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May 26, 2017

Secretary Zinke  
US Department of the Interior  
Washington DC

Dear Secretary Zinke:

Here are the comments of Wilderness Watch on the proposal to review the Bears Ears National Monument. Wilderness Watch is a national nonprofit wilderness conservation organization focused on the protection and proper stewardship of the National Wilderness Preservation System.

Many of our members and I personally have been experiencing the lands in the Bears Ears monument for several decades. The entire region is a national treasure deserving the highest level of protection. Within the monument lies the Dark Canyon Wilderness and numerous BLM wilderness study areas and national forest roadless lands. Bears Ears is an ecological, archaeological and scenic treasure, as well as sacred ground for the Native Americans in the region. While we were pleased that President Obama established the Bears Ears NM, we were disappointed he chose to designate only about 2/3 of the land that should have been included—as proposed by the coalition of Native American tribes—and that he didn't provide the level of protection from livestock grazing and industrial-strength recreation the area deserves.

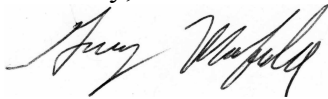
The Dark Canyon Wilderness is within the boundary of the existing Bears Ears National Monument, and is mentioned in the proclamation. De-designation or diminishment of the monument in size or protection could have a negative effect on the Dark Canyon Wilderness. For example, much of the area surrounding Dark Canyon was available for mineral leasing and development, logging, and unregulated off-road vehicle use, all of which do or could degrade Dark Canyon. Moreover, the boundary of the Wilderness in places is along a had-to-locate elevation line. Loss of protection of surrounding land could lead to inadvertent violation of the Wilderness.

Bears Ears National Monument should serve as a primitive and undeveloped monument, with no new infrastructure, roads or road reconstruction. Those who venture there would do so on their own terms, without all the trappings of civilization. It should be an experience not based upon monetization or consumption, what unfortunately defines outdoor recreation today, rather on

connecting with a largely unmodified environment. The experience of encountering the wildlands and archaeological values of the area in the way the earliest people and later the explorers and settlers did is an authentic experience worth preserving. As Aldo Leopold noted, “. . . recreational development is a job not of building roads into lovely country, but of building receptivity into the still unlovely human mind.” The emphasis on consumption, gadgets (which Leopold bemoaned), and infrastructure—commodifying nature—detract from the experience of re-creation.

If the Interior Department wants to take the appropriate step, it could increase protection and/or size of this monument. It could amend the proclamation to remove emphasis on various recreational and economic factors, and establish a monument for all the right reasons. Such a monument would be even more worthy of the name.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Macfarlane".

Gary Macfarlane  
Board Member