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July 10, 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 several national monuments. Wilderness Watch has already sent in comments on the Bears Ears National Monument to you. Please also consider those comments in your continuing deliberations on 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.

A quick review of the monument boundaries shows there are thirty separate Wildernesses with land inside the Monument boundaries. The following Table illustrates the extent of the interconnectedness. In addition, several Wildernesses also border the National Monuments, and several roadless lands or wilderness study areas are contained within them, including some monuments that currently have no designated Wilderness.

Monuments with Wilderness

<u>Monument</u>	<u>Wilderness</u>
Basin and Range Mountains	Worthington
Bears Ears	Dark Canyon
Berryessa Snow Mountain	Cache Creek, Snow Mountain and Cedar Roughs
Cascade Siskiyou	Soda Mountain
Craters of the Moon	Craters of the Moon

Giant Sequoia	Monarch and Golden Trout (a very small portion of the latter)
Golden Butte	Lime Canyon and Jumbo Springs
Grand Canyon-Parashant	Paiute, Grand Wash Cliffs, Mount Logan and Mount Trumbull
Mojave Trails	Sheephole Valley, Trilobite, Clipper Mountain, Bigelow Cholla Gardens, Piute Mountains, and Cadiz Dunes
San Gabriel Mountains	Magic Mountain, Pleasant View Ridge, San Gabriel and Sheep Mountain
Sand to Snow	San Gorgonio
Sonoran Desert	North Maricopa Mountains, South Maricopa Mountains and Table Top
Vermillion Cliffs	Paria Canyon-Vermillion Cliffs

Many of our members have personally been experiencing the lands in the above noted monuments and others for several decades. The proclamations for the monuments and the information the agencies maintain detail the importance of these areas from ecological, archaeological, scenic, geological and cultural grounds. For example, the Giant Sequoia National Monument proclamation recognizes, “[m]agnificent groves of towering giant sequoias, the world’s largest trees” and includes “an extraordinary number of habitats within a relatively small area. This spectrum of ecosystems is home to a diverse array of plants and animals, many of which are rare or endemic to the southern Sierra Nevada.” The proclamation for the Basin and Range Monument notes rare “geologic features” such as “natural arches, caves” and the ancient “Alamo bolide impact.” One of three caves, “Leviathan Cave” boasts outstanding “stalactites, stalagmites, flow stones, soda straws, a cave shield, and rim pools.” Regarding cultural values:

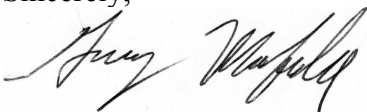
The earliest Paleo-Indian inhabitants of the Basin and Range area exploited food sources along the shores of now-dry lakes. These nomadic people left important traces of their presence, including a rare obsidian Clovis point in the Coal Valley Water Gap and a succession of significant campsites and artifacts around the prehistoric Coal Valley Lake.

These are only two examples that attest to the Monuments values. If anything, some of the Monuments have too little protection or are too small. De-designation or diminishment of the monuments in size or protection could have a negative effect on the Wildernesses contained within them. Monument designation benefits Wilderness by providing additional protections to the lands surrounding the Wilderness, thereby enhancing the ecological value and strengthening wilderness values like solitude.

Many of the Monuments should serve as a primitive and undeveloped monument, with no new infrastructure, roads or road reconstruction. Indeed, monuments are protected for reasons of historical, cultural, geological and ecological import, rather than for recreational development purposes. 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 than on connecting with a largely unmodified environment. The experience of encountering the wildlands 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 (as opposed to recreation).

If the Interior Department wants to take the appropriate step, it should look at increasing the size or protection of the list of monuments. It could evaluate whether the proclamations are protective enough. That might include proposals to remove emphasis on various recreational and economic factors or prohibitions on actions that degrade the Monuments. This would be a process to truly evaluate National Monuments for the benefit of current and future generations, including the other life forms that depend on them.

Sincerely,



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