

Below are some sample comments that you may want to consider

- Grand Staircase-Escalante National Monument was designated to protect amazing fossils sites for research. The unparalleled fossil discoveries and opportunities for more to come are unparalleled. Its cultural history inspires us and its amazing geological wonders were protected to ensure recreation opportunities for people who come from near and far. Now these lands are more at risk than ever.
- Fossils at risk: The proposed plans leave lands, including those within the monument, open for “casual collection” of fossils. This is damaging and reckless. The BLM acknowledges these risks -- “loss of significant specimens” – in their own analysis, yet they recommend a plan that allows random collection and no protection for historic fossil sites. This goes against the very reason that Grand Staircase was created.
- BLM claims they will no longer put public lands up for sale, but they can’t be trusted. The actual language in the agency memo only directs BLM to remove the disposal language from the preferred alternative, leaving the BLM free to engage in last minute shenanigans and put it back in the plans.
- The BLM used every opportunity they had to open the lands excluded from Grand Staircase to energy development:
 - The only lands closed to oil and gas leasing are those that the BLM was legally prohibited from opening because they are wilderness study areas.
 - .02% are recommended for withdrawal from mining, leaving nearly all of the land open to potential hard rock or other mining.
 - 75,000 acres - just 9% - are found unsuitable for coal mining; suggesting that 91% of these monument-quality lands are somehow appropriate for coal mining.
 - The highest quality fossil areas would now be opened for leasing rather than be given the high levels of protection as monuments and even responsible land use plans can and should do.
- The BLM’s proposed plan does not close any lands to motorized use.
- Acres and acres of lands are excluded from protection and none will be managed to protect their conservation, recreation, research, biological or wilderness values.
- The BLM’s preferred alternative (D) will re-open the Escalante River north of Glen Canyon Recreation Area to grazing. The BLM retired these allotments decades ago because the health of the Escalante river and the riparian zone it supports is incompatible with grazing. Over 90% of the Monument is currently open to grazing. This area should not be.
- Both the Grand Staircase-Escalante National Monument and the excluded lands are managed with the least possible protections: “Compared to other alternatives, Alternative D [the BLM’s preferred plan] conserves the least land area for physical, biological, and cultural resources; designates no special conservation management areas (Areas of Critical Environmental Concern or Special Recreation Management Areas); and gives the most discretion to energy and mineral development.”

Recommendations for crafting your comments:

1) Work in a word processing document; don't try to comment directly into the e-planning page. That way, you can work over several days or weeks, and then copy-paste your comments at one time. You have until November 30th to comment.

2) Please consider sending your comments in ALL three ways - via e-planning; via the email to the Grand Staircase-Escalante National Monument headquarters office in Kanab; and via US Postal Service in hard copy form to the Grand Staircase-Escalante National Monument headquarters office in Kanab.

3) A "heartfelt letter" is good for your soul. The reality is that only SPECIFIC comments will be evaluated.

4) Here are the specific links to the management plan proposals:

Vol. 1: the important thing here is to look at the **charts** in Chapter 2.

[GRAND STAIRCASE-ESCALANTE NATIONAL MONUMENT-KEPA RMPs-EIS_Vol_1-508.pdf](#)

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Vol. 2: important here are the **maps**

[GRAND STAIRCASE-ESCALANTE NATIONAL MONUMENT-KEPA RMPs-EIS_Vol_2-508.pdf](#)

These documents are available on the BLM e-planning site:
[planAndProjectSite.do](#)

You will find them under "Draft RMPs & EIS." If you have access to GIS data, look at the left side of the e-planning site and you will find much more detailed info.

5) For those seeking information specifically on the proposal to open the Escalante River to grazing, you can look at the **contradiction/error** between Vol. 1 page 2-21 chart showing the preferred Alternative D noting: "...and maintain closures or cancel grazing permits, including the following areas: (a list follows, and the first one is Escalante River); Now, compare that to Vol. 2, Map 48, that shows the yellow areas as "available to livestock grazing."

6) Look at the sections that interest you. The best is if you can compare the maps with the charts - side by side. Print them out if you can. Look at grazing, commercial timber harvest, mineral extraction, off highway vehicle use, recreation, realty actions, dark skies, etc. Know that all BLM national monuments are to be protected, conserved, and restored as their **primary agency mission**, regardless of which proclamation they fall under.

7) A lot of folks have worked hard on "Dark Skies" in our region. Grand Staircase-Escalante National Monument is the darkest, largest place in the continental U.S. The original boundaries of Grand Staircase-Escalante National Monument qualify for Dark Sky Sanctuary - the highest recognition of darkness - because of the size and completeness of no development. Look at Vol. 1 chart on 2-17 & 2-18. There you see that only Alt. B is the place it recommends that the entire area be designated a Dark Sky Sanctuary. You can recommend that this should occur if you wish.

8) You need to reference the document, and make comments about particular places - what you want or don't want to see happen; where the location is on the ground; and how an activity or action should or should not occur. Neither the contractor nor BLM staff will "read between the lines."

9) The *final alternative*, signed by BLM, will likely be a combination of things from all of the alternatives. You can note your preference for other alternative recommendations and why.

10) These are **your** public lands. Don't be intimidated by these documents.