

June 8, 2018

Matthew Betenson, Associate Monument Manager  
Grand Staircase-Escalante National Monument  
Bureau of Land Management  
Department of Interior  
669 S. Hwy 89A  
Kanab, UT 84741

Submitted Electronically at: [blm\\_ut\\_ccd\\_monuments@blm.gov](mailto:blm_ut_ccd_monuments@blm.gov)

**Re: Economic Comments for the Resource Management Plans for the Grand Staircase-Escalante National Monument—Grand Staircase, Kaiparowits, Escalante Canyon Units and Federal Lands Previously Included in the Monument that are excluded from the Boundaries**

Mr. Betenson,

*We believe that the Presidential Proclamation issued by Trump was unlawful, as the President does not have the authority under the Antiquities Act to revoke or shrink the boundaries of a national monument designation. Due to ongoing legal challenges, we strongly recommend the agency halt planning for the Grand Staircase, Kaiparowits, and Escalante Canyon units until the legality of the action is resolved. Absent BLM's agreement to cease all preparation of a monument management plan, we hereby submit the following economic comments.<sup>1</sup>*

The Conservation Lands Foundation, Grand Staircase Escalante Partners, The Wilderness Society and Grand Canyon Trust are invested in protecting the spectacular resources located in Grand Staircase-Escalante region. In addition to the important historical, scientific, and cultural resources offered in the original Monument's 2 million acres, this landscape is a significant economic driver for the local communities, counties and State of Utah. BLM should consider the overwhelming amount of data that demonstrates protecting this region for conservation, science and recreation will continue to drive a healthy and growing local and regional economy.

We have attached this data for the record as it should drive the planning for this entire RMP, including the "Federal Lands Previously Included in the Monument that are excluded from the Boundaries." Much of the economic data accompanying this letter is based on U.S. Department of

---

<sup>1</sup> By submitting these comments CLF, Grand Staircase Escalante Partners, The Wilderness Society and the Grand Canyon Trust in no way expressly or impliedly waives, concedes or releases any and all claims of any nature whatsoever, whether legal, equitable or otherwise, which our groups may have in challenging President Trump's unlawful revocation and modification of the Grand Staircase-Escalante National Monument through Presidential Proclamation 9682. Our participation in the planning process and submission of these comments does not legitimize this process in any way.

Commerce's, Bureau of Economic Accounts. We urge you to give this data significant weight especially when compared to hypothetical earnings from future extractive projects. We have summarized some of the data below and have attached the full reports.

### **1. Local Business**

The surrounding communities of the Grand Staircase-Escalante have benefited significantly from the large landscape protection provided by the National Monument. Since Grand Staircase-Escalante's designation as a National Monument in 1996, the Escalante-Boulder Chamber of Commerce has voiced considerable and unanimous support for the Monument. At least eight business owners in the area have traveled to Washington D.C. to convey the economic importance of this Monument to the growth of their communities, and more than 40 businesses have written letters to the Secretary of the Interior expressing their businesses' dependence on the economic draw of Grand Staircase. Additionally, involvement in the Grand Staircase-Escalante Partners organization has increased substantially over the last 15 years, seeing a 438% growth in the last year alone.

### **2. Statewide Tourism Increase**

Utah is home to 22.8 million acres of public land managed by the Bureau of Land Management, and the presence of Grand Staircase-Escalante has garnered more visitors to enjoy all the public lands of Utah and feed into its economy as whole. The lure of Escalante to recreationists has been documented as far back as the 1930's when artists such as Everett Ruess helped infuse the landscape in the American psyche. Recreationists have been exploring the Grand Staircase-Escalante region ever since.

In 2016, Grand Staircase-Escalante saw a record setting 923,236 visitors. Major parks such as Zion National Park and Bryce Canyon have doubled their visitation figures—amassing over 4 million and 2 million, respectively—since 1996, the year Grand Staircase-Escalante was born. Development within the heart of the monument would greatly impact the tourism draw to this specific area of the West, ultimately affecting the economic growth of these gateway communities.

### **3. Job and Population Growth**

Since its designation, approximately 2,000 tourism-related jobs have been added in the region of Kane and Garfield Counties, totaling 45 percent of the total job market in the area. The region has also seen exponential growth in service jobs since 1998, where such jobs increased by nearly 20 percent, comprising 95 percent of the overall job market in the region of Kane and Garfield Counties. Examples of service jobs are trade, transportation, financial activities, professional and business employment, education, and health. The growth in the region's job market directly

correlates to its population growth as well, which increased exponentially post-designation of Grand Staircase-Escalante. From 2010 to 2016, the population of the region increased 3.2 percent, while the 20-year increase since its inception totals a combined 30 percent.

In closing, on behalf of CLF, Grand Staircase-Escalante Partners, The Wilderness Society and Grand Canyon Trust we respectfully urge you to consider the compelling economic impact these large landscapes have on regional and statewide communities.

Thank you for full consideration of our economic comments.

Sincerely,

Danielle Murray  
Senior Legal and Policy Director  
Conservation Lands Foundation  
970-247-0807 x102  
[danielle@conservationlands.org](mailto:danielle@conservationlands.org)

Nicole Croft  
Executive Director  
Grand Staircase Escalante Partners  
435-201-0693  
[nicole@gsenm.org](mailto:nicole@gsenm.org)

Phil Hanceford  
Conservation Director  
The Wilderness Society  
303-225-4636  
[Phil\\_hanceford@tw.s.org](mailto:Phil_hanceford@tw.s.org)

Mary O'Brien  
Utah Forests Program Director  
Grand Canyon Trust  
435.259-6205  
[mobrien@grandcanyontrust.org](mailto:mobrien@grandcanyontrust.org)