



July 6, 2017

The Honorable Ryan Zinke  
Secretary, Department of the Interior,  
1849 C Street NW  
Washington, DC 20240

**RE: Public Land Solutions Response Interim Report on Bears Ears National Monument**

Dear Interior Secretary Ryan Zinke:

Public Land Solutions writes today in response to your June 10, 2017 Interim Report Pursuant to Executive Order 13792. This letter supplements Public Land Solutions' May 22, 2017 comment letter to the U.S. Department of the Interior review of Bears Ears National Monument 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.

Public Land Solutions' May 22 comment letter expressed our confidence 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. 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.

Shrinking the boundary of BENM is unlikely to bring additional revenue to the area, as resource extraction has been available on those lands for decades yet those leases and claims remain undeveloped. And reducing the size of the monument is very likely to undermine future visitor opportunities in the area and the potential for San Juan County to develop a viable recreation economy in addition to its traditional industries.

While ideological fights continue to rage in Utah over land control, the land itself continues to suffer. Cedar Mesa contains some of the richest archeological areas in the world, yet it lacks even basic management resources and continues to suffer from damaging public use and looting. Indian Creek is a world class climbing area yet it also suffers from very little management while visitor use numbers skyrocket. Removing the monument designation for these areas will make such problems worse. Bears Ears doesn't need less resources—it needs more, especially in the way of infrastructure improvements to accommodate new and increasing visitors.

In your own words, you've noted that a budget decrease is bad for the Interior Department. By reducing the BENM boundary and triggering certain litigation, you will further poison local politics and contribute more to the problem of an under-resourced BLM. This will in turn force

the area into economic limbo for the foreseeable future, inhibiting badly needed investments in San Juan County which remains the poorest in Utah. Instead, your office could act to support local residents with an economic development plan for the region that is sure to produce jobs. By supporting the existing monument boundary and promoting a positive economic agenda, you have the opportunity to bring true prosperity to the region while preserving traditional uses and lifestyles. In a recent trip to the area, we saw several backcountry and front-country sites that are fragile and unprepared for increased visitation. While we understand that the political landscape is complex, the ultimate responsibility for the actual landscape remains yours, and there are a wide variety of public-private partnerships available to support you in upholding that responsibility.

Public Land Solutions recently released a white paper— *Economic Development Planning for Cultural Tourism in Bears Ears National Monument*—illustrates 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 communities that have taken an active approach to using cultural tourism and associated planning on public land as an economic driver. San Juan County has many advantageous attributes that make it possible for it to follow a similar strategy. In order to harness the potential of the monument and its benefits to residents, San Juan County officials and stakeholders should take the opportunity not only to provide input throughout the land management planning process, but should also consider developing a complementary economic development plan.

We urge you to consider the significant negative consequences of taking executive action to abolish or downsize BENM. As we emphasized in our comment letter, should you choose to pursue a legal battle over the monument status of Bears Ears, we fear that you will discourage and delay investment in new businesses. While there is a need to protect traditional lifestyles in the area, a lengthy legal dispute will do nothing to change the underlying economics which control the historic boom and bust nature of San Juan County's 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 its residents. The economic opportunities presented by BENM combined with the world class cultural resources and recreation in the area, is the envy of countless communities across the West. Any diminishment of BENM, however, will be very destructive to the area economically and only feed the poisonous political climate in the region.

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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. The designation of Bears Ears National Monument delivers local residents a unique and enviable opportunity to improve local economic conditions. 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. Please let us know if you have any questions or comments.

Best regards,

A handwritten signature in black ink, appearing to read "Jason Keith". The signature is written in a cursive, flowing style with some loops and flourishes.

Jason Keith  
Managing Director  
Public Land Solutions