



July 10, 2017

Monument Review

MS-1530

U.S. Department of the Interior

1849 C Street NW

Washington, DC 20240

Re: federal register notice numbered 82 FR 22016 published May 11, 2017

Dear Secretary Zinke:

Founded in 1906, The Mountaineers is a nonprofit dedicated to helping people explore, conserve, learn about, and enjoy the lands and waters of the Pacific Northwest and beyond. With 12,500 members, our community offers thousands of volunteer-led courses, activities, and events each year that connect people to the outdoors. The Mountaineers' conservation advocacy program is Washington's leading voice for protecting the outdoor experience and conserving the wild places where we play.

Mountaineers youth programs provide over 6,000 opportunities each year for children to get outside. Mountaineers Books expands our passion for the outdoors internationally through award-winning instructional guides, adventure narratives, and conservation photography. We are a passionate, engaged, and knowledgeable community that cares about the outdoors and protecting the outdoor experience for current and future generations.

We write today submitting comments in support of the 27 National Monuments under review and in support of the Antiquities Act.

We believe that the idea of revisiting Monument designations through anything other than the legislative process is a deeply troubling step that undermines the integrity of the Antiquities Act. The Act, a bedrock conservation law signed by Theodore Roosevelt, has led to far-sighted protections for iconic landscapes across the country that celebrate American heritage, Native American culture, civil rights, and exceptional natural and scientific resources. These places also afford the public invaluable outdoor recreation opportunities that allow Americans to enjoy, appreciate, and experience the protected objects of historic and scientific interest: our heritage includes landscapes and features both large and small.

While recreation is not an explicit purpose for protections under the Antiquities Act, it has been one of the secondary benefits of these protections. The National Monuments under review by the Administration contain and protect some extraordinary recreation opportunities and recreation is often the means through which the public experiences the objects of interest protected under the Act. From canoeing and kayaking Hanford Reach National Monument to climbing opportunities at Indian Creek protected by Bears Ears, outdoor recreationists are able to experience a range of the superlative landscapes and cultural resources protected on our country's public lands.



This recreation also supports national recreation economy that generates \$887 billion in annual consumer spending. National monuments specifically have provided economic benefits to surrounding communities by boosting outdoor recreation, travel, and tourism. These communities have also clearly shown net job gains. Our nation's massive recreational economy provides an incredible opportunity as we work to steward our public lands for the benefit of all.

The Mountaineers also places great value in public input from a wide range of stakeholders - locals as well as all citizen co-owners of our country's public lands - on all land management decisions, including National Monument designations. Given the years of diverse stakeholder input that ultimately leads to the designation of new National Monuments, we are disheartened by the idea that a brief comment period would in some way correct for a perceived lack of public input.

As a Washington-based organization, we want to specifically highlight the value and importance of Hanford Reach National Monument:

The Hanford Reach of the Columbia River extends from the upper end of McNary Dam Reservoir to Priest Rapids Dam and represents the last free-flowing stretch of the Columbia River. The segment of river within the National Monument and the surrounding shrub-steppe ecosystem have been a cultural crossroads for centuries as the fishing and hunting grounds for the tribes that today make up the Yakama Indian Nation, Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe, and Wanapum tribe. In addition to the cultural history of the Monument, scientific objects of interest include the incredibly diversity of plant and animal species that take advantage of the intact riparian habitat, geology of the White Bluffs, diversity of birds, and the last remaining spawning habitat for fall Chinook salmon on the main stem Columbia.

That these historical and scientific objects are in such pristine condition is due in part to the historical legacy of developing atomic weapons on the Hanford Nuclear Reservation and the acquisition of the lands surrounding the Nuclear Reservation by the federal government as a security buffer.

Today the 46.5-mile segment of the Hanford Reach of the Columbia River within the Monument is the main focus of visitor use and provides the primary opportunity for the general public to experience the objects of cultural and scientific interest. The Hanford Reach has grown in popularity as a destination for kayaking and canoeing. In the two decades since the Monument was established, use has grown from less than 20,000 visitors at the time of designation to 43,000 annual visitors today.

The effort to protect the Hanford Reach included extensive public engagement that our members participated in. In 1988, Congress passed legislation to initiate the Hanford Reach Comprehensive River Conservation Study, resulting in a full review of the Reach by the National Park Service. The public process launched by the National Park Service included robust opportunities for public involvement over a six-year period resulting in a final recommendation for designation as a National Wildlife Refuge and a Wild and Scenic River. President Clinton acted in a manner consistent with the recommendations of this study in establishing the Monument. Following the designation of the Monument, the Comprehensive Conservation Plan was developed through extensive public engagement in which our members participated, and the final plan was published in 2008. This plan provides the management framework for protection of the cultural and scientific objects that define the Monument, and includes guidance on



enhancing opportunities for the public to experience and enjoy this wild and undeveloped reach of the Columbia River.

In closing, we believe that the National Monument designations of the past two decades are precisely what was intended when Theodore Roosevelt signed the Antiquities Act into law. We fully support our National Monuments and oppose any steps that would diminish protections for these landscapes.

Sincerely,

Katherine Hollis
Conservation and Advocacy Director
The Mountaineers