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May 24, 2017

Monument Review, MS-1530
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Letter in support of preserving Bears Ears National Monument

Dear Secretary Zinke,

Great Salt Lake Audubon (GSLA), a chapter of the National Audubon Society appreciates the opportunity to provide comments on the Bears Ears National Monument. Established in 1912, GSLA is the oldest conservation organization in Utah with over 1,400 members. As a conservation leader in Utah our longstanding mission is to protect and enhance habitat for wild birds, animals, and plants, and to maintain healthy and diverse environments for wildlife and people throughout the State of Utah. Given our mission, GSLA **strongly opposes** reversing Bears Ears National Monument designation. Arguments used by the State of Utah Congressional Delegation and Governor regarding monument designation are disingenuous at best and ignore the significant, collaborative effort undertaken to establish the monument. It was not a “federal land grab”; the land is already federal land and is owned by every citizen in this country. If there is a “land grab” it is by the State of UT who would deny Bears Ears natural and cultural resources to the current and future citizens of the United States. Additionally, the monument designation process **was** highly collaborative including all stakeholders, both those for and against; those communities adjoining the monument and communities across Utah; Native Americans; and the Utah Congressional Delegation and Governor. No groups were excluded during this process. Our comments regarding why Bears Ears should remain a national monument are presented below.

Bears Ears is one of the most significant archeological sites in the United States. It is estimated that there are over 100,000 Native American cultural sites in Bears Ears important to 5 Native American tribes, Hopi, Navajo, Ute Mountain Ute, Ute, and Zuni. These cultural sites provide a

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record of human habitation that extends over 13,000 years from Clovis People to ancestral Puebloans to modern day Native Americans. Over 5,000 years of human habitation is documented by the petroglyphs and pictographs in the monument area. These cultural resources have not been adequately protected from looting and vandalism. The theft and destruction of the antiquities in this area represents a significant loss to all Americans, specifically our Native Americans, who consider the antiquities sacred. Our cultural resources are priceless and must be protected for future generations of all Americans. Monument status is the first step in ensuring that policies protecting our cultural resources are enacted and enforced.

Bears Ears is very ecologically diverse; there are few places on earth that provide the habitat diversity that is found in Bears Ears. Riparian, grassland, upland sage, forest, sub-alpine, alpine, and desert habitats all occur within Bears Ears, supporting many diverse species of plants and wildlife. In addition to the more common plants, the rare Kachina Daisy and regionally endemic Alcove Columbine and Cave Primrose are found in this area. Wildlife includes mammals, birds, amphibians, and reptiles and a host of invertebrates. Game species such as elk, deer, and big-horn sheep that use this area provide hunting opportunities for sportspersons and wildlife viewing for non-consumptive users. Many species of birds also use this area. The Manti-La Sal National Forest within Bears Ears provides the largest contiguous critical habitat for the threatened Mexican Spotted Owl. Additionally Bears Ears also includes habitat for the endangered Southwestern Willow Flycatcher. Monument status will ensure protection of habitat and wildlife for the enjoyment of future generations.

The Bears Ears National Monument proclamation **protects** traditional Native American and ranching uses. As stated in the Bears Ears Monument Declaration: *"Nothing in this proclamation shall be deemed to enlarge or diminish the rights or jurisdiction of any Indian tribe. The Secretaries shall, to the maximum extent permitted by law and in consultation with Indian tribes, ensure the protection of Indian sacred sites and traditional cultural properties in the monument and provide access by members of Indian tribes for traditional cultural and customary uses, consistent with the American Indian Religious Freedom Act (42 U.S.C. 1996) and Executive Order 13007 of May 24, 1996 (Indian Sacred Sites), including collection of medicines, berries and other vegetation, forest products, and firewood for personal noncommercial use in a manner consistent with the care and management of the objects identified above."* In addition, the Monument is to be managed by the DOI in conjunction with the Native American Tribes in recognition and support of this area to their beliefs and traditional ways of life. In relation to traditional ranching: *"Laws, regulations, and policies followed by USFS or BLM in issuing and administering grazing permits or leases on lands under their jurisdiction shall continue to apply with regard to the lands in the monument to ensure the ongoing consistency with the care and management of the objects identified above"*. Along with the natural and cultural resources, Bears Ears monument designation protects our traditional land uses for current and future generations.

Monument designation does not impact State involvement in monument management or impact private landowners within or adjacent to the national monument. As stated in the monument proclamation: *"Nothing in this proclamation shall be deemed to enlarge or diminish the jurisdiction of the State of Utah, including its jurisdiction and authority with respect to fish*

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and wildlife management". The Bears Ears fact sheet (BLM and USFS) clarifies that the: "The national monument designation will not impact the rights of private landowners within or adjacent to the national monument, including existing access within the national monument boundary". National monument designation is protective of the State and protective of private landowners.

The monument proclamation ensures that there will be local involvement in developing the Bears Ears management plan: *"The Secretaries shall provide for maximum public involvement in the development of that plan including, but not limited to, consultation with federally recognized tribes and State and local governments" and "The Secretaries, through the BLM and USFS, shall establish an advisory committee under the Federal Advisory Committee Act (5 U.S.C. App.) to provide information and advice regarding the development of the management plan and, as appropriate, management of the monument. This advisory committee shall consist of a fair and balanced representation of interested stakeholders, including State and local governments, tribes, recreational users, local business owners, and private landowners".* This process ensures that **all stakeholders** will be part of the process and that **all interests** will be represented and incorporated into the management plan. This will not happen if the monument designation is reversed.

Rather than harming funding for schools provided by School Trust Lands, the monument designation will ensure that appropriate action is taken to ensure the value of school trust lands is acknowledged and compensated: As stated in the monument proclamation: *"To further the protective purposes of the monument, the Secretary of the Interior shall explore entering into a memorandum of understanding with the State that would set forth terms, pursuant to applicable laws and regulations, for an exchange of land currently owned by the State of Utah and administered by the Utah School and Institutional Trust Lands Administration within the boundary of the monument for land of approximately equal value managed by the BLM outside the boundary of the monument".*

Finally, the Bears Ears Monument protects Canyonlands National Park by including sensitive lands such as the Indian Creek Area and associated cultural resources, such as Newspaper Rock, that adjoin the park that would otherwise be subject to exploitation.

The concept of Bears Ears National Monument is not new. Over the past 80 years, the Bears Ears area has been proposed for protection by Members of Congress, Secretaries of Interior, State and Tribal leaders, and local conservationists. Additionally, in recognition of the importance of the natural and cultural resources of this area, Representative Bishop's (R-UT) Public Lands Initiative (2013-2016) proposed the area currently included in Bears Ears National Monument as a National Conservation Area. There has been much collaboration and compromise in developing the current boundaries of and allowed uses in Bears Ears. Areas that are mineral rich were removed from the area included in the monument to avoid potential development and revenue loss conflict, the monument acreage was reduced by approximately 550,000 acres from that originally requested by the Native American Tribes, grazing and public access provisions remain, military operations were not compromised, it provides for a sorely needed transportation plan, it protects Native Americans' right for traditional activities within

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Bears Ears, it protects Native American and State of Utah's involvement in monument management, and most importantly it protects an incredible landscape rich in cultural and natural resources. The extraordinary landscape and natural and cultural resources of Bears Ears are a globally recognized treasure. We have heard that people are concerned that if Bears Ears remains a national monument, hordes of people will descend and it will turn into another "Moab". But what this tells us is that American people and indeed, people from all over the world need protected places to go to "recharge their batteries", to relax, and to enjoy the tremendous gift of our wild places. There is nothing as democratic as our National Monuments and Parks. They are the great equalizers, anyone can visit, regardless of economic, racial, etc. status. To rescind monument status of this spectacular area would be a travesty to all those who have worked so hard and for so long for its establishment and for that which has no voice -- habitat and wildlife.

Sincerely,

A handwritten signature in black ink that reads "Heather Dove". The signature is written in a cursive style with a large initial 'H' and a long, sweeping underline.

Heather Dove
President, Great Salt Lake Audubon

President@greatsaltlakeaudubon.org