

# OUTDOOR ALLIANCE

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BLM Planning Team,

On behalf of the human-powered outdoor recreation community, thank you for the opportunity to provide input on the Draft Resource Management Plan (RMP) and Environmental Impact Statement (DEIS) for the Bears Ears National Monument (BENM). The BENM landscape includes numerous high-quality opportunities for hiking, climbing, canyoneering, mountain biking, paddling, and other forms of outdoor recreation that allow members of our community to develop a deep and lasting connection to BENM, not just for its recreation potential, but also for its extraordinary conservation and cultural values. To this end, we are pleased to support Alternative E, which maximizes input from Tribal Nations, with necessary modifications and clarifications to address recreation management.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

The outdoor recreation community is deeply invested in the BENM landscape, having campaigned in support of the Monument's designation in 2016, as well as the restoration of its original boundaries in 2021. For over a decade, recreationists have worked in collaboration with Tribal Nations and conservation advocates to secure lasting protections for BENM, and we are committed to continuing this work to steward these lands into the future alongside the Bears Ears Commission (BEC),



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the Bureau of Land Management, and the USDA Forest Service. Our comments are intended to help set land managers up for success in providing recreation access while providing strong, durable protections for BENM objects.

The Draft RMP is a historic milestone for tribal co-management on federal public lands, and one that we hope sets a strong precedent for future co-management agreements. We especially appreciate that the Draft RMP (and particularly Alternative E) creates new pathways for visitors to understand and respect the outstanding cultural values of the BENM landscape. We are grateful that Alternative E preserves most existing human-powered outdoor recreation access, including for climbing routes, paddling on the San Juan River, and for biking trails, while providing strong protections for the landscape's conservation and cultural values.

Because Alternative E represents a new management paradigm for public lands, there are elements of the plan that deserve further explanation and others that should be modified to better address sustainable recreation. Our high level requests for changes and clarifications in Alternative E include:

- Clarify when and under what circumstances areas can be closed to recreation, what adaptive management options may be employed to help prevent loss of access, and articulate other management strategies to address recreation impacts where possible;
- Provide more information about resource rest periods and how these rest periods will be developed and implemented;
- Update the Zone descriptions to allow for special recreation management to apply in areas of high recreational use, especially in Indian Creek;
- Increase flexibility for land managers to address resource impacts, including through adaptive management, in the Remote and Outback Zones;
- Reconsider or remove the requirement that day use visitors to BENM acquire a permit;
- Ensure that the authorization process for fixed climbing anchors is workable and will allow for new route development that does not harm environmental or cultural values;
- More clearly describe future planning processes; and
- Better distinguish between motorized and mechanized users.

These and other comments are outlined in more detail below.



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## 1. Outdoor Recreation in BENM

BENM contains numerous high quality recreation destinations ranging from roadside viewpoints to remote canyons. For climbers, the area includes Indian Creek—a globally famous climbing destination that attracts thousands of climbers each year—as well as more remote, lesser-traveled climbing destinations that are scattered throughout the Monument.<sup>1</sup> For paddlers, the upper<sup>2</sup> and lower<sup>3</sup> San Juan River offer popular Class II-III multi-day runs totalling nearly 90 miles and traveling through spectacular canyon scenery with side hikes, cultural sites, and family friendly whitewater. The Monument also borders the Colorado River through Meander Canyon<sup>4</sup> which serves as the gateway to Cataract Canyon<sup>5</sup> and the confluence of the Colorado and Green Rivers. In addition to self-organized river trips on the San Juan River and Colorado River, there are also numerous rafting outfitters that provide a wide range of rafting trips on these rivers, including indigenous owned, Ancient Wayves, which provides trips on the San Juan River. Trail systems throughout BENM provide access for hikers and mountain bikers to lesser traveled areas of the BENM landscape, which provide a remote, undeveloped recreation experience in contrast with the more developed recreation infrastructure at nearby national parks. These recreation opportunities support a tourism industry in the communities surrounding BENM and also support Utah’s thriving outdoor recreation economy, which produced \$8.1 billion in economic output and supported more than 71,000 jobs in 2022.<sup>6</sup>

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

<sup>1</sup> Other climbing areas within BENM include Arch Canyon, Valley of the Gods, Harts Draw, Lockhart Basin, and Comb Ridge.

<sup>2</sup> American Whitewater, *San Juan 01. Sand Island to Mexican Hat (Upper San Juan)*, <https://www.americanwhitewater.org/content/River/view/river-detail/1871/main>.

<sup>3</sup> American Whitewater, *San Juan 02. Mexican Hat to Clay Hills Crossing (Lower San Juan)*, <https://www.americanwhitewater.org/content/River/view/river-detail/3558/main>.

<sup>4</sup> American Whitewater, *Colorado 17. Moab to Green River Confluence*, <https://www.americanwhitewater.org/content/River/view/river-detail/11344/main>.

<sup>5</sup> American Whitewater, *Colorado 18. Colorado/Green Confluence to Hite Marina (Cataract Canyon)*, <http://www.americanwhitewater.org/content/River/view/river-detail/1842/main>.

<sup>6</sup> U.S. Bureau of Economic Analysis, BEA 23-54, Outdoor Recreation Satellite Account, U.S. and States, 2022 (2023).



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visitors experience and appreciate protected objects. 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. Proclamation 9558 states that:

“The area contains numerous objects of historic and of scientific interest, and it provides world class outdoor recreation opportunities, including rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding. Because visitors travel from near and far, these lands support a growing travel and tourism sector that is a source of economic opportunity for the region.”<sup>7</sup>

Similarly, Proclamation 10285 reaffirms the importance of outdoor recreation to the BENM landscape while also noting specific areas of the landscape that support recreation:

“The area contains numerous objects of historic and scientific interest and also includes other resources that contribute to the social and economic well-being of the area’s modern communities as a result of world-class outdoor recreation opportunities, including unparalleled rock climbing available at places like the canyons in Indian Creek; the paradise for hikers, birders, and horseback riders provided in areas like the canyons east of Elk Ridge; and other destinations for hunting, backpacking, canyoneering, whitewater rafting, and mountain biking, that are important to the increasing travel- and tourism-based economy in the region.”<sup>8</sup>

Both proclamations make clear that providing sustainable recreation access—where it does not unduly harm protected objects—is in line with the intent of BENM’s designation as a national monument.

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<sup>7</sup> Proclamation 9558 of December 28, 2016, Establishment of the Bears Ears National Monument, 82 Fed. Reg. 3, 1139 (Jan. 5, 2017), *available at* <https://www.govinfo.gov/content/pkg/FR-2017-01-05/pdf/2017-00038.pdf>.

<sup>8</sup> Proclamation 10285 of October 8, 2021, Bears Ears National Monument, 86 Fed. Reg. 197, 57321 (Oct. 15, 2021), *available at* <https://www.govinfo.gov/content/pkg/FR-2021-10-15/pdf/2021-22672.pdf>.



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## 2. Support for Alternative E with Modifications

Outdoor Alliance supports Alternative E with modifications and clarifications noted below in Section 3 of these comments. 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.

Alternative E differs significantly from other BENM alternatives in several ways. Notably, for the most part, many traditional BLM and USFS land use designations are not used, and the BENM landscape would instead be managed using four landscape level zones. We generally support this zoned approach, although we request modifications to some zones in Section 3(B) below to address anticipated management needs to allow for sustainable outdoor recreation.

We appreciate that, for the most part, existing access for human-powered recreational activities is maintained, although decisions to close areas to recreation could be made through future implementation-level planning. Notably, existing climbing routes remain open, and climbers could continue to replace existing fixed anchors without a permit. Paddlers would continue to enjoy permitted access to the San Juan River. Trails used by mountain bikers would remain open, although these could be closed through future travel management planning. We support components of Alternative E that would encourage visitors to recreate using Leave No Trace principles, as well as encouraging visitors to stay on existing trails.

Most importantly, Alternative E would create new pathways for recreationists to understand the cultural and scientific values of the BENM landscape through permitting systems, educational materials, and other means. Building a better understanding of these cultural values will help visitors to recreate in a manner that respects cultural and spiritual resources and protects BENM objects. We look forward to collaborating with the agencies and Tribal Nations to support implementation of these aspects of the plan.



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## 3. Suggested Modifications and Areas for Clarification:

While we generally support Alternative E, we have numerous questions and suggested improvements related to recreation management. These are described under the high-level themes identified in the sections below.

### A. Potential Closures and Resource Rest

While, for the most part, the draft RMP does not close specific areas of BENM to recreational use, it leaves open the possibility that most recreational activities could be subject to closures, especially in situations where the agencies and the BEC determine that recreational use is negatively affecting BENM objects. 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



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- Closures should be reviewed regularly and provide for monitoring and adaptive management to allow for reopening areas to recreation in light of changed conditions.

Integrating these principles into the Final RMP will ensure that BENM management aligns with the proclamation's emphasis on the landscape's recreational values.

The Draft RMP describes multiple scenarios where land managers might close areas of BENM to recreational use. In many cases, Outdoor Alliance supports closures as a management strategy within BENM, such as for ceremonial activities by Tribal Nations,<sup>9</sup> or seasonal climbing closures to protect nesting raptors,<sup>10</sup> where the purpose of the closure is clearly targeted to address a specific recreational impact. 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,<sup>11</sup> closures of dispersed campsites,<sup>12</sup> closures to protect biological soil crusts,<sup>13</sup> and closures to protect big game habitat.<sup>14</sup> 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,<sup>15</sup> closures of recreation areas,<sup>16</sup> and closures of climbing routes.<sup>17</sup> The DEIS provides little detail about the timing, extent, and duration of these resource rest periods, which could

<sup>9</sup> DEIS page 2-61.

<sup>10</sup> DEIS page 2-84.

<sup>11</sup> DEIS page 2-104.

<sup>12</sup> DEIS page 2-83.

<sup>13</sup> DEIS page 2-17.

<sup>14</sup> DEIS page 3-415.

<sup>15</sup> DEIS page 2-08.

<sup>16</sup> DEIS page 3-429.

<sup>17</sup> DEIS page 2-84.



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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.

## B. Alternative E Zones

Alternative E would remove most existing recreation management designations, such as Special Recreation Management Areas, from BENM and instead manage the entire landscape in four zones—Front Country, Passage, Outback, and Remote—with varying levels of recreational infrastructure.<sup>18</sup> We generally support this framework for managing BENM, though we request that BLM modify some aspects of the individual Zones to allow land managers increased flexibility to manage recreational use.

The vast majority of BENM is covered by the Outback and Remote Zones, which allow for minimal recreation infrastructure and, for the most part, would preserve the natural condition of the landscape. While this management framework is appropriate for many portions of BENM (much of which is far from paved roads and developed trailheads), we question whether some of the limitations on future management (particularly in the Remote Zone) are too restrictive to allow for an appropriate response to foreseeable future management challenges. For example, the DEIS provides that “[n]o new sites/facilities/trails would be developed in the Remote Zone; existing trails could be designated through implementation-level

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<sup>18</sup> Alternative E retains the Moon House RMZ and elements of the San Juan River SRMA.



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planning where consistent with protecting BENM objects.”<sup>19</sup> We interpret this statement to prohibit all new recreational infrastructure in the Remote Zone, which could preclude infrastructure needed to rehabilitate backcountry recreation sites or address other recreation impacts. 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.

In addition to the overarching restrictions on recreation facilities present within each zone, Alternative E would also designate the entire BENM landscape as either Visual Resource Management (VRM) Class 1 or 2 on BLM lands or Scenic Integrity Objectives (SIO) Very High and High on USFS lands. These visual resource classifications will further limit opportunities for new recreation infrastructure, especially in the Outback and Remote Zones, which are overwhelmingly classified VRM Class 1 and SIO Very High. While we appreciate these viewshed protections, we are concerned that these visual resource objectives might preclude the installment of basic infrastructure like toilets that might be necessary to protect BENM objects in areas of recreational use. Indeed, with regards to the Front Country and Passage Zones (largely designated as VRM Class II), the Draft EIS states that designating these areas as Class II could “result in limiting recreation infrastructure development, including any new developed campgrounds, restrooms, and other proposed facilities within these management zones, due to the more stringent visual requirements associated with VRM Class II compared to VRM Class III or IV.”<sup>20</sup>

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. The Draft EIS acknowledges that, with regards to SRMAs, ERMAs, and RMZs not being carried forward in Alternative E, “[t]his would mean that no areas would be designated

<sup>19</sup> DEIS page 2-82. Emphasis added.

<sup>20</sup> DEIS page 3-251.



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specifically to have recreation-focused management, potentially limiting the BLM's ability to allocate resources, funding, and attention to address recreation-focused needs or issues when compared to Alternative A."<sup>21</sup> 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.<sup>22</sup> At a minimum, the Final RMP should either carry forward the Indian Creek SRMA or include special management provisions for recreation in Indian Creek.

## C. Permits and Authorizations

The Draft RMP would increase the number of activities requiring a permit throughout BENM. These include special recreation permits (SRPs) for the BLM and special use permits (SUPs) for the USFS. In some cases, we support permit systems, especially where they provide an avenue by which visitors can better understand BENM's cultural values. In other cases, we recommend that BLM reconsider whether new permit systems are necessary to protect BENM objects. 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. Permits should not be instituted primarily as a way to generate revenue for BENM in excess of the costs necessary to implement a permit system, nor should permit systems inequitably focus on a single user group.

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<sup>21</sup> DEIS page 3-432.

<sup>22</sup> See, DEIS pages 2-92 and 2-93 describing management of the San Juan River in Alternative E. While the Alternative does not appear to carry forward the San Juan River SRMA, many of the components of the SRMA are incorporated into general management of the river.



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Of particular note for our community, the draft RMP would establish a new authorization process for climbing routes that require new fixed anchors. The DEIS 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” but does not provide information about what the process will look like, how it will be developed, or how it will be implemented.<sup>23</sup> Outdoor Alliance shares the climbing community’s concern that an extensive and lengthy fixed anchor authorization process could serve as a de facto moratorium on new climbing routes while this process is being formalized. 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.

We also ask that the agencies reconsider their proposal to require permits for “day use in all canyons.”<sup>24</sup> 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

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<sup>23</sup> DEIS page 2-115.

<sup>24</sup> DEIS page 2-102.



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expressed similar concern with the day-use permit requirement for “all canyons,” stating that was not something that the BEC had recommended.

We also recommend that the agencies reconsider Alternative C’s requirement that climbers acquire an Individual Special Recreation Permit (ISRP) for “all climbing activities.”<sup>25</sup> 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.

## D. Future Planning Processes

The Draft RMP previews many important decisions related to recreation management that will be made in future implementation level plans. 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. 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.<sup>26</sup> 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.

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<sup>25</sup> DEIS page 2-84.

<sup>26</sup> DEIS page 2-104.



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- *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.”<sup>27</sup> 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 areas of special designations, such as TCPs, ACECs, or other cultural and/or resource-specific requirements guided by Monument proclamations or other federal laws.”<sup>28</sup>

The Final EIS should clearly describe these implementation level plans and include an anticipated timeline for their development.

## E. Access for Mechanized Users

We support the Draft RMP’s restrictions on cross-country travel by mechanized users, as we believe trail-based recreational development is an effective

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<sup>27</sup> DEIS page 2-84.

<sup>28</sup> DEIS page 2-115.



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conservation tool that avoids and minimizes off trail impacts through planned and managed linear features. However, while Alternative E would largely address access for mechanized users (mountain bikes) through future travel management planning, it unfortunately prohibits future new designations for bicycles. While no concentrated mountain bike trail systems exist in BENM, approximately 152 miles of trails (many of which are motorized off-highway vehicle trails) are used by mountain bikers,<sup>29</sup> and some sections of the existing road system are used for bikepacking.<sup>30</sup> We appreciate that, at least initially, mechanized trail access is maintained, and that in certain situations (such as the Bluff River Trail) the plan acknowledges where mechanized use is allowed on non-motorized trails. However, designated bike trails cover only three miles in the entire BENM. We are concerned by Alternative E's restrictive policies on future bicycle use and limits of existing and future use to OHV areas as compared to Alternative B's more flexible policy.

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."<sup>31</sup>*

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. To accomplish this, the Final RMP might

<sup>29</sup> This number is derived from Outdoor Alliance's GIS database and represents a combination of crowdsourced online data and BLM Ground Transportation Linear Feature data.

<sup>30</sup> See, Bikepacking Roots, *The Bears Ears Loops*, <https://bikepackingroots.org/project/bears-ears-loop-s/> (accessed 5/24/2024).

<sup>31</sup> DEIS page 2-119



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include language designating “limited OHV” trails that allow only Class 1 e-bikes and other compatible non-motorized uses, or otherwise more clearly distinguish between e-bikes and motorized vehicles with regards to OHV trail designations.

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.

## F. Camping

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. Under this Alternative, the agencies and the BEC would conduct future implementation-level planning to evaluate and designate developed and dispersed campsites throughout all of BENM, and in some cases close campsites if they are degrading BENM objects. New developed sites would be limited to the Front Country and Passage Zones, though existing developed sites in the Outback Zone could be maintained. Our community looks forward to providing site-specific input on a camping plan for BENM, particularly with regards to the San Juan River and Indian Creek. In both of these cases, 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.

## G. New Prohibited Uses

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.”<sup>32</sup> While Outdoor Alliance does not outwardly

<sup>32</sup> DEIS page 2-115.



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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.

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Thank you for your work in compiling the Draft RMP, and thank you for considering our input. The outdoor recreation community deeply values the opportunity to visit the BENM landscape, and we overwhelmingly support its continued protection. We are humbled by the opportunity to provide input on this historic Tribal co-management plan, and we look forward to working with Tribal Nations and the agencies to steward this landscape into the future.

Best regards,



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