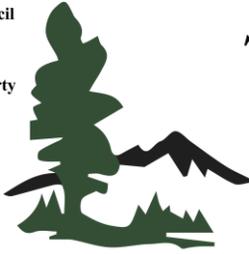


Executive Council
Brenda Barrett
Maria Burks
Mark Butler
Maureen Finnerty
Phil Francis
David Graber
Don Hellmann
Doug Morris
Mike Murray
Dick Ring
Sheridan Steele
Kate Stevenson
Pat Tiller



The Coalition To Protect America's National Parks

Voices of Experience

ELECTRONIC SUBMISSION – NO HARD COPY TO FOLLOW

July 5, 2017

The Honorable Ryan Zinke, Secretary
c/o Monument Review, MS-1530,
U.S. Department of the Interior
1849 C Street NW.
Washington, DC 20240

Subject: Comments on Department of the Interior Docket No. DOI-2017-0002

Dear Secretary Zinke:

I am writing to you on behalf of over 1,300 members of the Coalition to Protect America's National Parks (Coalition), who collectively represent more than 30,000 years of national park management experience. The Coalition studies, educates, and advocates for the preservation of America's public lands. Our membership includes former National Park Service (NPS) employees who have worked in and managed national monuments, planned and managed new units of America's National Park System, and who have managed units of the National Park System adjacent to national monuments managed by other federal agencies.

We submit the following comments in response to Department of the Interior Docket No. DOI-2017-0002, "Review of Certain National Monuments Established Since 1996, Notice of Opportunity for Public Comment." Note: We previously submitted comments dated May 25, 2017, to assure their consideration with respect to Bears Ears National Monument. We incorporate those comments by reference, and hereby submit additional comments regarding the other national monuments identified for review in the Notice.

BACKGROUND

Executive Order 13792 of April 26, 2017 (82 FR 20429, May 1, 2017) directed the Secretary of the Interior to review certain national monuments designated or expanded under the Antiquities Act of 1906, 54 U.S.C. 320301-320303 (Act). Specifically, Section 2 of the Executive Order directed the Secretary to conduct a review of all Presidential designations or expansions of designations under the Antiquities Act made since January 1, 1996, where the designation covers more than 100,000 acres, where the designation after expansion covers more than 100,000 acres, or where the Secretary determines that the designation or expansion was made without adequate public outreach and coordination with relevant stakeholders, to determine whether each designation or expansion conforms to the policy set forth in section 1 of the order. Among other provisions, Section 1 states that designations should reflect the Act's "requirements and original objectives" and "appropriately balance the protection of landmarks, structures, and objects against the appropriate use of Federal lands and the effects on surrounding lands and communities."

According to the Notice referenced above, the Secretary will use this review to determine whether each designation or expansion conforms to the policy stated in the Executive Order and to formulate

recommendations for Presidential actions, legislative proposals, or other appropriate actions to carry out that policy. The Notice identifies twenty-seven (27) national monuments that are subject to review. The national monuments and their respective managing agencies are as follows:

National Monuments Being Initially Reviewed Pursuant to Criteria in Executive Order 13792

Monument	Location	Year(s)	Acreage	Managing Agency(s)
Basin and Range	Nevada	2015	703,585	BLM
Bears Ears	Utah	2016	1,353,000	BLM/USFS
Berryessa Snow Mountain	California	2015	330,780	BLM/USFS
Canyons of the Ancients	Colorado	2000	175,160	BLM
Carrizo Plain	California	2001	204,107	BLM
Cascade Siskiyou	Oregon	2000/2017	100,000	BLM
Craters of the Moon	Idaho	1924/2000	737,525	NPS/BLM
Giant Sequoia	California	2000	327,760	USFS
Gold Butte	Nevada	2016	296,937	BLM
Grand Canyon-Parashant	Arizona	2000	1,014,000	BLM/NPS
Grand Staircase-Escalante	Utah	1996	1,700,000	BLM
Hanford Reach	Washington	2000	194,450.93	FWS/DOE
Ironwood Forest	Arizona	2000	128,917	BLM
Mojave Trails	California	2016	1,600,000	BLM
Organ Mountains-Desert Peaks	New Mexico	2014	496,330	BLM
Rio Grande del Norte	New Mexico	2013	242,555	BLM
Sand to Snow	California	2016	154,000	BLM/USFS
San Gabriel Mountains	California	2014	346,177	USFS
Sonoran Desert	Arizona	2001	486,149	BLM
Upper Missouri River Breaks	Montana	2001	377,346	BLM
Vermilion Cliffs	Arizona	2000	279,568	BLM

National Monuments Being Reviewed To Determine Whether the Designation or Expansion Was Made Without Adequate Public Outreach and Coordination With Relevant Stakeholders

Katahdin Woods and Waters	Maine	2016	87,563	NPS
---------------------------	-------	------	--------	-----

Marine National Monuments Being Reviewed Pursuant to Executive Orders 13795 and 13792

Marianas Trench	CNMI/Pacific Ocean	2009	60,938,240	NOAA/FWS
Northeast Canyons and Seamounts	Atlantic Ocean	2016	3,114,320	NOAA/FWS
Pacific Remote Islands	Pacific Ocean	2009	55,608,320	NOAA/FWS
Papahānaumokuākea	Hawaii	2006/2016	89,600,000	NOAA/FWS
Rose Atoll	American Samoa	2009	8,609,045	NOAA/FWS

OVERVIEW AND GENERAL COMMENTS

Since 1906 numerous U.S. presidents have exercised their authority under the Antiquities Act to designate national monuments, including many that are units of the National Park System today. As a national parks advocacy group, the Coalition typically focuses on issues directly impacting parks or the “System.” However, because the Antiquities Act has historically played such a key role in the establishment of so many of our nation’s “crown jewel” parks, we are expanding our traditional focus to defend the values of ALL national monuments under review and to defend the fundamental value and purpose of the Antiquities Act itself. We very much believe in preserving all of these special places that have been set aside under the Act for the American people.

The variety and richness of the cultural and natural resources protected within the 27 national monuments under review are best described in the Proclamations that created them (see Appendix A). Each Proclamation sets forth the historic and scientific objects, including extraordinary natural and cultural features, to be protected by the monument designation. In our experience, the quality and variety of resources being conserved within the 27 national monuments, individually and collectively, is comparable to that of the many other national monuments that are not under review. Suffice it to say that these national monuments protect for present and future generations an incredibly diverse collection of significant archeological, historical, and cultural resources and sites; in addition, they protect exceptional biological, ecological, and geological resources, as well as spectacular scenery. Preservation of such “objects of historic and scientific interest” is entirely consistent with the purpose of national monument designation and §320301(a) of the Act, which states:

The President may, in the President's discretion, declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated on land owned or controlled by the Federal Government to be national monuments.

In our letter dated June 7, 2017 (attached), we expressed our belief that this review of already established national monuments is a poor use of time and money for everyone. Past Presidents complied with the Act in designating these monuments, and the current President has no authority to abolish or materially change them. This review is especially misguided with respect to the many monuments under review which were designated years ago and are currently operating under an approved management plan. These monuments have already benefitted from additional focused and constructive public processes (*i.e.*, more site-specific, structured, and systematic than this 27-monument review process). Any changes to their management should be made ONLY through a legitimate management plan review process in accord with each agency’s standard practices that already include extensive public involvement. With respect to the monuments designated more recently, the most appropriate next step is to follow through on preparation of the management plan following each agency’s standard practices with extensive public involvement. Such planning would be the appropriate forum to identify and evaluate minor changes in the size or boundaries of the monument, or recommendations for changes through legislation, and should lead to fully reviewed decisions about what uses and activities are appropriate. See Appendix B for the management plan status of all monuments under review.

The Administration’s reasons for undertaking this unprecedented (and slapdash) review of 27 established national monuments strike us as primarily partisan and political, which is supremely disappointing. As you know, there is a long history of political and local opposition to the creation of national monuments, but this opposition typically transforms over time to grateful support. Such initial opposition can be loud and personal, and often comes from individuals or commercial interests who have benefitted or hope to benefit from consumption or exploitation of the monument’s resources. Moreover, such initial opposition has too often been based more on emotion and misinformation than on facts and understanding.

For over 100 years, those initially opposed to the designation of national monuments have asserted that the designation would adversely affect local economies by restricting existing uses. And, for over 100 years, such

arguments have proved to be wrong. Many of the national monuments that our members managed during their careers served as significant economic engines for their regions. We urge your review of a report prepared by Headwaters Economics entitled "The Economic Importance of National Monuments to Communities"¹, based upon their study of the economic impacts of 17 national monuments in western states. Fourteen of these monuments are included in your review, namely: Canyons of the Ancients; Carrizo Plain; Cascade Siskyou; Craters of the Moon; Giant Sequoia; Grand Canyon-Parashant; Grand Staircase-Escalante; Hanford Reach; Ironwood Forest; Organ Mountains-Desert Peaks; Rio Grande del Norte; Sonoran Desert; Upper Missouri River Breaks; and Vermillion Cliffs.

As reported on the Headwaters Economics website:

- The updated 2017 results—like the earlier studies in 2011 and 2014—found that the local economies surrounding all 17 of the national monuments studied expanded following the creation of the new national monuments
- Traditional economic indicators—population, employment, personal income, and per-capita income—increased after creation of the monuments.
- 13 of 17 communities adjacent to the national monuments grew at the same or a faster pace compared to similar counties in their state; four were slower.
- While the results showing continued growth in nearby communities does not demonstrate an absolute and certain cause-and-effect relationship, the findings clearly demonstrate that there is no evidence that the new national monuments prevented economic growth.

The findings in this report are consistent with our experience managing new monuments and other park units. Following establishment of protected areas, visitors, businesses, and others who appreciate the associated amenities start coming to the area, and the local and regional economies benefit. Clearly, establishment of national monuments makes sense not only from a conservation perspective, the primary reason for their designation, but also from an economic perspective, because it leads to sustainable opportunities and benefits for the nearby communities.

COMMENTS ABOUT THE SEVEN “FACTORS” LISTED IN THE EXECUTIVE ORDER

Executive Order 13792 directs the Secretary to consider seven factors. As to the legal issues implicitly raised in these factors with respect to objects, acreage, authority, and other issues, we attach and incorporate in our comments the following articles:

- Memorandum by Arnold & Porter, Kaye Scholer, “The President Has No Power Unilaterally to Abolish or Materially Change a National Monument Designation under the Antiquities Act of 1906” (May 2017)
- Article by Squillace, et al., “Presidents Lack the Authority to Abolish or Diminish National Monuments” (May 2017)
- Article by Mark Squillace, “The Monumental Legacy of the Antiquities Act of 1906, 37 GA. L. Rev. 473 (2003)

Below are additional comments on each of the seven factors.

(i) The requirements and original objectives of the Act, including the Act’s requirement that reservations of land not exceed “the smallest area compatible with the proper care and management of the objects to be protected”

¹ <https://headwaterseconomics.org/public-lands/protected-lands/national-monuments>

The best justification for the designation and size of the respective national monuments is provided in the Presidential Proclamation that created each one. See Appendix A for links to each Proclamation. Based on our members' experience with the process for recommending and establishing national monuments, we know that support for these national monuments, including description of the objects of historic and scientific interest, certification of the appropriate size of the monument, and legal discussion of these and other issues, is provided in the administrative records developed in the course of each monument's establishment, including information provided to the White House by various offices (e.g., the recommending agency, the Council on Environmental Quality, the Department of Justice, the Office of Management and Budget, and others). The Proclamations themselves, and the administrative records that support these national monuments, demonstrate compliance with the Act's requirements and objectives.

(ii) Whether designated lands are appropriately classified under the Act as “historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest”

Under the Act, the authority to create national monuments is vested solely in the President, who is granted broad discretion to determine whether “the historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest” merit such protection and to determine the actual size of “the smallest area compatible with the proper care and management of the objects to be protected.” Federal courts have consistently deferred to the President's authority to use his/her discretion in making these determinations.² Furthermore, throughout the history of implementation of the Antiquities Act, “objects of historic or scientific interest” have been broadly interpreted and affirmed by the courts to include far more than the common dictionary definition of “object” (“anything that is visible or tangible and is relatively stable in form”) would suggest. “Objects of historic or scientific interest” protected under the Act have included massive natural features and landscapes, such as the Grand Canyon and Death Valley; rare or unique ecosystems, habitats, and species of flora and fauna; locations of significant historic events; and sites containing culturally or historically significant man-made objects and structures, such as archeological sites, ruins, forts, and historic sites. The variety of “objects” protected within America's national monuments is grand and diverse. Clearly, the monument designation must be large enough to ensure protection of all the objects identified for preservation in the respective Proclamation. We believe that the impressive listing of cultural and natural features identified in the various monument proclamations, individually and collectively, are appropriately classified as “objects” and merit protection under the Act.

(iii) The effects of a designation on the available uses of designated Federal lands, including consideration of the multiple-use policy of section 102(a)(7) of the Federal Land Policy and Management Act (43 U.S.C. 1701(a)(7)), as well as the effects on the available uses of Federal lands beyond the monument boundaries

Given the number of monuments under review, it is impractical for us to get into a detailed discussion here about each proclamation's provisions; however, we provide links to the various proclamations in Appendix A and hereby incorporate them into our comments. While the effects on existing uses may vary to some extent from monument to monument, there are some general effects that are relevant to every national monument designation. The Proclamations reserve the Federal land within the boundaries of the national monument for the protection, care, and management of the objects of historic or scientific interest. The Proclamations contain standard provisions that, from the earliest proclamations under the Act, have appropriated and withdrawn the Federal lands within the boundaries from disposition and uses that could undermine the protection and care of the objects. While Proclamations occasionally contain specific management prescriptions determined to be necessary for the protection of the objects, most management decisions are left to the agency's management planning process. All the Proclamations make clear that the establishment of the national monuments is subject to valid existing rights and that only the Federal lands and interests in land compose the monument. For national monuments managed by most agencies (e.g., Bureau of Land Management, U.S. Forest Service), the

²Squillace, et al., “Presidents Lack the Authority to Abolish or Diminish National Monuments” (May 2017)

establishment of the national monument does not affect the responsibilities of the respective States related to fish and wildlife management. For national monuments managed by the NPS, the monument becomes a unit of the National Park System and subject to the laws governing that System with regard to fish and wildlife (unless the deed transferring the land to the United States provides otherwise, as with the parcels to the east of the East Branch of the Penobscot River in Katahdin Woods and Waters National Monument). NPS then works in close cooperation with State fish and wildlife management agencies in managing allowed uses. All in all, these provisions are reasonable, appropriate, and necessary to accomplish the objectives of the respective monument's designation.

Impacts of national monument designation on the available uses of Federal lands beyond monument boundaries will be primarily positive, as the monument assures that the exceptional "objects" to be protected by that designation are appropriately considered in regional land management.

(iv) The effects of a designation on the use and enjoyment of non-Federal lands within or beyond monument boundaries

Under the Antiquities Act, national monuments are comprised only of "lands owned or controlled by the Government of the United States." Thus, while the exterior boundaries of a monument may enclose private or state-owned land, the monument does NOT include those lands. Designation of a monument does not affect the rights of owners of non-Federal land in or adjacent to the monument's boundaries to access or use their property, and will have minimal to no effect on the use and enjoyment of non-Federal lands within or beyond monument boundaries. Designation of a monument, however, does assure that the exceptional "objects" that exist on the Federal land can be appropriately considered in decisions about land use.

(v) Concerns of State, tribal, and local governments affected by a designation, including the economic development and fiscal condition of affected States, tribes, and localities

The Coalition does not normally speak for or represent the entities listed in the Factor above. That said, we offer the following observations:

- 1) As previously discussed, there is often some degree of local opposition to the creation of national monuments. Such opposition is often based on fears of adverse economic impacts. However, initial opposition typically changes to support over time, encouraged by positive and sustainable economic growth associated with the establishment of a national monument.
- 2) Some of the Proclamations create and institutionalize a mechanism to ensure local and/or tribal involvement in the planning and management of the respective national monuments. Under the Federal Advisory Committee Act (Pub. L. 92-463)³, advisory committees can be established at other monuments if appropriate. Many members of the Coalition have worked during their NPS careers with advisory committees or commissions that served similar functions as those described in these Proclamations. Such experience teaches the value of such commissions, which significantly strengthen and institutionalize opportunities for effective communication and coordination between the Federal agency and the key stakeholders at the respective national monument.

(vi) The availability of Federal resources to properly manage designated areas; and

With the exception of Katahdin Woods and Waters, which involved private land being donated to the Federal government along with an endowment to support activities at the monument, ALL the Federal lands designated as national monuments that are under review were already being managed, staffed, and operated under the relevant authorities and policies administered by Federal agencies such as BLM, USFS, NPS, or

³<https://www.gsa.gov/portal/content/100916>

FWS prior to creation of a monument. As a result, there may be no need for significant increases in staffing, operating costs, or management of those areas in response to conversion to national monuments. Of course, protection of natural and cultural features was required on these Federal lands before each monument's establishment, and to the extent that such features were and remain vulnerable, additional Federal resources would continue to be helpful. There will, as well, be an initial planning workload in order to develop a monument management plan; however, such work should not unduly burden existing staff. Conceivably, the management plan for each national monument could improve and consolidate management of these Federal lands.

(vii) Such other factors as the Secretary deems appropriate: Review of Katahdin Woods and Waters National Monument To Determine Whether the Designation or Expansion Was Made Without Adequate Public Outreach and Coordination With Relevant Stakeholders

First and foremost, we strongly support the designation of Katahdin Woods and Waters National Monument (KAWW) as described in its Proclamation.⁴ It is a spectacular resource that warrants conservation as a unit of the National Park System.

With regard to your question about whether the national monument designation was made “without adequate public outreach and coordination with relevant stakeholders,” the answer is simple. “NO; outreach was NOT inadequate.” In fact, it was far more than “adequate.” There was extensive public outreach and coordination with relevant stakeholders PRIOR to the designation of Katahdin Woods and Waters National Monument. Coalition members, including several who live in Maine, have followed this issue closely since the concept of creating a unit of the National Park System first surfaced. In recent years there has been extensive news coverage in state-wide newspapers and on local television; and considerable public outreach conducted by national monument proponents, as well as well-publicized public meetings conducted by elected officials (e.g., Congressional field hearings, town hall meetings, etc.), including some meetings involving the NPS Director, NPS staff, and Secretary of the Interior. At the public meetings, national monument supporters vastly outnumbered national monument opponents. This strong level of support has been documented in comment letters received by NPS and others in the Federal government, as well as numerous polls that have consistently indicate the majority of Mainers support the establishment of the national monument.

Note: An excellent description of the extensive public outreach and discussions leading up to the designation of Katahdin Woods and Waters is provided in the written testimony⁵ presented by Mr. Lucas St. Clair before the House Committee on Natural Resources at a hearing on May 2, 2017. We hereby incorporate that testimony into our comments by reference.

Today three out of four members of Maine's congressional delegation support the continued planning, development, and full implementation of Katahdin Woods and Waters NM. With all due respect to Maine's Governor Paul LePage, who is widely known for his contrarian points of view, is now one of the few remaining public officials in Maine who is still an outspoken opponent of Katahdin Woods and Waters National Monument. He was provided numerous opportunities to make his views known before the monument's establishment, and he did, through letters, press releases, op-eds, and comments at public meetings and hearings. Since the national monument's establishment, many businesses in the Katahdin region already report an uptick in business and increased interest in visitation to the area because of the national monument designation. As Senator Angus King recently described⁶:

⁴ <https://obamawhitehouse.archives.gov/the-press-office/2016/08/24/presidential-proclamation-establishment-katahdin-woods-and-waters>

⁵ <http://docs.house.gov/meetings/II/II10/20170502/105937/HHRG-115-II10-Wstate-StClairL-20170502.pdf>

⁶ <http://bangordailynews.com/2017/06/13/opinion/contributors/the-katahdin-region-can-thrive-alongside-the-monument-if-we-allow-it/>

Since the monument's designation last year, I have heard from businesses throughout the area – from hardware store owners, grocers, and lumber retailers to recreational equipment suppliers, lodge and inn operators, and realtors – who have all testified that the monument has been a much-needed boost to their businesses and the regional economy as a whole. In fact, these positive developments have led many local elected officials who once opposed the monument to reverse their positions and work unabashedly to secure its success...The monument is a vital part of [the area's] future, and I firmly believe that the sooner we are able to reaffirm its designation, then the sooner we are able to continue on with healing and rebuilding a region that has experienced too much hardship, too much heartache, and too much division.

We completely agree with Senator King's advice – it is time to reaffirm Katahdin Woods and Waters' designation as a national monument and encourage the Park Service to continue with the management planning process and the development of appropriate visitor facilities!

Comments on the June 10, 2017 “Interim Report on Executive Order 13792” ref. Bears Ears National Monument

The Coalition was deeply disappointed to read your interim report recommendation that President Trump reduce the size of Bears Ears National Monument (BENM). We are particularly concerned with the “results” section set forth on page 5, Section IV, paragraph 2, which states, in part:

Specifically, the review shows that rather than designating an area encompassing almost 1.5 million acres as a national monument, it would have been more appropriate to identify and separate the areas that have significant objects to be protected...Additionally, many of the lands reserved as part of BENM are already congressionally or administratively protected – in some cases, such as designated wilderness or WSA., which may have a higher level of protection – such that designation under the [Antiquities] Act was unnecessary. Moreover, other lands within BENM are more appropriately set aside under another type of special designation, such as national recreation area. For those areas that remain protected under the Act, some management prescriptions appear to be too restrictive...

The proposal to break apart the larger area into multiple smaller units with differing designations reflects a profound lack of understanding of Federal land management practices and policies. Separating and managing multiple special resource areas apart from the intervening and surrounding areas in a piece-meal fashion is fundamentally flawed. Such an approach ignores the context of the special resources within the larger landscape and unnecessarily complicates management and conservation of multiple sites within the same geographic area.

Retaining the integrity of BENM is critical to good land use management for the protection of the objects and the enjoyment of the visitors. Comprehensive land use planning for an extraordinary area like BENM, with a complex variety of resources and uses, allows the identification of management zones based on the kinds and sensitivity of specific protected resources; the kinds of uses and activities occurring or proposed to occur within each zone; and the appropriate management prescriptions for each zone. Such a plan would provide well-coordinated and coherent management guidance for the entire area.

We urge you to direct BLM and USFS to proceed with managing the entire national monument in a coordinated fashion under a joint comprehensive management plan. The plan should be developed with “maximum public involvement” as called for in the Bears Ears Proclamation. The Federal advisory committee and Bears Ears Commission called for in the Proclamation would be the most effective mechanism for ensuring local involvement and transparent consideration of local input. In essence, the process for determining appropriate management and operation of BENM is clearly laid out in the Proclamation.

The interim report also recommends that “the BENM boundary be revised through the use of an appropriate authority, including lawful exercise of the President’s authority granted by the Act (*emphasis added*).” We call your attention to the attached legal articles. Congress has not given the President the legal authority to undo a national monument established under the Antiquities Act in the manner proposed. We are concerned that this recommendation sets the stage for additional attacks on America's public lands, including its national parks.

Closing Thoughts

As we near the end of our comments, we urge you to reflect on the words you spoke during your January 17, 2017 confirmation hearing before the Senate Committee on Energy and Natural Resources. You stated that you are “an unapologetic admirer of Teddy Roosevelt and believe he had it right when he placed under federal protection millions of acres of federal lands.” We could not agree more. So we offer this brief reflection about the legacy of President Teddy Roosevelt, who signed the landmark Antiquities Act in 1906, the Act at the center of your review.

As President, Roosevelt used the Antiquities Act to create 18 national monuments, including the Grand Canyon. During his tenure he also created five national parks; and set aside 51 federal bird sanctuaries, four national game refuges, and more than 100 million acres' worth of national forests. Roosevelt is deservedly acclaimed as one of the most powerful forces in the history of American conservation. In honor of his many contributions to our nation’s public lands legacy, today there are more units of the National Park System dedicated to Roosevelt's life and memory than to any other American.

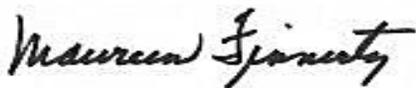
Teddy Roosevelt’s words in the early part of the last century ring true today:

Of all the questions which can come before this nation, short of the actual preservation of its existence in a great war, there is none which compares in importance with the great central task of leaving this land even a better land for our descendants than it is for us.

Mr. Secretary, in your brief tenure at the Department of the Interior, you have already reached a critical fork in the road. Whatever you decide about the fate of these 27 national monuments will contribute greatly to your legacy as Secretary of the Interior, the chief steward of America’s public lands. We hope your decision will reflect the wisdom, values, and conservation ethic so eloquently stated by Teddy Roosevelt over a century ago. We also hope that your decision-making follows the path of so many of the past Presidents and Interior Secretaries who perpetuated and advanced the legacy of preservation and respect for our great landscapes championed by President Roosevelt.

We appreciate the opportunity to comment on this very important issue.

Sincerely,



Maureen Finnerty, Chair
Coalition to Protect America’s National Parks

Email: maureen_finnerty@protectnps.org
Mail: P.O. Box 48092, Washington, DC 20002
Web: www.protectnps.org

Appendices (A and B)
Attachments (4)

Appendix A Link(s)* to Proclamations for the 27 National Monuments

* Link(s) provided in footnotes below

Monument	Location	Year(s)	Acreage	Managing Agency
Basin and Range	NV	2015 ⁷	703,585	BLM
Bears Ears	UT	2016 ⁸	1,353,000	BLM/USFS
Berryessa Snow Mountain	CA	2015 ⁹	330,780	BLM/USFS
Canyons of the Ancients	CO	2000 ¹⁰	175,160	BLM
Carrizo Plain	CA	2001 ¹¹	204,107	BLM
Cascade Siskiyou	OR	2000 ¹² /2017 ¹³	100,000	BLM
Craters of the Moon	ID	1924 ¹⁴ /2000 ¹⁵	737,525	NPS/BLM
Giant Sequoia	CA	2000 ¹⁶	327,760	USFS
Gold Butte	NV	2016 ¹⁷	296,937	BLM
Grand Canyon-Parashant	AZ	2000 ¹⁸	1,014,000	BLM/NPS
Grand Staircase-Escalante	UT	1996 ¹⁹	1,700,000	BLM
Hanford Reach	WA	2000 ²⁰	194,450.93	FWS/DOE
Ironwood Forest	AZ	2000 ²¹	128,917	BLM
Mojave Trails	CA	2016 ²²	1,600,000	BLM
Organ Mountains – Desert Peaks	NM	2014 ²³	496,330	BLM
Rio Grande del Norte	NM	2013 ²⁴	242,555	BLM
Sand to Snow	CA	2016 ²⁵	154,000	BLM/USFS
San Gabriel Mountains	CA	2014 ²⁶	346, 177	USFS

⁷ https://www.blm.gov/nlcs_web/sites/style/medialib/blm/nv/special_areas/basin_and_range_monument.Par.74270.File.dat/15-07-10Proclamation.pdf

⁸ https://www.blm.gov/sites/blm.gov/files/documents/files/2016bearsbearsears.prc_rel.pdf

⁹ <https://obamawhitehouse.archives.gov/the-press-office/2015/07/10/presidential-proclamation-establishment-berryessa-snow-mountain-national>

¹⁰ https://www.blm.gov/nlcs_web/sites/style/medialib/blm/co/programs/NLCS/CanyonsNM/docs.Par.40740.File.dat/CanyonsNM-PresidentialProclam.pdf

¹¹ https://www.blm.gov/nlcs_web/sites/style/medialib/blm/ca/nlcs/Carrizo_Plain_NM/docs.Par.35275.File.dat/Carrizo%20Plain%20Proclamation.pdf

¹² https://www.blm.gov/or/resources/recreation/csnm/files/Proclamation_7318.pdf

¹³ <https://www.gpo.gov/fdsys/pkg/DCPD-201700014/pdf/DCPD-201700014.pdf>

¹⁴ https://www.nps.gov/parkhistory/online_books/crmo/adhi/appb.htm

¹⁵ <https://www.gpo.gov/fdsys/pkg/STATUTE-114/pdf/STATUTE-114-Pg3418.pdf>

¹⁶ <https://www.gpo.gov/fdsys/pkg/WCPD-2000-04-24/pdf/WCPD-2000-04-24-Pg846.pdf>

¹⁷ <https://obamawhitehouse.archives.gov/the-press-office/2016/12/28/presidential-proclamation-establishment-gold-butte-national-monument>

¹⁸ https://www.blm.gov/nlcs_web/sites/style/medialib/blm/az/images/parashant.Par.10414.File.dat/proclamation.pdf

¹⁹ <https://www.gpo.gov/fdsys/pkg/WCPD-1996-09-23/pdf/WCPD-1996-09-23-Pg1788.pdf>

²⁰ <https://www.gpo.gov/fdsys/pkg/CFR-2001-title3-vol1/xml/CFR-2001-title3-vol1-proc7319.xml>

²¹ https://www.fws.gov/uploadedFiles/Region_1/NWRS/Zone_2/Mid-Columbia_River_Complex/Hanford_Reach_National_Monument/Documents/final-ccp.pdf

²² <https://obamawhitehouse.archives.gov/the-press-office/2016/02/12/presidential-proclamation-establishment-mojave-trails-national-monument>

²³ <https://obamawhitehouse.archives.gov/the-press-office/2014/05/21/presidential-proclamation-organ-mountains-desert-peaks-national-monument>

²⁴ <https://obamawhitehouse.archives.gov/the-press-office/2013/03/25/presidential-proclamation-r-o-grande-del-norte-national-monument>

²⁵ <https://obamawhitehouse.archives.gov/the-press-office/2016/02/12/presidential-proclamation-establishment-sand-snow-national-monument>

Sonoran Desert	AZ	2001 ²⁷	486,149	BLM
Upper Missouri Breaks	MT	2001 ²⁸	377,346	BLM
Vermilion Cliffs	AZ	2000 ²⁹	279,568	BLM
Katahdin Woods and Waters	ME	2016 ³⁰	87,563	NPS
Marianas Trench	CNMI/ Pacific Ocean	2009 ³¹	60,938,240	NOAA/FWS
NE Canyons and Seamounts	Atlantic Ocean	2016 ³²	3,114,320	NOAA/FWS
Pacific Remote Islands	Pacific Ocean	2009 ³³ /2014 ³⁴	55,608,320	NOAA/FWS
Papahānaumokuākea	Hawaii	2006 ³⁵ /2016 ³⁶	89,600,000	NOAA/FWS
Rose Atoll	American Samoa	2009 ³⁷	8,609,045	NOAA/FWS

²⁶<https://obamawhitehouse.archives.gov/the-press-office/2014/10/10/presidential-proclamation-san-gabriel-mountains-national-monument>

²⁷<http://www.presidency.ucsb.edu/ws/?pid=62520>

²⁸<http://www.presidency.ucsb.edu/ws/?pid=62516>

²⁹https://www.blm.gov/nlcs_web/sites/style/medialib/blm/az/images/vermilion.Par.13084.File.dat/verm_proc.pdf

³⁰<https://obamawhitehouse.archives.gov/the-press-office/2016/08/24/presidential-proclamation-establishment-katahdin-woods-and-waters>

³¹<http://www.presidency.ucsb.edu/ws/?pid=85406>

³²<https://obamawhitehouse.archives.gov/the-press-office/2016/09/15/presidential-proclamation-northeast-canyons-and-seamounts-marine>

³³<https://georgewbush-whitehouse.archives.gov/news/releases/2009/01/20090106-6.html>

³⁴https://www.fws.gov/uploadedFiles/Region_1/NWRS/Zone_1/Pacific_Remote_Islands_Marine_National_Monument/Documents/Presidential%20Proclamation%209173.pdf

³⁵http://www.papahanaumokuakea.gov/pdf/proclamation_8031.pdf

³⁶<https://obamawhitehouse.archives.gov/the-press-office/2016/08/26/presidential-proclamation-papahanaumokuakea-marine-national-monument>

³⁷<https://georgewbush-whitehouse.archives.gov/news/releases/2009/01/20090106-7.html>

Appendix B**Status of Management Planning for the 27 National Monuments**

Monument	Location	Year(s)	Agency	Status of Mgmt. Plan or Year Completed
Basin and Range	NV	2015	BLM	Initiated 2015 ³⁸
Bears Ears	UT	2016	BLM/USFS	Initiated 2017 ³⁹
Berryessa Snow Mountain	CA	2015	USFS/BLM	Initiated 2017 ⁴⁰
Canyons of the Ancients	CO	2000	BLM	2010 ⁴¹
Carrizo Plain	CA	2001	BLM	2010 ⁴²
Cascade Siskiyou	OR	2000/2017	BLM	2008 ⁴³
Craters of the Moon	ID	1924/2000	NPS/BLM	2006 ⁴⁴
Giant Sequoia	CA	2000	USFS	2012 ⁴⁵
Gold Butte	NV	2016	BLM	Initiation pending ⁴⁶
Grand Canyon-Parashant	AZ	2000	BLM/NPS	2008 ⁴⁷
Grand Staircase-Escalante	UT	1996	BLM	2000 ⁴⁸
Hanford Reach	WA	2000	FWS/DOE	2008 ⁴⁹
Ironwood Forest	AZ	2000	BLM	2013 ⁵⁰
Mojave Trails	CA	2016	BLM	Initiated 2016 ⁵¹
Organ Mountains – Desert Peaks	NM	2014	BLM	Initiated 2016 ⁵²
Rio Grande del Norte	NM	2013	BLM	Initiated 2014 ⁵³
Sand to Snow	CA	2016	BLM/USFS	Initiation pending ⁵⁴
San Gabriel Mountains	CA	2014	USFS	Initiated 2015 ⁵⁵
Sonoran Desert	AZ	2001	BLM	2012 ⁵⁶
Upper Missouri Breaks	MT	2001	BLM	2008 ⁵⁷
Vermilion Cliffs	AZ	2000	BLM	2008 ⁵⁸
Katahdin Woods and Waters	ME	2016	NPS	Initiated 2017 ⁵⁹

³⁸ <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage¤tPageId=88819>

³⁹ <https://www.blm.gov/press-release/next-steps-for-bears-ears-national-monument>

⁴⁰ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd541715.pdf

⁴¹ <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=65701>

⁴² <http://www.npshistory.com/publications/blm/carrizo-plain/rod-rmp-2010.pdf>

⁴³ https://www.blm.gov/sites/blm.gov/files/prog_natlmonu_csnm_rodrrmp_aug2008.pdf

⁴⁴ <https://www.nps.gov/crmo/learn/management/upload/Presentation%20Plan.pdf>

⁴⁵ <https://www.fs.usda.gov/detail/sequoia/landmanagement/planning/?cid=stelprdb5400271>

⁴⁶ <https://www.blm.gov/gold-butte>

⁴⁷ <https://www.nps.gov/para/learn/management/records-of-decision-and-management-plan.htm>

⁴⁸ https://www.eenews.net/assets/2017/04/27/document_ew_02.pdf

⁴⁹ https://www.fws.gov/uploadedFiles/Region_1/NWRS/Zone_2/Mid-Columbia_River_Complex/Hanford_Reach_National_Monument/Documents/final-ccp.pdf

⁵⁰ <https://www.gpo.gov/fdsys/pkg/FR-2013-02-25/pdf/2013-04259.pdf>

⁵¹ [https://www.blm.gov/nlcs_web/sites/style/medialib/blm/ca/pdf/pa/nlcs.Par.20661.File.dat/Envisioning%20Session%20Flyer%20MTNM%202016%20\(508\).pdf](https://www.blm.gov/nlcs_web/sites/style/medialib/blm/ca/pdf/pa/nlcs.Par.20661.File.dat/Envisioning%20Session%20Flyer%20MTNM%202016%20(508).pdf)

⁵² https://www.blm.gov/sites/blm.gov/files/GetInvolved-RAC-NewMexico-LCDO-Minutes-_10.26.16_OMDPRMPSummary.pdf

⁵³ <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=72807>

⁵⁴ <https://www.fs.fed.us/sites/default/files/s2s-gas-final-nomap.pdf>

⁵⁵ <https://www.nationalforests.org/assets/pdfs/San-Gabriel-Mtns-Ntl-Monument-Mgmt-Plan-and-Draft-EA-8-2016.pdf>

⁵⁶ <http://www.npshistory.com/publications/blm/sonoran-desert/rod-rmp-2012.pdf>

⁵⁷ <https://ia801603.us.archive.org/35/items/uppermissouririv00unit/uppermissouririv00unit.pdf>

⁵⁸ <http://www.npshistory.com/publications/blm/vermillion-cliffs/rod-rmp-2008.pdf>

⁵⁹ <https://www.nps.gov/kaww/getinvolved/planning.htm>

Marianas Trench	CNMI/Pacific Ocean	2009	NOAA/FWS	Initiated 2011 ⁶⁰
NE Canyons and Seamounts	Atlantic Ocean	2016	NOAA/FWS	Initiation pending ⁶¹
Pacific Remote Islands	Pacific Ocean	2009/2014	NOAA/FWS	Initiated 2011 ⁶²
Papahānaumokuākea	Hawaii	2006/2016	NOAA/FWS	2008 ⁶³
Rose Atoll	American Samoa	2009	NOAA/FWS	Managed under 2012 MP for Fagatele Bay NMS ⁶⁴ & 2014 CCP for Rose Atoll NWR ⁶⁵

⁶⁰ https://www.fws.gov/refuge/Mariana_Trench_Marine_National_Monument/what_we_do/planning.html

⁶¹ https://www.greateratlantic.fisheries.noaa.gov/mediacenter/2016/september/22_northeast_canyons_and_seamounts_faq.html

⁶² https://www.fws.gov/uploadedFiles/Region_1/NWRS/Zone_1/Pacific_Remote_Islands_Marine_National_Monument/Documents/PR%20MNM%20Planning%20Update%209-6-2011%20sgl%20pages.pdf

⁶³ http://www.papahanaumokuakea.gov/management/mp/vol1_mmp08.pdf

⁶⁴ http://americansamoa.noaa.gov/management/pdfs/fbnms_mp_eis.pdf

⁶⁵ [https://www.fws.gov/uploadedFiles/Region_1/NWRS/Zone_1/Pacific_Reefs_Complex/Rose_Atoll/Documents/Chapter%201\(1\).pdf](https://www.fws.gov/uploadedFiles/Region_1/NWRS/Zone_1/Pacific_Reefs_Complex/Rose_Atoll/Documents/Chapter%201(1).pdf)