



July 10, 2017

Docket ID: DOI-2017-0002
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 National Monuments designated or expanded since 1996 under the Antiquities Act of 1906. 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, representing a diverse industry which has an immense stake in land management issues.

As we have stated in previous comments specific to certain monument designations; 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 elevation of protections on these lands without local input not only causes multiple-use to be displaced, but restricts management options available to ensure the continued maintenance of our natural resources. For these reasons, the American Sheep Industry Association joins with other stakeholders to support rolling back past monument designations to the smallest possible area compatible with the proper care and management of the objects to be protected, and urges executive adherence to that statutory obligation in future designations.

While the clear text of the Antiquities Act of 1906 requires monument designations to be confined to the smallest area compatible, abuse of the Antiquities Act has continued under administrations of both parties since 1996, as is clear from the list of monuments in Executive Order 13792 and Marine National Monuments listed in Executive Orders 13795 and 13792.

It is important to recognize that all of our nation's public lands are strictly regulated, absent monument status. 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 restrict management of these natural resources.

Therefore, we request the Secretary of the Interior to review all monument designations since 1996. America's sheep producers contend that these monument designations exceed statutory authority in their size and scope, and that said designations across the board were made without meaningful public outreach and local stakeholder input.

Our nation's public lands have been recognized for well over a century as a tremendous resource for not only commercial benefit to the public, 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 support the Secretary and the administration in reducing any or all of the monument designations under review and encourage the President to work with state and local governments on future designations.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Orwick". The signature is fluid and cursive, with a large initial "P" and "O".

Peter Orwick, Executive Director
American Sheep Industry Association