

5/15/17 - Comments submitted to Regulations.gov on "Review of Certain National Monuments Established since 1996", specific to Bears Ears:

I write as Executive Director of Great Old Broads for Wilderness, on behalf of 8,000 members and advocates, including 3 local chapters in Utah and chapters in multiples states with monuments under review. The comments reflect our unwavering support for the Bears Ears National Monument as designated (we will submit separate comments on other monuments.)

i. The monument as designated does not exceed "the smallest area compatible with the proper care and management of the objects to be protected". In fact, the area needed to protect the objects of antiquities would be at least 1.9 million acres as shown in the original monument proposal by the Bears Ears Inter-Tribal Coalition. Many compromises were made to reach the size at its designation of 1.35 million acres, and any further reduction will compromise the care and management of the cultural heritage of our nation and of the five native tribes that proposed the monument. Our members commented extensively in previous public comment opportunities in favor of the larger monument proposal.

ii. These lands as designated contain innumerable historic and prehistoric structures, as well as objects of cultural and scientific interest. The area abounds with archaeological sites of remarkable quality, with over 100,000 identified. From Clovis to Basketmaker and Pueblo sites, as well as historic Native American and Mormon pioneer sites, Bears Ears boasts one of the richest and densest cultural treasures. Pictographs and petroglyphs tell the history of the area. The Monument was requested by five tribal governments whose very heritage it protects. Scientific objects include fossils of newly-described species, and we have seen tracks of early reptiles as well as fossilized plants and animals. Our members, both from Utah and elsewhere, spend significant time at Bears Ears to appreciate America's cultural history and scientific wonder.

iii. The monument continues to be multiple-use, with designated roads and trails for motorized and mechanized vehicles (e.g. bicycles); existing utility, pipeline or telecommunications facilities allowed; and tribal collection of medicines, berries, and firewood permitted. Few oil and gas resources exist within the monument boundaries, which were adjusted to exclude these resources, and existing mineral rights will be respected. Much misinformation has spread about what will be prohibited in the monument, but the proclamation makes it clear that multiple uses will continue. The monument does not lock anyone out, and all of these lands were federal lands prior to designation. Our members have continued to enjoy the monument on foot, bicycle, and in motorized vehicles.

iv. Non-federal lands (SITLA) within the monument may be traded for lands of equal value outside the monument, allowing for even greater access and enjoyment of the lands. (It is unclear to the casual visitor whether SITLA lands within the monument are open or if trespassing charges could ensue.)

v. Of 7 Navajo chapter houses in Utah, only 1 (Aneth) opposed the monument. Even within that chapter house, there are many local residents supporting and organizing for the monument. Nearly 300 tribal nations endorsed monument

designation, as well as the National Congress of American Indians. We have spoken to monument supporters in San Juan County, both native and non-native, who have expressed private support for the monument, but cannot speak publicly for fear they might lose their job or livelihood in the local area. Economic development opportunities for local communities near designated national monuments have been shown to increase (see Headwaters Economics), and we believe Bears Ears Monument Designation has already led and will continue to lead to similar economic stimulation.

vi. Over time, the availability of federal resources is likely to increase to manage the area, provided its designation as a monument remains. Many BLM lands lack the funding needed to properly enforce laws (e.g. to prevent looting) or manage the area. Visitors and local residents can lobby to greater effect for increased funding for a designated monument.

vii. Our staff and at least 60 members (many from Utah) participated in the Bluff public hearing, July 2016. The hearing allowed equal representation of all voices through a lottery system – those in favor were the majority. Our members submitted public comments in other forums as well. Nearly 70 members camped for 5 nights at Bears Ears in 2016 to understand the proposed monument and meet with Navajo and Ute tribal members. Members wrote letters to the former president, Interior secretary, Congressional representatives and the Utah delegation over many years.

We humbly request that you recognize the extensive public input by local citizens and those from regions invested in Americas\'s public lands, as well as thousands of citizens who expressed support for monument designation at Bears Ears. Please keep the monument as is.

Shelley Silbert  
Executive Director