May 26, 2017

Docket ID: DOI-2017-0002-0001
Monument Review, MS-1530
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

The American Sheep Industry Association (ASI) appreciates the opportunity to comment on the Bears Ears National Monument. Since 1865, ASI has been the national trade organization representing the interests of nearly 90,000 sheep ranchers, located throughout the country, who produce America’s lamb and wool. ASI is a federation of forty-five state sheep associations and individual members, representing a diverse industry which has an immense interest in land management issues.

Our nation’s public lands are not just an integral part of the range livestock industry, but provide a variety of benefits and uses to all Americans. The continued reservation of these lands without local input not only causes multiple-use to be displaced, but restricts management options available to ensure the sustainability of natural resources. That is why the American Sheep Industry Association joins with other stakeholders to oppose the Bears Ears monument designation and call for reform of the Antiquities Act.

The Antiquities Act requires monument designations be confined to the smallest area compatible with the proper care and management of the objects to be protected. However, at more than 1 million acres, it is clear that the Bears Ears Monument far exceeds even the broadest definition of that scope.

It is important to recognize that all our nation’s public lands are strictly regulated. Any activities from livestock grazing to mineral extraction must be permitted and found ecologically sound. Adding special designations like a monument status to these lands does not further the public interest or encourage recreation. It only serves to tighten multiple-use and management of these natural resources.

Our nation’s public lands have been recognized for well over a century as a tremendous resource for not only commercial benefit, but also recreation. Activities like grazing, forestry, hunting, camping and hiking provide value to not only the participants, but the local economy. The best way to protect those uses into the future is not through a special designation, but rather by its absence, keeping these lands open for multiple-use for future generations.

We request that the Bears Ears monument designation be rescinded and that the administration work with the state and local government on future designations.

Sincerely,

Peter Orwick, Executive Director
American Sheep Industry Association