Dear Mr. Porter:

The National Parks Conservation Association (NPCA) and Coalition to Protect America’s National Parks submits the following comments regarding the Draft Monument Management Plan (DMMP) for the Bears Ears National Monument Indian Creek and Shash Jáa Units and associated Environmental Impact Statement. Like our scoping comments, these comments are in addition to joint comments NPCA has signed with The Wilderness Society (TWS) and others and have been submitted by TWS. We value the entire connected landscape and the cultural, historic and scientific objects, as well as recreation opportunities within the entire monument, however, our greatest concerns and expertise are focused on park adjacent lands and potential impacts to national park resources and values. We submit these comments in addition to TWS et al. to address those park-specific concerns.

National Parks Conservation Association
The mission of the National Parks Conservation Association (NPCA) is to “protect and enhance America’s National Park System for present and future generations.” Founded in 1919, NPCA is the leading citizen voice for the national parks. We are a national non-profit with headquarters in Washington, DC, and 29 regional and field offices across the country, including our Southwest Regional office in Salt Lake City, Utah. NPCA represents over 1.3 million members and supporters who care about America’s shared natural and cultural heritage preserved by the National Park System.

Coalition to Protect America’s National Parks
The Coalition to Protect America’s National Parks (Coalition) is a non-profit organization composed entirely of retired, former, or current employees of the National Park Service (NPS). The Coalition studies, educates, speaks, and acts for the preservation of America’s National Park System. With over 1,600 members, the Coalition represent more than 35,000 years of experience managing and protecting America’s most precious and important natural and historic places.

Bears Ears National Monument Legal Status
The top priority for NPCA and the Coalition is protecting the resources within parks, but we aim to do so within the larger landscape in which they are embedded, and the air and water on which they depend, to enhance their ecological and cultural integrity. Our organizations are strong supporters of Presidential Proclamation 9558 creating the original Bears Ears National Monument on December

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November 15, 2018

Re: Bears Ears Draft National Monument Management Plans and Environmental Impact Statement Comments
28, 2016. President Obama issued this proclamation under the authority explicitly bestowed to him under the Antiquities Act, protecting lands rich in cultural resources and spiritual significance to Native American communities, as well as scenic views and recreation opportunities in the iconic canyon country just steps from Canyonlands National Park, Natural Bridges National Monument and Glen Canyon National Recreation Area.

On December 4, 2017, President Trump signed Proclamation 9681 reducing the boundaries of Bears Ears National Monument by approximately 85% and separating the surviving 15% into two small units, Indian Creek and Shash Jáa. We maintain that Proclamation 9681 is an unlawful revocation of the existing Bears Ears National Monument and will be overturned in a court of law. While the President has authority to create a National Monument under the Antiquities Act, only Congress can revoke or reduce a national monument.

Proclamation 9681 is being vigorously challenged in court and is likely to be overturned. Therefore, the Bureau of Land Management (BLM) and United States Forest Service’s (USFS) rush to develop a Monument Management Plan based on the reduced boundaries of Bears Ears is premature and inappropriate. Moving forward with the planning processes at this time will likely waste time and resources of already strapped agencies.

NPCA’s and the Coalition’s submission of comments on the DMMP in no way constitutes acceptance of Proclamation 9681 or management changes that may result from this process. By participating in this process, we are not waiving any rights to contest the underlying proclamation or processes flowing from it.

The agencies should abstain from planning efforts under the new proclamation for Bears Ears National Monument until the legitimacy of the proclamations are fully settled in federal court. Instead, we recommend the BLM and USFS spend time and resources ensuring the protection of the natural and cultural resources within the original monument, safeguarding it for current and future American generations.

**NPCA’s and the Coalition’s Commitment to the Bears Ears Landscape**

NPCA has a long-standing commitment to protect a significant portion of the original Bears Ears area of northern San Juan County, adjacent to Canyonlands National Park. Since 1988, we have advocated expanded protections of the natural and cultural resources around the park through our Canyonlands Completion campaign. Our vision includes extending protections from the existing national park boundary to the natural erosional boundary of the Wingate cliffs. Such a boundary would better incorporate the whole basin, as well as adjacent cultural and natural resources, while removing some of the external threats to park resources.

Protection for national parks can only be assured when their adjacent lands are carefully managed. The Bears Ears National Monument as established under Proclamation 9558 provided security for the management of Southeastern Utah’s public lands, including its national parks. The original national monument boundaries established under Proclamation 9558 secured protection for Canyonlands and other national park units both inside and adjacent to the monument, including Natural Bridges National Monument and Glen Canyon National Recreation Area.

Any actions proposed within the original and valid boundaries of the Bears Ears National Monuments should only substantially advance the proper care and management of the objects of interest as set forth in Proclamation 9558. In our scoping comments, we requested that the BLM and USFS put forth alternatives in the Bears Ears National Monument Management Plan that protect the important and sensitive resources of the original monument including cultural, natural/ecological, paleontological, geological resources as well as Tribal sacred lands. As more and more people learn about and visit the landscape within the original monument boundaries while interest in resource
extraction persists, the risk of resource degradation and destruction is a valid concern if a comprehensive management plan is not developed.

Preserving our legal challenge to Proclamation 9681 and our overarching and continuing objection to the truncated monument boundaries reflected in the current Bears Ears National Monument Draft Management Plan, our comments below address the potential impacts to Canyonlands National Park and Natural Bridges National Monument stemming from the Shash Jáa and Indian Creek Units as described in the plan. The Needles District of Canyonlands National Park is particularly vulnerable to impairment from incompatible management decisions, since it is adjacent to the Indian Creek Unit of Bears Ears National Monument.

**National Park and Monument Resources of Concern**

It has long been recognized that activities outside the boundaries of National Parks can and often do have dramatic adverse effects on the Parks. Air, water, sound, light, viewsheds, plant communities and wildlife do not stop at park borders. Accordingly, the National Park Service’s Management Policies provide that, in order to carry out the Congressionally defined mission to conserve and protect the Parks, NPS “will seek the cooperation of others in minimizing the impacts of influences originating outside parks,” including “by controlling noise and artificial lighting, maintaining water quality and quantity, eliminating toxic substances, preserving scenic views, improving air quality . . ., and using other means of preserving and protecting natural resources.” NPS Management Policies 2006 (§ 4.1.4).

**The DMMP Range of Alternatives**

Many of the management actions addressed and proposed in the Bears Ears DMMP have the potential to impair the above-mentioned park resources and values. In particular, the agencies’ preferred Alternative D does not provide adequate protections of the monument objects of scientific and historic interest identified in both Proclamation 9558 and 9681 nor for the adjacent national park resources of concern. Alternative D is essentially a continuation of multiple-use management with few restrictions that leave the monument’s objects and adjacent national park resources subject to direct and indirect impacts. Relative to the other alternatives, in most cases, Alternative D is the least protective of national park resources. Under this Alternative, important values of Canyonlands National Park and Natural Bridges National Monument to a lesser extent, will be undermined by activities such as OHV use, UAV (drone) use, and potential new developments. These activities would jeopardize the natural resources that Congress has legislated to protect within the park including its soundscape, viewshed, wildlife, and water quality. In addition, the granting of rights-of-way and development of the lands within both the Shash Jáa and Indian Creek units of the Monument area, would potentially mar the treasured scenery within and along the entrance roads to the Needles District of Canyonlands National Park and Natural Bridges National Monument.

In contrast, Alternative B, which “[p]rioritizes protection of Monument objects” (DMMP 2-1), is generally more protective than Preferred Alternative D. Yet, even Alternative B does not go far enough to secure Monument objects and adjacent National Park resources and visitor experience.

Below we detail specific management issue concerns with the range of alternatives and consequent impacts to national park resources in the order in which they are addressed within the DMMP.

**I. Lands and Realty**

**Rights of Way (ROWs)**

New Rights of Way (ROWs) are inappropriate management activities within a protected landscape. New Rights of Way described as including pipelines, powerlines, roads, and infrastructure for utilities (DMMP 3-19, 3-20) can have direct impacts not only on Monument visitors and resources, but on adjacent national park resources, which the agencies fail to consider.
Alternatives A-D provide for vastly different approaches to ROWs within the Indian Creek unit, with the Preferred Alternative D being the least restrictive and Alternative B excluding ROWs from the planning area (DMMP 2.4.3.3). Preferred Alternative D would manage the vast majority of the Monument as “Open” to ROWs, including the area bordering Canyonlands National Park (DMMP Map 2-8). Only Bridger Jack Mesa WSA would be excluded from ROWs. Shay Canyon ACEC, Lavender Mesa ACEC, and active flood plains and recreation areas would be “avoidance areas” subject to the same criteria as Alternative C. In addition, ROW’s would be available for maintenance or improvement of existing roads.

Alternative B, by contrast, would manage the entire Planning Area as a ROW exclusion area, with the exception of private land access and infrastructure (DMMP Map 2-4). This would maintain the existing recreation setting (DMMP 3-46) and provide the strongest protections for national monument and adjacent national park resources and visitor experience. NPCA and the Coalition support the ROW management decisions in Alternative B. ROWs should not be made available for maintenance or improvement of existing roads.

Unmanned Aerial Vehicles (“UAV” or Drone)
All of the Southeast Utah Group National Parks (Canyonlands and Arches national parks and Hovenweep and Natural Bridges national monuments) prohibit the “Launching, landing, or operating unmanned aircraft within” their boundaries. See Superintendent’s Compendium or Designations, Closures, Permit Requirements and Other Restrictions Imposed Under Discretionary Authority - 36 CFR 1.7(b), November, 2017; https://www.nps.gov/cany/learn/management/compendium.htm. This is because the use of UAV’s in parks “brings noise and visual intrusions where visitors expect quiet and natural vistas. Their use creates a safety concern for visitors, disturbs wildlife, and otherwise conflicts with the mission of national parks to preserve and protect natural and cultural resources and their associated values.” https://www.nps.gov/cany/learn/news/news082014.htm

Because the impacts described above for national park visitors can also impact national monument visitors, NPCA and the Coalition urge the agencies to follow the lead of the NPS in prohibiting the use of UAV’s within Bears Ears National Monument, a designated protected area. The use of drones particularly near the boundary of Canyonlands National Park may lead to intrusions into the park and would create an incompatible use difficult to monitor and enforce within a backcountry environment. The preferred alternative does not go far enough and leaves portions of the planning area, particularly adjacent to Canyonlands, open to drone use. We support Alternative B, which prohibits the casual use landing and takeoff of UAVs anywhere in the Planning Area. Use of UAVSs for administrative use or permitted use would be analyzed on a case-by-case basis per U.S. Department of the Interior Operational Procedures Memorandum (OPM)-11, USFS Manual 5713.7, USFS Handbook 5709.16, and Federal Aviation Administration Civil Operations Part 107. (2-9)

II. Lands with Wilderness Characteristics

NPCA and the Coalition urge the agencies to continue managing the Lands with Wilderness Characteristics (LWC) within the Bears Ears National Monument. With so few places left in the United States that truly qualify as wilderness, it is important to preserve those places that do. In addition, nearly all of the Canyonlands National Park landscape adjacent to the Indian Creek unit of the Bears Ears National Monument is NPS recommended Wilderness and is managed as such (attach NPS Canyonlands Wilderness map). Consistent management across the boundary would ensure that the wilderness characteristics of both the national monument and national park remain eligible for Congressional designation and continue to provide solitude and opportunities for primitive recreation.

According to the Analysis of the Management Situation (AMS) of the Indian Creek Unit, over half of the land in the Indian Creek Unit (39,494 acres out of 71,896 acres total) currently consists of LWC
determined by the BLM (AMS Map 8). However, none of the DMMP alternatives includes managing all of the identified LWC for their wilderness character. On the least protective end, Preferred Alternative D does not manage for protected wilderness characteristics on any of the existing LWC. Instead the agency would “Manage lands with wilderness characteristics for multiple uses, subject to management actions for other resources and resource uses within this plan” (DMMP Table 2-4). Rather than maintain the area’s wilderness qualities, the preferred alternative would provide for a variety of incompatible and potentially destructive activities including more motorized recreation within the LWC and likely result in the loss of the lands’ wilderness character.

NPCA and the Coalition recommend that the agencies manage all of the LWC landscape adjacent to Canyonlands National Park to maintain consistency for both the Monument wilderness character and NPS managed wilderness. We support Alternative B modified to include LWC lands near the southeast boundary of Canyonlands between Lavender Canyon and Bridger Jack Mesa, which was excluded (DMMP Map 2-10 and AMS Map 8). This includes closing the LWC to OHV use, commercial wood cutting, construction of new roads along with a ROW exclusion, classification as VRM I for minimal impacts to viewsheds, and only non-mechanical vegetation treatments.

III. Water Resources

In the American West, water is a precious resource. Protecting key watersheds and water sources should, therefore, be a clear priority for public land managers. At Canyonlands National Park, protecting the confluence of the Green and Colorado Rivers contributes to the park’s significance and is a stated priority for NPS management:

“Canyonlands National Park protects the confluence, significant reaches, and associated ecosystems of two major western rivers, the Green and Colorado, which have shaped the complex natural and human histories of the park and surrounding region.” (CANY Foundation Document p.9)

In addition, the two rivers are considered a fundamental resource that are essential to achieving the purpose of the park and maintaining its significance:

The Green and Colorado rivers are the lifeblood of the park, and fundamental to their integrity are clean water, native biotic communities, characteristic landforms, and the natural hydrologic, geomorphic, and biotic processes necessary for sustaining them. (CANY Foundation Document p.12)

While the NPS places a high priority on managing the fundamental water resources inside park boundaries, they are obviously part of a much larger system. All watersheds in the Bears Ears NM planning area eventually flow into the Colorado River (DMMP 3-13) inside either Canyonlands National Park or Glen Canyon National Recreation Area (NRA). Indian Creek, which flows through the Indian Creek unit of Bears Ears National Monument, and its tributaries flow into the Colorado River just inside Canyonlands National Park. The Shash Jáa unit drains portions of Comb Wash, Butler Wash, and their tributaries into the San Juan River, which then flows into the Colorado River within Glen Canyon NRA. Therefore, water resource management within Bears Ears NM, will affect downstream NPS water resources as well as those on the larger shared landscape.

Water withdrawals, grazing, irresponsible OHV use, ROW’s, vegetation treatments, timber management, and wildfire management can have significant impacts on water quality and quantity as well as soils, riparian vegetation, and fish and other wildlife downstream. The agencies acknowledge that water quality is already compromised within the planning area when they state, “Water quality concerns within the Planning Area include high stream temperatures, low dissolved oxygen, high sediment loads and nutrient concentrations, high salinity, and high coliform bacteria.
concentrations. Many of these concerns are associated with riparian health and cover, water quantity, and natural conditions” (DMMP 3.12.1). It is therefore important that the agencies make management decisions that will restore, not further compromise already degraded water resources.

We support providing the strongest protections possible for water resources within the Monument. Alternative B would protect sensitive riparian areas from ROW development, some OHV use and grazing. It would close redundant routes and trails while prohibiting off-trail hiking in sensitive water resource areas and provide clearly marked trails in areas where multiple social trails have been developed. With regard to water withdrawals, Alternative B would require a hydrologic study for all proposed groundwater withdrawals and new wells while not authorizing land uses for water withdrawals that could negatively affect groundwater for seeps and springs (DMMP Table 2-10).

Alternative B also precludes surface-disturbing activities on both BLM and USFS lands within the following: public water reserves, active floodplains, 100-year floodplain of the San Juan River, and 500 feet of intermittent and perennial streams, rivers, riparian areas, wetlands, and springs. However, this Alternative allows for an exception of vegetation treatments and recreational infrastructure. We urge the agencies to eliminate the exception for mechanical vegetation treatments and to only allow for recreational infrastructure that would enhance and further protect water resources from recreational use.

In addition to the above-mentioned management provisions we support from Alternative B, we recommend including the following monitoring requirements from Alternative C: Water resources and soils would be monitored for degradation from use of roads, equestrian routes, mechanized routes, hiking trails, and/or natural variability in seasonal cycles. This monitoring would include loss of bank stability, incised channels, headcutting or downcutting, and sedimentation due to loss of vegetation cover (DMMP Table 2-11). We also recommend provisions from Alternative C for adaptive management during implementation-level travel planning, where specific source(s) for degradation would be identified and adaptive management would be implemented to address this degradation. Management actions could include temporary route closures for natural reclamation, active reclamation, and revegetation of eroded sites.

IV. Social and Economic Considerations

The analysis fails to consider the direct relationship between increasing visitation to nearby national parks and how that trend may positively impact future national monument visitation. Nor does BLM consider the social and economic benefits of not only conserving national monument natural and cultural resources, but also minimizing adverse impacts to nearby national park resources and values.

As background, national park and monument visitors are flocking to Utah in record numbers. According to the National Park Service, 14.4 million people visited Utah’s national parks in 2016. That number increased to 15.2 million people visiting in 2017. Those visitors are coming to experience not only Utah’s Mighty Five national parks, but the mosaic of spectacular public lands across our state, including Canyonlands National Park, and Natural Bridges and Bears Ears National Monuments. According to the Outdoor Industry Foundation, in 2016, that visitation contributed $12.3 billion to Utah’s economy. As a result, it is imperative we recognize the importance of preserving the natural and cultural resources that are protected by our national parks and monuments, along with the celebrated dark night skies, intense quiet and the spectacular vistas that continue to draw more and more visitors.
V. Travel and Transportation Management

NPCA and the Coalition have significant concerns about the pressure on the agencies to expand OHV use within the Bears Ears National Monument through this process and the resulting Preferred Alternative D for Travel and Transportation Management. For years, our organizations have advocated for NPS management action to prevent illegal OHV use and reduce environmental impacts through appropriate planning, visitor education, outreach, and enforcement. We have also consistently raised concerns with OHV use outside park boundaries that cross illegally into national parks, which can negatively impact wildlife, crush fragile desert soils and plant life, increase wind and water erosion, and degrade the natural quiet for visitors.

An appropriate acoustical environment is an important element in how visitors experience the cultural and historic resources in the national parks. Wildlife and park visitors who visit remote areas to experience quiet are likely to be especially sensitive to noise. In addition, soundscapes are part of the “human environment” subject to the requirements of NEPA. 42 U.S.C. § 4331 (C); see also Wyoming v. United States DOI, 674 F.3d 1220, 1236 (10th Cir. 2012) (upholding NEPA analysis in part because NPS properly considered “soundscapes”). The NPS Natural Sounds Program Mission is “…to protect, maintain, or restore acoustical environments throughout the National Park System.” NPS strives to “preserve, to the greatest extent possible, the natural soundscapes of parks.” NPS, Soundscape Management Policy 4.9 (2006). “In and adjacent to parks, the Service monitor[s] human activities that generate noise that adversely affects park soundscapes, including noise caused by mechanical or electronic devices.” Id.

The original monument Proclamation 9558 mentions the “rare and arresting quality of deafening silence” (p. 4) of the Bears Ears landscape. However, as the agencies note, “There are no specific soundscape management actions proposed under any alternative; however, numerous management actions that support natural, undeveloped, non-motorized settings also provide beneficial impacts to soundscapes consistent with the BENM’s identified value of natural quiet, as specified in the Proclamation” (DMMP 3-40).

OHV use can also significantly impact the natural sounds and overall visitor experience of those seeking a more remote, backcountry visitor experience. The agencies have noted, “OHV recreation would be the primary source of noise in the Planning Area. . . . Alternatives allowing OHV use in larger areas would have greater impacts on soundscapes (DMMP 3.11.2.2.1, Tables REC-2 and REC-4). With thousands of miles of already designated OHV routes, the need for increased OHV access within and adjacent to protected landscapes has not been demonstrated, particularly when balanced against the risks of resource damage to these fragile landscapes and the visitor experience.

Preferred Alternative D would allow for expanded use of OHVs while only minimally closing areas to their use completely. This Alternative leaves broad swaths of the planning area open to road and ATV trail development. Within the Indian Creek unit, the Preferred Alternative would allow OHV use in 64,636 acres and close only 6,902 acres. The only areas that would be closed to OHV use in Indian Creek under Alternative D are Lavender Mesa—an Area of Critical Environmental Concern (“ACEC”), and Bridger Jack Mesa—a Wilderness Study Area (“WSA”) (See Map 2-27. and Table REC-4). Preferred Alternative D would essentially leave the entire shared boundary with Canyonlands National Park open to potential OHV trails and use. This is completely incompatible with the park’s regulations, which only allows for conventional motor vehicle use on designated park roads.

The impairment resulting from leaving extensive sections of the Monument open to OHV use would be compounded by the curtailed oversight proposed under Preferred Alternative D. Under this alternative, Special Recreation Permits (“SRP’s”) would be required only when a group size exceeds 25 OHV/mechanized vehicles, 50 individuals, or 15 pack animals. See MMP at 2-13. This policy would open the door to large groups accessing much of the monument with no stewardship by the
Alternative B would provide more oversight of large groups while protecting more of the adjacent landscape. This alternative would permit 27,975 acres of limited OHV use and close 43,918 acres to OHV use, including more of the landscape and existing routes directly adjacent to Canyonlands National Park. This would better respect the adjacent park’s acoustical environment and more likely prevent illegal incursions into the park. Alternative B would also have a lower, more appropriate threshold for requiring SRP’s. An SRP or a letter of agreement would be required if an organized event or activity group size exceeds 12 OHV or mechanized vehicles, 24 individuals, or 12 pack animals (DMMP 2-13).

Nevertheless, Alternative B would also leave a substantial portion of the adjacent southern border of Canyonlands NP open to OHV use (DMMP Map 2-29, Table RE-4). Therefore, NPCA and the Coalition recommend developing a new alternative, similar to Alternative B, that would close the entire shared boundary with Canyonlands National Park from existing and future OHV use with the exception of open routes that continue into the national park. This would ensure consistent and compatible management across boundaries and help prevent incursions into the park along with impacts to park resources and visitor experience. The agencies should also carefully oversee the use of OHV’s and should subject proposed group access to review to ensure that soundscapes within the Monument and on adjacent lands in Canyonlands are protected.

Finally, we encourage the agencies to complete sound modelling to assess noise impacts, including from OHV use, to monument and national park visitors as well as wildlife. Having better data on soundscapes from OHV use can help determine appropriate use levels and locations while preserving this important aspect of the monument as defined in the Proclamation as well as the adjacent national park landscape.

VI. Visual Resource Management and Night Skies

Visual Resource Management
The Colorado Plateau is a vast, wide, open landscape that affords incredible views, in some cases 360-degree views of undeveloped land for 100 miles. Public land management boundaries are indistinguishable to most visitors. Part of the unique experience of visiting this remote area of Southeastern Utah is the opportunity to seemingly travel back through time to learn about ancient history and modern settlers to the area, as well as the expansive views and vistas throughout. Incompatible development within view of the national park units and the monument could significantly impact that experience.

Alternative B provides the strongest protection of both monument and national park visual resources by managing the most acreage of the Monument as VRM Class I, which would preserve or retain the values of the Monument’s relatively pristine visual resources (DMMP 3-89) while benefiting recreational users who visit the Monument and surrounding landscape to enjoy the unmarred, expansive viewsheds. With regard to visual impacts to Natural Bridges National Monument and Canyonlands National Park, NPCA and the Coalition recommend that at a minimum, the viewsheds and entrance roads from both NPS units, including the SR-275 corridor, be designated VRM Class I with no exceptions.

Night Skies
The Colorado Plateau is one of the last sanctuaries of darkness amidst a rising surge of light pollution. Many visitors go to national parks and monuments to experience the dark, starry skies, which brings economic benefit to the parks and monuments and surrounding communities. In
addition to the visitor experience, wildlife species depend on natural patterns of light and dark for navigation, to cue behaviors, or hide from predators.

NPS has recognized dark night skies as an important resource that plays a critical role in natural resource processes and the evolution of species, as well as contributing to the national park visitor experience (NPS Management Policies 2006, § 4.10). Canyonlands National Park and Natural Bridges National Monument are both designated International Dark Sky Parks, a designation reserved for parks with “exceptional” and well-preserved night sky resources. People visit these places just to experience their dark night skies, to learn about them through ranger-led interpretive talks and view them through high powered telescopes.

We appreciate that the agencies recognize the important night sky resource found within the Bears Ears National Monument and larger region and has included Best Management Practices (BMPs) for minimizing impacts to night skies (DMMP 2-25). Rather than including these provisions as unenforceable BMPs, however, we recommend they be incorporated as a requirement or stipulation to any development or activity requiring consistent lighting. In addition to the BMPs listed in the plan, we also recommend adding the following requirements:

- limit the number of lights and lumen output of each (minimum number of lights and the lowest luminosity consistent with safe and secure operation of the facility)
- utilize alternatives to lighting where feasible (retro-reflective or luminescent markers in lieu of permanent lighting)
- consider fixture design (lights of the proper design, shielded to eliminate uplight, placed and directed to eliminate light spill and trespass to offsite locations)
- identify any activities that may be restricted to avoid night-sky impacts
- Identify a process for promptly addressing and mitigating complaints about potential lighting impacts

VII. Wildlife

It is widely understood that fragmentation of wildlife habitat and corridors poses a threat to healthy wildlife communities, overall ecosystem functions and resiliency in a changing climate. Canyonlands National Park is home to rare desert bighorn sheep, Mexican spotted owls, peregrine falcons, and other raptors. Along with being important components of the park’s ecosystem, these animals are also observed and enjoyed by park visitors. Therefore, they have been recognized by the NPS as a resource and value that are important to consider in management and planning decisions within the park (https://www.nps.gov/cany/learn/management/foundation-document.htm ). In addition, Canyonlands National Park is home to three threatened or endangered bird species, four endangered fish species, and numerous species of special concern (https://www.nps.gov/nabr/planyourvisit/upload/threatened.pdf ). It is important to ensure that their habitat is not fragmented on either side of the management boundary or negatively impacted from upstream activities.

NPCA and the Coalition recommend the agencies provide the strongest protections possible for the wildlife inside and adjacent to the monument. Fortunately, to date, negative impacts on wildlife have been minimal in the Indian Creek Unit because it has remained mostly natural with minimal development. Any increase in development or human activities through the DMMP could result in increased harm and disturbance to wildlife. The Preferred Alternative D, as well as Alternatives A and C include management prescriptions that would jeopardize wildlife directly (through noise or physical contact) or indirectly (by damaging their habitat).

Examples of impacts to wildlife in the DMMP include OHV use and ROW development, both of which can lead to excessive noise and fragmentation or destruction of important habitat. Increases in
noise levels (relative to ambient noise levels) are generally considered a detriment to wildlife. The agencies point out that “noise increases can lead to panic responses in wild populations of ungulates (Weisenberger et al. 1996), which requires energy from the animals and can put them at health risk, especially during years of drought, where resources may be more limited and energy conservation would be considered much more valuable” (DMPP 3–97). Development and OHV’s can also be vectors to the introduction and proliferation of invasive and noxious plant species. More directly, roads and OHV use can result in direct injury and/or mortality of big game species through collision.

**Monitoring and adaptive management**

In order to ensure that the best possible policies are in place, we strongly recommend the agencies incorporate a provision for close monitoring of resource impacts and degradation as well as the ability to incorporate adaptive management to be able to address unanticipated impacts or environmental degradation stemming from allowed activities.

**Coordination with Stakeholders**

Because national parks and monuments share both boundaries and resources and are, to some extent, interdependent, it is important for land managers to engage with other agencies, decision-makers and stakeholders. We urge the agencies to maintain ongoing communication and strong coordination with NPS managers. Their expertise and cross-boundary management challenges can and should help shape the management of Bears Ears National Monument. In addition, we urge the BLM to complete a Cultural Resource Inventory as soon as possible and collaborate with Native American tribes to better inform monument management decisions within the original monument boundaries, not just within the Shash Jáa unit as described in Proclamation 9681. In addition, we urge the BLM to incorporate traditional cultural knowledge and tribal representatives in the interpretation of monument history, cultural sites and traditional uses.

**Conclusion**

We appreciate your consideration of our comments and those of our members and supporters. We look forward to working with you to ensure that our national parks and monuments, together with their connected cultural landscapes and surrounding public lands, remain the protected, extraordinary places that draw visitors from across the country and the world.

Sincerely,

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