest Service will develop an implementation-level travel management plan that will be guided by the landscape-scale management direction provided in the RMP/EIS. The implementation-level travel management plan will assess existing motorized/mechanized trails and routes, as well as future needs and opportunities regarding motorized/mechanized trails and routes.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
889-111	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	We submit that when it comes to motorized recreation in the Bears Ears National Monument, the vast majority of alleged user conflict consists of social values conflict rather than interpersonal conflict. On the whole, motorized and non-motorized recreation are already well-separated, and there are relatively few instances of non-motorized and motorized users sharing the same routes in any significant numbers. While interpersonal conflict between motorized and non-motorized recreationists is rare, social values conflict is endemic in the area, as evidenced by the decades long battles over Wilderness designations and endless litigation over motorized travel management plans throughout Utah. Anti-motorized groups have made it quite clear that they are ideologically opposed to virtually all motorized recreation in Utah, and they try to get motorized trails closed wherever possible. Specious claims of user conflict are but one tool in their toolbag. We maintain that social value conflict is a wholly inappropriate basis for the agencies to close motorized routes, and that any analysis or actions taken based on user conflict must be based solely on specific documented instances of interpersonal conflict. The agencies have a responsibility to manage American public lands for the benefit of all Americans, rather than catering to a few narrow-minded anti-motorized bigots.	TRAVEL01-General, REC01-General	The Proposed Plan, and later implementation-level travel management planning, does and will continue to consider the body of research on recreation conflict, including review by the Congressional Research Service, which documents interpretation of the interchangeability of "use" and "user" related to this topic as grounded in BLM policy handbooks 1221-2, 2930-1 and 8320-1, through rulemaking in 67 FR 61732, and documented in other associated guidance.
1512-4	Art Hanson		I strongly urge you to implement a zoned approach to recreation management to help concentrate use and development for recreation where it is most appropriate to protect the monument.	TRAVEL01-General, REC01-General	The Proposed Plan employs a zoned approach to recreation management.
18657-16	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	This alternative proposes to manage all areas of BLM lands within the monument found to have wilderness characteristics as BLM Natural Areas managed for wilderness characteristics and closed to motorized use. This provision alone would have a devastating effect on motorized recreation within the monument, as it would mandate the closure of all existing primitive roads that were classified as ways within lands with wilderness characteristics rather than roads, which is largely a distinction without a difference. Hundreds of miles of valuable roads would be arbitrarily closed, with the agencies having no discretion to keep open roads that access important destinations or provide exceptional recreational experiences. Routes that were classified as roads and were thus excluded from inventoried lands with wilderness characteristics or cherry-stemmed through them would be spared from mandatory closure but would likely be closed in subsequent travel planning because of alleged negative effects on adjacent lands managed for wilderness characteristics. And that is only in the BLM portions of the monument. The wilderness characteristics allocations and concomitant OHV-closed area designations in Alternative D would guarantee the closure of many of the most valuable class D roads in the monument, including the end of the Chicken Corners Jeep Safari Trail, numerous spur routes off Lockhart Basin Road, all of the roads in the Imperial Valley area of Beef Basin including critical connecting routes that provide the sole access to designated motorized routes inside the Glen Canyon National Recreation Area, Moqui Canyon, Mikes Canyon, Lavender Mesa, and many others. The popular Arch Canyon road would also be closed in this alternative.	TRAVEL01-General, REC01-General	The Draft RMP/EIS analyzed a range of alternatives for OHV area designations throughout the Monument. The named roads listed in the comment are within OHV limited areas under the Proposed Plan meaning that they would retain their current designation subject to future implementation-level travel management planning. Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon Sub-Area would be allowed with a permit. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18657-20	Loren Campbell 529 E Entrada Dr Virgin, UT 84779	Utah Public Lands Alliance	The hundreds of miles of motorized route closures mandated by this alternative would not only affect OHV enthusiasts, but every other recreational group that depends on motorized access to reach recreation destinations adn trailheads within the monument. With so many areas managed for wilderness characteristics and off limits to vehicles, the more remote parts of the monument would become basically inaccessible for all forms of recreation, as it would require backpacking dozens of miles over multiple days just to reach these areas. Day hikers, rock climbers, horseback riders, and mountain bikers would all have their ability to recreate within the monument severely curtailed. No user group would be left unharmed by the decimation of the road network proposed in alternative D. Even the tribal groups that are pushing for the most restrictive management options would be severely harmed by this alternative, as they too ultimately depend on motorized vehicles to access most of the monument. Unless they were somehow exempt and allowed to drive on roads that had been closed and managed as de facto wilderness, they would be unable to access many cultural sites important to them.	TRAVEL01-General, REC01-General	See the Management Actions By Alternative section in the Travel and Transportation Management section of the Proposed Plan for OHV closed area designations. The Proposed Plan would designate 637,615 acres as OHV closed. There would be 32 miles of designated routes within OHV closed areas under the Proposed Plan. See the Recreation and Visitor Services section in Chapter 3 for a discussion of impacts to recreation users from OHV area designations.
18713-3	Gavin Noyes 823 E 13th Avenue Salt Lake City, UT 84103	INDIGENOUS LED	Efforts to close Arch Canyon to motorized vehicles have been advocated by Utah Din Bikyah, Ute Mountain Ute Tribal Members, and others since 2010. There seem to be significant safety concerns, negative ecological stream impacts, beaver dam disruptions, and possible archaeological site damage from vehicles. There is also regular trespassing and parking on Ute Mountain Ute allotted lands as well as noise and safety concerns from rifle target practice, alcohol, and inappropriate verbal and social behaviors from visitors. Arch Canyon should be closed to motorized vehicles, and should be managed for conservation and respected by all who enter. This is an ideal hiking or horse packing trail to recognize Ute history.	TRAVEL01-General, REC01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit in a manner that protects Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future. The BLM looks forward to working with the Ute Mountain Ute and the other tribes of the BEC on implementation level RAMPs, which could address some of the issues referenced in the comment through permit allocations, timing restrictions, or group size limitations. The RAMP could also address strategies to better inform visitors about staying on public land and avoiding trespass, including unauthorized camping on Ute Mountain Ute allotted lands.
613-2	Terri and Michael Liechty		We want to continue with public use and access to places like Arch Canyon, and we feel that it's there for our use, not for government closing it down. We don't own horses, and to show our grandchildren the canyon, we have to have four-wheelers in there.	TRAVEL01-General, REC01-General	Under the Proposed Plan, motorized and non-motorized use in the Arch Canyon RMZ would be allowed with a permit. The permit system would be developed as part of the BENM Travel Management Plan in the future.
18238-54	Chaitna Sinha		Implementation-level travel planning would not designate new non-motorized or non- mechanized routes in degraded riparian, wetland, and water resources unless necessary to ensure the protection of BENM objects. Id., p. 2-122. This prescription should include additional resources (taken from redundant prescriptions, below), and clarify actions that the agencies will take regarding trails that	TRAVEL01-General, REC01-General, ALT05-Alternative E	The Proposed Plan in Section 2.4.21.3 reads as follows: "Implementation-level travel planning would not designate new motorized and mechanized routes in the following areas unless necessary to ensure the protection of BENM objects, public safety and in collaboration with the BEC: Riparian areas Wetlands Water resources, including 100-year floodplains, and perennial springs and seeps where monitoring has

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			are impacting these resources. Also, including non-mechanized is unnecessary because, as we explain above, no new mechanized trails should be designated in BENM. We propose: Implementation-level travel planning, in collaboration with the BEC, will not designate new non-motorized trails in sensitive soils, riparian areas, wetlands, 100-year floodplains, perennial springs and seeps, and other water resources where monitoring has shown degradation to these resources, unless absolutely necessary to ensure the protection of BENM objects and values. New non-motorized trails are those that may exist on the ground but that are not designated in the 2008 Monticello Resource Management Plan, the 1991 Manti-LaSal Travel Plan, or other implementation-level planning document. The designation of new non-motorized trails will be in accordance with the relevant recreation management zone. Existing trails that are impacting Monument objects and values, including sensitive soils, riparian areas, wetlands, 100-year floodplains, perennial springs and seeps, and other water resources, will be closed, modified, or re-routed, and as necessary the area will be rehabilitated, to protect and restore these resources.		shown degradation. Crucial big game habitat Big game fawning/calving habitat Sensitive soils Implementation-level travel management planning would ensure motorized and mechanized routes that parallel or cross streams would be located to protect best complement riparian and aquatic ecosystems as well as road/trail and stream geometry. This includes locating crossings (fords) at points of low bank slope and firm surfaces wherever practicable. Existing trails would be maintained as necessary to protect BENM objects. See Appendix H: Travel Management Plan Criteria." The Proposed RMP/ Final EIS already contains language regarding the prohibition of new non-motorized and non-mechanized trails in areas of sensitive soils unless necessary for the protection of BENM objects (in Section 2.4.21.3), in addition to the language cited in this comment regarding the protection of riparian, wetland, and water resources.
8999-14		International Mountain Bicycling Association	Providing access, and public appreciation to the objects contained within the boundaries that warrant this monument is just one of them but likely the most important method of how these landscapes relate and create value for the public. Without diverse, sustainable and compatible recreation, the public might cease to support these designations. Therefore, we provide our comments as a perspective that is shared by many across the country and as a desire by our members to experience wild places via the efficient and sustainable transportation by bicycle. This perspective is that bicycle use on trails and rural remote dirt and gravel roads on public lands is an appropriate and sustainable activity that should be provided for in ample supply due to its inherent sustainability. Recreational trails, such as those authorizing bicycle use, are effective tools for conservation of natural resources. Trails direct people onto planned and managed linear features that have been designed to avoid and minimize impacts to the extent possible and minimize unauthorized off trail impacts that might occur where demand exists yet trails may lack.	TRAVEL01-General, REC01-General, ALTO7-Modification of Existing Alternatives	Mechanized travel would be allowed on designated OHV routes and on trails specifically designated for mechanized use under the Proposed Plan.
8999-5		International Mountain Bicycling Association	The BLM should employ the e-bike definitional exclusion from the motorized classification, as provided at 43 CFR 8340.0-5(a), for the purposes of authorizing e-bikes (or e-mountain bikes) on non-motorized trails within the Monument or designate OHV limited trails for e-bike use where the motorized use is limited to class 1 ebikes. Either scenario, the number of trails designated specifically for bikes and e-bikes should be increased to meet the public need to access more remote locations and escape crowds and to provide an experience that is being sought out by visitors to Utahs National Monuments like the BENM.	TRAVEL01-General, REC01-General, ALTO7-Modification of Existing Alternatives	Under the Proposed Plan, OHV use, including e-bikes per 43 CFR 8340, would be limited to designated roads and trails designated for such use, and thereby providing recreation opportunities in BENM. The agencies will designate specific routes as OHV open, limited, or closed to OHV use as part of implementation level travel planning. The BLM has developed an Information Memorandum, Management and Use of Electric Bikes on BLM-managed Lands IM 2023-051, to establish policy concerning the use of e-bikes on BLM land and to implement the final e-bike rule. The BLM will comply with Management and Use of Electric Bikes on BLM-managed Lands IM through implementation level travel planning.
9372-24	Josh Nielson 913 N 240 W Blanding, UT 84511	Sunrise Outfitting	The management plan mentions often that there are plans for increased traffic. Yet, the plan for increased traffic seems to be the closure of more use and more areas. If all the visitors to the monument are funneled to fewer, hardened sites, those sites will experience high levels of traffic and will be at risk for higher exposure. On the contrary, allowing users to spread out further will help to alleviate that potentially destructive impact.	TRAVEL01-General, REC02-Visitation and Visitor Experience	The agencies are planning for increased visitation to BENM and to preemptively protect Monument objects against the impacts of higher levels of visitation. The range of alternatives includes differing management strategies to protect Monument objects from high visitation. However, under all alternatives, users will not be prohibited from exploring beyond more developed areas of the Monument. Specific decisions on roads and trails will occur during implementation-level travel management planning.
8928-1	Donald Simonis		Site visitation management should: 1)require permits to visit the more popular sites, not just Moon House. 2)limit the number of permits to the popular sites. 3)close selected sites to visitation except for Tribal/Government approved guided tours. 4)close selected sites to visitation except for Tribal/Government approved activities.	TRAVEL01-General, REC02-Visitation and Visitor Experience, ALTO7-Modification of Existing Alternatives	The Cedar Mesa and San Juan River permit systems cover several thousand known sites, including several of the most popular and heavily visited sites. The Proposed Plan allows for creation of other permit systems to protect Monument Objects. See Appendix E (Recreation) for implementation level decisions related to permits in Management Areas and Sub-Areas.
17358-3	Ramona Blaber Oak Park, IL	Sierra Club	I watched a child on a ATV systematically smash a girls of flowering prickly pear while the parents drank beer and target practiced. Very disturbing to view and not to be able to do anything about it. Please restrict use .	TRAVEL01-General, SHOOT02-in favor of shooting closures	Under the Proposed Plan, motorized and non-motorized mechanized vehicle use would be allowed only on roads and trails designated for such use, consistent with the protection of BENM objects. Proclamation 9558 (incorporated by reference into Proclamation 10285) limits designation of new routes within BENM to those needed public safety or protection of BENM objects. The Proposed Plan does not have any areas designated as OHV open. See the Water Resources, Vegetation, Soil Resources, and Cultural Resources sections in Chapter 3 for a discussion of impacts on the resources provided in the comment from OHV use.
889-101	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	Even as described in the DEIS, the levels of sedimentation and pollutants in Arch Creek attributable to vehicles are miniscule and temporary, increasing to notable levels only during events with significant vehicle traffic and decreasing immediately afterward. After looking at the same data the DEIS now uses to justify closing the road, the BLM in 2010 concluded, Because the BLM assessments found the riparian area in Arch Canyon to be Properly Functioning, the Riparian Resources Staff Report concludes that motorized vehicle use along the designated route within Arch Canyon is not causing and is not expected to cause adverse effects to the riparian resources in the canyon.22 The aforementioned Riparian Resources Report was even more explicit that the road is not impacting water quality, stating: According to the BLM May 2007 PFC assessment (Prichard et al.), it was found that even though the road crosses the stream 60 times, there were little to no impacts to the riparian areas because most of the road length is on the higher terraces and most of the crossings are at a right angle to the channel. This is also supported by Aubry's 2003 report on water quality monitoring	TRAVEL01-General, WAT01-General, DATA03-Suggest Additional Data Source	The Proposed Plan does not have a closed area designation for OHV use in Arch Canyon. All motorized and non-motorized use within Arch Canyon would require a permit in order to ensure protection of Monument objects. The permit system would be developed as part of the BENM Travel Management Plan in the future.

Letter and Comment	Sender Name	Organization	Public Comment	Comment Code	Comment Response
			at Arch Canyon during the ATV Safari. Additional monitoring reports by Aubry in 2007, 2009, and 2010 also conclude that motorized use along the road in Arch Canyon is not causing adverse effects to water quality.23		
889-100	Patrick McKay 5563 Sydney Place Highlands Ranch, CO 80130	Colorado Offroad Trail Defenders	And while the DEIS makes much of a minor increase in sedimentation from vehicles crossing during a permitted event, the Fisheries Report attached to the BLMs 2010 petition denial found that the effects on water quality and fisheries from natural flash flooding dwarfs sedimentation from vehicle travel, stating: The frequent flash flood events that characterize this desert stream system carry high sediment loads which can naturally scour the stream channel in higher gradient areas and result in deposition of fine sediment in lower gradient areas.... The isolated disturbances to fish habitat as a result of motor vehicle crossings in Arch Canyon is minimal compared to the natural alteration associated with these flashy systems. Closing the road is not expected to create additional aquatic habitat but could result in isolated improvements to existing habitat.21	TRAVEL01-General, WAT01-General, DATA03-Suggest Additional Data Source	See changes to Chapter 3 in the Wildlife and Fisheries section for impacts to wildlife from visitation in Arch Canyon. Also see the Proposed Plan Changes for Arch Canyon.
1817-2	Michele Dieterich 2099 Silver Ridge Rd Hamilton, 59840		All existing climbing routes should be analyzed for environmental effects. Raptor nests should be considered and routes within 1/2 mile of nests should be removed.	TRAVEL01-General, WILDFISH04-Special Status Species (includes Proclamation 10285 and/or 9558 Species, migratory birds, and raptors), REC01-General	The agencies will conduct thorough environmental assessments and consider the presence of raptor nests and other sensitive habitats when managing recreational activities including the evaluation of climbing routes and their potential impacts on wildlife and habitat integrity. Routes that are found to significantly impact raptor nests or disturb nesting activities may be subject to management actions, including relocation or seasonal closure, or closure, to mitigate potential impacts.
18082-44	Shannon Snyder, Melissa McCoy 1595 Wynkoop St. Denver, CO 80202	U.S. EPA Region 8; U.S. EPA Region 8	The Draft EIS states that OHV use within areas designated as OHV limited on BLM lands will be managed according to the 2008 Monticello RMP, 2008 Moab RMP, and subsequent travel decisions, until or unless new implementation-level travel planning is completed. Given the age of those analyses, and the fact that these decisions were before the Monument was established, it is unlikely those decisions were designed to prioritize the protection of Monument ROVs. We recommend the chosen alternative includes a commitment to complete travel management planning for the Monument within a specific timeframe after the ROD is signed. This is needed to prioritize the protection and restoration of Monument ROVs.	The Proposed Plan includes a management action of preparing an updated Travel Plan within 5 years (see Section 2.4.19.2).	The Proposed Plan includes a management action of preparing an updated Travel Plan within 5 years in the Management Actions Common to all Action Alternatives section in the Travel and Transportation Management section in Chapter 2.

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