



OUTDOOR ALLIANCE



July 29, 2016

The Honorable Rob Bishop
123 Cannon House Office Building
United States House of Representatives
Washington, D.C. 201515

The Honorable Jason Chaffetz
2236 Rayburn House Office Building
United States House of Representatives
Washington, D.C. 201515

Dear Congressmen Bishop and Chaffetz,

Access Fund, Outdoor Alliance and Outdoor Industry Association (OIA) have represented outdoor recreation and business communities during the process to develop a meaningful, well-balanced *Utah Public Lands Initiative* (PLI) that aligns with our core values. Representatives from our organizations attended the recent Public Listening Session (July 16, 2016) in Bluff, Utah to listen to diverse stakeholders in order to further develop our understanding of the complex issues associated with protecting the Bears Ears region of southeastern Utah as well as the seven Utah counties affected by the PLI. In fact, the entire Access Fund policy team, including their executive director, policy director, senior policy advisor and Native Lands coordinator, spent 3 days meeting with local climbers and elected officials, discussing recreation management with Secretary Jewell and other land managers, and listening to the spectrum of concerns shared by local stakeholders including local climbers, San Juan county residents and the Native American community. We have spent countless hours considering potential paths forward and have maintained our ability to critically evaluate options for protecting climbing access, honoring our Native American partners, and conserving the environment at the local and regional scales.

It is clear from the Public Listening Session that nearly all stakeholders support some form of permanent protection for the Bears Ears region that allows traditional uses and recreation access. Unfortunately, it is also evident that land managers are not provided the resources necessary to properly manage recreation, protect historical and archaeological resources and preserve ecological integrity. We wholeheartedly support appropriation of additional funding for law enforcement, resource protection and recreation management for the greater Bears Ears area.

We appreciate that the PLI (H.R. 5780), introduced on July 14, 2016, reflected some of the outdoor recreation community's comments on the draft legislation such as an Indian Creek National Conservation Area, Wild and Scenic Rivers (357 miles of the Green, Dolores, San Juan and Colorado Rivers) and in particular some boundary adjustments to address potential management challenges related to climbing at Bridger Jack Mesa, Mexican Mountain, and San Rafael Reef. However, we believe that the PLI still needs considerable work since additional provisions were included in the latest version that would weaken protections for recreation, the environment and the growth of the recreation economy. We maintain hope that a legislative process could find the right balance for managing our federal public lands, honor Native American values, protect recreation resources and the recreation economy in gateway communities, and provide landscape-scale conservation measures. Nonetheless, we cannot support the PLI (H.R. 5780) at this time for the following reasons:

1) The PLI (Division C, Title I) Planning and Implementation Committee is not sufficiently well-balanced, does not adequately include the entire spectrum of recreation interests, and is predisposed to decisions that favor development and resource extraction over conservation and protection of cultural and recreation resources. It is important to note that Utah’s recreation economy contributes \$12 billion in consumer spending, employs 122,000 Utahans and brings in \$856 million in state and local tax revenue.

2) The PLI proposes transfer of federal lands to the state of Utah that could negatively affect the environment, recreation access, the integrity of National Park viewsheds and air quality, and quality of life of neighboring communities. In particular, the PLI proposes a very large consolidation of School and Institutional Trust Land Administration (SITLA) lands just northwest of Moab, Utah that has a high likelihood of facilitating intense industrial development and cause environmental impacts detrimental to the recreation community and quality of life for Grand County residents.

3) The PLI (Division B, Title XI) provides the state of Utah control over energy leasing decisions and will conflict with the Moab Master Leasing Plan—a plan that Access Fund, Outdoor Alliance and Outdoor Industry Association wholeheartedly support because it brings better balance and certainty to energy development.

4) The PLI favors some land management strategies that are not informed by currently accepted land management best practices. For example, PLI grazing and snowmobile prescriptions do not follow well-substantiated, sustainable resource management approaches.

5) The PLI (Division B, Title XII) RS 2477 provisions prematurely address state rights-of-way before the courts resolve such claims that are the subject of extensive on-going litigation.

In addition, we do not support the “PLI Partner Act” (H.R. 5781) that limits the use of the Antiquities Act—a tool that has been used effectively for over a century to conserve lands when no other alternatives were available.

As a general principle, we prefer a legislative approach that assimilates input from all stakeholders, but we now acknowledge that this type of solution is currently unlikely given the divided political climate, the many improvements still needed in the PLI, and limited timeframe left in the One Hundred-Fourteenth United States Congress. Given these challenges, the Access Fund, OIA and Outdoor Alliance believe that the declaration of a National Monument at Bears Ears would provide realistic, long-term protections for key lands in San Juan County, which are of very high significance to the climbing and Native American communities. Accordingly, we will continue to represent the outdoor recreation community and work toward viable conservation for eastern Utah whether through the PLI or designation of a national monument, or even a hybrid approach for the seven Utah counties (Carbon, Duchesne, Emery, Grand, San Juan, Summit, and Uintah) addressed in H.R. 5780. We support long-term protections for the Bears Ears region specifically by the end of 2016.

We may provide additional comments regarding the PLI as key provisions are modified.

* * *

Eastern Utah includes world-class outdoor recreation opportunities, unique ecological values and Native American ancestral treasures. While H.R. 5780 would provide some protections for this exceptional landscape, it does not provide enough to protect recreation assets for future generations. As such, we will continue to work

with both the Congress and the Administration toward appropriate, durable protections for eastern Utah's incredible public lands.

Sincerely,

Handwritten signature of Brady Robison in black ink.

Brady Robison, Executive Director, Access Fund

Handwritten signature of Adam Cramer in black ink.

Adam Cramer, Executive Director, Outdoor Alliance

Handwritten signature of Amy Roberts in black ink.

Amy Roberts, Executive Director, Outdoor Industry Association

Cc: The Honorable Sally Jewell, Secretary, Department of Interior
The Honorable Robert Bonnie, Under Secretary for Natural Resources and Environment, USDA