



May 22, 2017

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

**RE: Public Land Solutions Comments to Bears Ears National Monument Review**

Dear BLM Planners,

Public Land Solutions welcomes this opportunity to comment on the U.S. Department of the Interior review of Bears Ears National Monuments designated under the Antiquities Act of 1906, pursuant to Executive Order 13792 of April 26, 2017 (82 FR 20429, May 1, 2017). Public Land Solutions is a Moab, Utah-based 501(c)(3) non-profit organization dedicated to providing comprehensive recreation planning and stakeholder coordination to support effective and sustainable public land solutions.

We are confident that this review will show that the process leading to the Bears Ears National Monument designation adequately incorporated public outreach and coordination with relevant stakeholders, and conforms to the requirements of the Antiquities Act of 1906 for designating national monuments. In addition, with this new monument the people of San Juan County have an unprecedented opportunity to shape their economic destiny by determining what type of visitors and residents they wish to attract—and where they want those visitors to go. Growth in the region is inevitable, and San Juan County is well-positioned to utilize its rich cultural history and fascinating landscapes to create a well-planned economic development strategy of its own making.

On April 20, 2017, Public Land Solutions released a white paper—*Economic Development Planning for Cultural Tourism in Bears Ears National Monument*—detailing the potential economic benefits of cultural tourism around the recently designated Bears Ears National Monument. The report draws on research and case studies from other areas in the American West that have taken a pro-active approach to cultural tourism on public land as an economic driver through county and stakeholder strategic planning. San Juan County has many comparable, and in fact more advantageous, attributes that make it possible for it to follow a similar strategy: the region is deeply valued by the five tribes of The Bears Ears Tribal Coalition, it contains majestic canyons, rivers and mountains that provide world-class outdoor recreation opportunities, including rock climbing, hunting, hiking, backpacking, and whitewater rafting. Bears Ears is also filled with abundant rock art, ancient cliff dwellings, and ceremonial sites, including The Cedar Mesa region, which holds one of the largest concentrations of preserved archaeological resources in the world.

Outdoor recreation on public land is a powerful economic driver for Utah. While other parts of the state have been able to diversify their economies by attracting visitors and businesses that value the state's recreation assets and world class landscapes, San Juan County's economy has not seen the full benefits. The conversation about the Bears Ears National Monument is already increasing visitation to the region, which will continue to grow. The question is: how can local stakeholders and county government control and direct that growth to maximize benefits to local residents?

*Economic Development Planning for Cultural Tourism in Bears Ears National Monument* emphasizes that in order to harness the potential of the monument and its affect on residents, San Juan County officials and stakeholders should take the opportunity not only to provide input throughout the land management planning process that will be led by the US Forest Service and the Bureau of Land Management, but should also consider developing their own complementary economic plan. This plan would focus on issues such as community zoning guidance, hotel and restaurant needs, and make recommendations on the number of visitors the communities in the region can accommodate.

Should you choose to pursue a legal battle over the status of the region, we fear that you will discourage and delay investment in new businesses. While we agree that there is a strong need to protect traditional lifestyles in the area, a lengthy legal dispute will do nothing to change the underlying economics which are effecting traditional industries. In effect, a legal battle over the Bears Ears will trap the region in an economic limbo that will be a true disservice to the residents.

The process leading to the Bears Ears National Monument designation appropriately incorporated public outreach and coordination with relevant stakeholders, and conforms to the requirements of the Antiquities Act of 1906. Importantly, the designation of Bears Ears National Monument provides local residents an outstanding opportunity to improve economic conditions in the region. Public Land Solutions urges the administration to preserve the Presidential Proclamation of December 28, 2016 that established the Bears Ears National Monument, provide adequate funding for a monument management plan, and protect the very promising economic opportunities presented by the new monument.

Best regards,



Ashley Korenblat  
Managing Director  
Public Land Solutions