Perspectives of Bears Ears: A Content Analysis of the 2017 National Monument Review

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Bears Ears National Monument: A Content Analysis of Stakeholder Perspectives and Land Values Presented in the National Monument Review

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Abstract

Bears Ears National Monument is a focal point for controversy over the executive use of the Antiquities Act. Its initial designation in 2016 and subsequent review and downsizing in 2017 are tied to the values of regional and national stakeholders, particularly regarding land and land use, as well as the cultural and political history of San Juan County, Utah. Through content analysis of a sample of public comments submitted to the 2017 National Monument Review, this thesis contextualizes and analyzes the perspectives, land values, and policy preferences of national and local stakeholders including advocacy groups, the Bears Ears Inter-Tribal Coalition, residents of San Juan County, and others regarding the proposed alteration of BENM. Among respondents to the National Monument Review, utility/economic valuations of Bears Ears are most commonly presented, but differences in valuations and perspectives exist between different stakeholder groups. Additionally, this thesis investigates the disruptive role form comments and the public comment platform of Regulations.gov play in providing representative feedback on land management plans. The results of this thesis reflect the relationships between stakeholder groups and land values, particularly utility and moral/spiritual values, and support the inclusion of valuation studies in land management decisions.
Preface

I distinctly remember an experience from when I was 11 or 12, when, after falling asleep on the drive to Canyonlands National Park, I awoke to the alien landscape of the Bears Ears region. Watching the Wingate Sandstone cliffs of Indian Creek whir by the windows of our Ford Explorer, I was mesmerized by the landscape, the poetry of the blue sky and red cliffs, the wildflowers hiding in the shade, the junipers and pinyon pines on the canyon rim, and the elaborate petroglyphs and the history they symbolize preserved on the desert walls. The unexpected and otherworldly beauty of San Juan County, deeply and permanently impressed in my mind, progressed into a passion for the desert landscape and, eventually, this thesis.

The following ten years were filled with trips to the Bears Ears region to backpack, hike, and camp. The landscape and the diverse cultural connections of Southern Utahns to the landscape brought me back, and during the 2015 drafting process for the Utah Public Lands Initiative, I was drawn to the political landscape of Bears Ears and its management as well. When National Monument status was conferred and shortly thereafter rescinded for much of the region, I was intrigued by the connection between land management and the different stakeholders, ideas, values and identities which determine such management. This relationship between diverse ideas and management policy is the topic of this thesis.

I would like to thank my advisers Lydia Lawhon, Stacey Schulte, and Dale Miller for their continuous assistance and guidance throughout my thesis, as well as Sadie Babits and Scott Carrier for their motivational influence on my thesis and my passion for the physical and cultural landscapes of Southern Utah.
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Introduction

On December 28th, 2016, 1.3 million acres of sandstone canyons and forested peaks were protected via a Presidential Proclamation by President Barack Obama as Bears Ears National Monument (BENM), co-managed by the BLM, USFS, and the Bears Ears Inter-Tribal Coalition composed of the Navajo Nation, Hopi Tribe, Ute Indian Tribe, Ute Mountain Ute Tribe, and Zuni Tribe. This designation, controversial given longstanding attitudes of locals to federal oversight, the impacts of tourism, and partisan land management disagreements, among other criticisms, faced rumors of rescindment and resizing when the Trump administration took office. In May of 2017, Executive Order 13792 required the review of 27 national monuments, with BENM as the primary target of the scrutiny. In implementing this executive order, over two million comments were collected nationally, with respondents suggesting preferred policy outcomes—typically, either reduction/elimination or expansion/maintenance of protections—along with an explanation for policy preferences. These comments and the voices behind them are the focus of this thesis.

Through a content analysis of a sample of these public comments, this thesis investigates the following questions:

1. Who are the different stakeholders involved in the National Monument Review of Bears Ears and what are their policy preferences?

2. How do stakeholders represent values, concerns, and policy preferences through the public comment medium?

3. What role do form comments, in contrast to unique comments or tribal comments, play in the communication of values and policy preferences between stakeholders and land managers?
4. How can a better understanding of stakeholder perspectives inform a long-term strategy for the management of Bears Ears National Monument?

Through analysis of public comments and investigation into the sociopolitical context of the Bears Ears region, this thesis attempts to gain a better understanding of the different perspectives, arguments, land values, and stakeholders influencing the contemporary policies of BENM. The findings presented in the following pages, in conjunction with relevant studies, will help contribute to a constructive discourse on the management of BENM, and on a larger scale, federal lands, in accordance with the values and concerns of different stakeholder groups.
History and Context

Before investigating the contemporary history of the Bears Ears Region, it is important to understand the role of natural history within the context of Bears Ears and the policies managing the use of Bears Ears National Monument (BENM). Located in a remote and arid corner of Southeastern Utah, the Bears Ears region contains an array of elevations, climate types, geologic regions, and ecosystems. These ecosystems, which remain 92% intact when compared to ecosystems pre-human modification, support above-average mammal and reptile diversity and a high species richness, providing home and refuge to endangered species (Dickson et al., 2017). The flora of the region is similarly variable: from 3,790 to 10,360 feet, riparian Cottonwoods and willows give way to desert salt brush, verdant grasslands, pinyon-juniper forests, and ultimately the cool, moist mixed conifer forests of the high mountains (Schwinning et al., 2008). Springs and seeps dot the canyon walls and mountain slopes, providing niche ecosystems for rare plants in unexpected places.
Geologically, the Bears Ears region also shows scientifically and industrially valuable diversity. The igneous intrusions of the Abajo Mountains, which have provided industrial materials for Archaic cultures and modern societies alike, contain small gold, copper, and silver stocks pursued by now-abandoned mines; similar resources can be found in the Monument Upwarp laccolith southwest of the Abajo Mountains (Witkend, 1964). To the west of the Abajos and lower in elevation, sedimentary rocks of the Colorado Plateau contain uranium and vanadium deposits, particularly within Moenkapi and Chinle formations; elsewhere, coal, oil and natural gas deposits lie beneath sandstone caprocks and salt formations (Witkend, 1964).

The endowments of these natural resources, however, are vastly outnumbered by sandstone, shale, mudstone, and other clastic sedimentary rock layers. The region is well known for its red sandstone layers, such as found in the Navajo or Kayenta formations, which contain rare fossil evidence of the Early Jurassic Era (Margherita, 2016). Paleontologists recognize the Bears Ears region as the only North American site containing fossilized vertebrate fauna from this period, and one of the only sites in the world. Because of unique erosive forces and a rare level of geologic stability, the fossils found within Bears Ears are some of the most well-preserved and prominently displayed.

Cultural History

In addition to the natural and environmental contexts of Bears Ears, a basic understanding of the cultural history of southeast Utah is required to understand stakeholder perspectives and develop a long-term strategy for the management of Bears Ears National Monument.

Ancestors of Today’s Local Stakeholders: Early Native American Presence

Ultimately, the cultural resources of Bears Ears led to the designation of BENM under the Antiquities Act. Containing “one of the densest and most significant cultural landscapes in
the United States,” the historical and cosmological roots of five modern tribes are well documented through the archaeological record (Obama, 2016, para. 1). For over 12,000 years, the Bears Ears Region has been continuously inhabited by indigenous peoples, as documented by Ice Age artifacts, countless pictographs, tens of thousands of residential and spiritual structures, and the oldest baskets unearthed in North America (Margheriti, 2016). The region preserves a history of nomadic and agricultural peoples since the Clovis people, yet the most prominent cultural features and the most significant populations in Bears Ears were established by the Ancestral Puebloan societies.

From 1060 to 1270 CE, the Chaco Phenomenon, a cultural movement expressed through technological and architectural development, swept through Bears Ears, prompting the creation of many of the region’s iconic cliff dwellings, granaries, and plateau-topping towers (Lipe, 2012). The resident dwellings found across Cedar Mesa and Bears Ears, including Doll House Ruin, House on Fire, and Moon House Ruin, among thousands of others, and the many kivas, or ceremonial pits of the Chacoan people, provide evidence for a culturally united society which populated San Juan County. Moki-steps, or foot holes carved into the sandstone walls, show a skill and determination, and petroglyphs illuminated only during solstices or growing periods indicate a scientific precision and a keen awareness of the natural world and its cycles (Margheriti, 2016). Symbolic shrines and “viewsheds,” placed in geologically spectacular locations, indicate a cultural respect for the Bears Ears region (Lipe, 2012, p.3). The cultural landscape of the region was, and continues to be, deeply intertwined with its physical landscape, and the cultures originating from the Puebloan share a deep connection to the land.

Later, following large-scale emigration of the area’s residents, new cultures established a presence in the Bears Ears Region, including today’s Hopi, Ute, Paiute, and Navajo people.
These cultures, with histories rooted in Ancestral Puebloan heritage, expanding neighboring societies, and displacement from the colonized Midwest, shifted the cultural landscape of Bears Ears, bringing with them new horses, new languages, new settlement styles, and new artistic patterns (Margherita, 2016). Hogans, pottery, and pictographs outline the 19th and 20th century residence of Bears Ears by Navajo shepherders, some of whom used the region’s canyons to escape relocation and The Long Walk (Obama, 2016, para. 6). Culturally, these more recent peoples have tied their cultural and spiritual values and identities to landscapes; history and legends, such as the frozen soldiers represented in the sandstone pillars of the Valley of the Gods, give the region’s indigenous peoples a cultural and historical claim to the Bears Ears region.

Early Mormon Pioneers

Beginning in the late 19th century, the first lasting colonial presence impacted the region with the 1880 settlement of Bluff, Utah by Mormon pioneers (Meinig, 1965). Early Mormon settlers crossed through the Hole-in-the-Rock Trail to the Bears Ears region, bringing wagons, livestock, and a righteous conviction that they were the inheritors of the area, claiming their “promised land” (Trainor, 2008). Pushed from settlements in Palmyra, New York, Kirkland, Missouri, and Nauvoo, Illinois by religious persecution and embarking on a quest for Zion, the Mormon pioneers of Utah came with an established religious and cultural identity, with a vision of a state operated by church leadership—the Mormon Prophet and the Quorum of the Twelve Apostles—acting under the direction of their God. As such, governance, settlement, ranching, and culture were all functions of religion, and the influence of Mormon settlers on the region’s resources and culture was not happenstance but religious commandment.
The new wave of Mormon residents brought new patterns and magnitudes of agriculture, grazing, and ranching, and in establishing Bluff and other communities, such as Blanding and Monticello, these Mormon pioneers fundamentally changed the physical landscape. By grazing thousands of cattle and sheep in the sensitive grasslands of the greater Bears Ears region, Southern Utahns fundamentally changed the landscape, decimating nitrogen-sequestering cryptobiotic soils and drastically increasing erosion (Fernandez, Neff & Reynolds, 2008). These ecological changes have had a lasting environmental legacy: invasive species, such as cheatgrass, have established themselves in the disturbed ecosystems, vegetation cover has been reduced by 20% in areas used by livestock, and soil organic carbon and nitrogen have been reduced by approximately 56% (Fernandez, Neff & Reynolds, 2008). There are few economic alternatives to ranching for modern residents to Bears Ears, and the impact of such historical practices still have a large impact on the land.

In the mid-20th century, with high national demand for uranium and vanadium, the Bears Ears region, which contains the “highest-grade uranium mines and deposits in the United States,” experienced a surge in industrial use and an elevated economic value—what was once a largely barren land, in the eyes of settlers, now held metaphorical gold in the form of uranium (Energy Fuels Inc., 2018). The legacy of San Juan County’s era of uranium mining lives on through a plethora of two-track roads, abandoned mineshafts, and haphazard ladders scaling cliffsides, once leading hopeful prospectors to colorful sandstone layers rich in radioactive ores.

Apart from developing the natural resources of the land, pioneers, ranchers, farmers, and miners also developed new cultural landscapes, values, and colonial mindsets, which have had lasting impacts on the values people ascribe to the land and attitudes towards land management. New perspectives of human-landscape relationships have drastically impacted the land use and
management of the Bears Ears landscape; as such, the disparity between the perspectives of
different land management stakeholder groups, rooted in the ancestral heritage of Native
American and Mormon residents to the region, has culminated in modern conflicts over land
management.

Modern Stakeholders of Bears Ears: Influence and Perspectives of Native American Residents

Equally important to the Bears Ears narrative to its history are the modern residents of
Southeastern Utah. Five different Native American Tribes—the Hopi, Zuni, Ute Mountain Ute,
Ute, and Dine—trace cosmological or ancestral connections to BENM, and as such, these tribes
maintain a close connection with the land through symbolic, physical, and traditional connection
to the land (Bears Ears Inter-Tribal Coalition, 2016). Both the presidential proclamation
implementing the initial designation of BENM and the Bears Ears Intertribal Coalition see the
indigenous people as “the beating heart of Bears Ears,” and, as such, “protecting living Native
peoples access to the landscape ensures that it’s special qualities” are preserved (Goodman,
2016). Through ceremonies and a connection with ancestral heritage, many Native Americans
visit the region on a spiritual basis, while others hunt, gather firewood, or forage for traditional
nuts, herbs, and medicines, or rely on drainages within the Monument’s original borders for
water. As such, a physical and spiritual dependence on the land is more than just a historic
memory, but a current element of identity.

Despite present and historic ties to the Bears Ears landscape, the cultural landscape and
the very characteristics which make the region valuable are threatened through “looting, grave
robbing, vandalism, and destruction of cultural sites… (which) literally rob Native American
people of spiritual connections, as well as a sense of place and history (Bears Ears Inter-Tribal
Coalition, 2018, para. 3).” Historic sites, including dwellings and Ancestral Puebloan remains,
have been illegally damaged or removed—according to the Bears Ears Inter-Tribal Coalition (2018), “more than a dozen serious looting cases were reported between May 2014 and April 2015,” and mining and energy development, irresponsible motorized travel, and uneducated visitors all threaten the cultural landscape of Bears Ears. From the dismantlement of 19th century Navajo hogans, or shelters to the permanent destruction of rock art through graffiti and the development of access roads and mines, the Bears Ears Inter-Tribal Coalition has seen a fundamental change to the cultural landscape of Bears Ears with increased visitation over the past ten years. As such, the Coalition views federal protection through Monument status as the most effective way to preserve the area’s cultural resources for the tribal identity of future generations.

The region’s history of degraded rights and representation in management, however, can be seen in exclusionary gerrymandering of San Juan County voting districts and in the Bureau of Reclamation’s creation of Lake Powell, which forms the western border of much of the original BENM. In 1963, Bureau of Reclamation officials closed off the unimpeded flow of the Colorado River through Glen Canyon, indiscriminately decimating cultural and historical sites and inhabited Navajo communities, displacing hundreds of Dine from a spiritual and ancestral homeland while offering little compensation for regional residents (Dickey, 2011, p. 6). In an attempt to modernize the region, the Navajo people were left with a degraded homeland, and without equal distribution of benefits, the Navajo experience substantially higher poverty rates and lower rates of education and employment than the national average, compounded by a lack of utility infrastructure (Dickey, 2011, p. 13). This is only one of many examples of disregard for Native American wellbeing in the land management policies of Southern Utah. The historic federal land management policies in the region help explain the strong preference for
preservation exhibited through the formation of groups such as the Bears Ears Inter-Tribal Coalition, a nonprofit group dedicated to the creation and tribal management of BENM.

In mobilizing around environmental ethics, the Bears Ears Intertribal Coalition furthers the cause of preserving the homeland of different tribes and emphasizes the modern relationship between Native American tribes and their physical landscapes. This coalition, created by the leaders of tribal leaders of five tribes, is held together by aligning core values and policy preferences among the different member tribes. Furthermore, the alliance between the Bears Ears Intertribal Coalition and the wilderness advocate group SUWA illustrates the strategic recognition of shared values, severing historic racial lines between mainstream environmentalism and Native American people (Goodman, 2016, p.23). Other indigenous groups, such as Utah Dineh-Bikeyah, have similarly aligned with environmentalist values in partnerships with Patagonia and the Access Fund.

The parallels between indigenous values and identity in BENM and in neighboring Grand Staircase-Escalante National Monument (GSENEM), which was also included in the National Monument Review and reduced in size by a 2017 executive order, are also worth noting. Within GSENEM, identity-forming cultural and spiritual values are ascribed to the land, water, plants, and animals by members of the Paiute Tribe, with no clear distinction between human identity and the landscape; the indigenous populations of the area, as a result, supported the creation of GSENEM in 1996, which contributed to limited tribal participation in management (Trainor, 2008, p. 341). According to a series of interviews, Trainor (2008) asserts that the predominately moral value and life support values which the Paiute and six other stakeholder tribes attribute to the landscape “constitutes a significant part of their identity,” leading to a relationship of “respect and honor” paralleled by the five tribes connected to BENM. Despite this relationship,
tribes in the region have had limited consultation with managers, and the cultural relationship between Southern Utah’s indigenous population and the landscape has been historically underrepresented (Trainor, 2008).

**Influence and Perspectives of Mormon Residents**

In addition to indigenous residents, cultures, and beliefs, the Mormon residents of San Juan County and Southeastern Utah also exercise the influence of their deeply held beliefs and heritage perspectives. In addition to the unique geology and history of Southern Utah, the current influence, culturally and politically, of religion, specifically the Mormon, or LDS, Church, is regionally distinct and critical in understanding conflict and resistance surrounding BENM.

For many long-time residents of San Juan County, a heritage perspective and religious beliefs contribute to a sense of place and belonging attached to BENM. To this day, descendants of Mormon pioneers view a God-given ownership and entitlement to the land, with a religious mission and responsibility dating back to the 1800s to settle the desert of Southern Utah (Trainor, 2008, p. 343). The LDS Church “(emphasizes) and (reproduces) values that place humans in hierarchical relation above nature, revering agriculture as an occupation and a way to get closer to God (Trainor, 2008).”

An additional factor contributing to the views of many Mormon residents of Southern Utah on the management of BENM is a negative perception towards federal land management and a lasting animosity towards non-local, non-Mormon influence on the “promised land” of Utah. A cultural history of religious suppression from the government and a social narrative of exclusion both contribute to present distrust in the federal government, and this view has led to a vehement rejection of GSENM and federal management of the region (Trainor, 2008, p.333). In a study of neighboring Garfield and Kane counties, descendants of Mormon pioneers cited their
religious background, shared by a majority of southern Utahns, as a critical component to a rejection of Grand Staircase-Escalante National Monument in 1996 (p.343). In the words of Trainor, “the bitterness and resentment that many long-time residents of Kane and Garfield counties express toward the federal government and federal land managers in particular may originate in this cultural history of animosity between the church and the federal government (p. 345).” Culturally, few distinctions delineate Kane and Garfield Counties from San Juan County, home of BENM, and the same factors influencing the hostile response to GSENM’s designation in 1996 were represented in the response of local Mormon pioneer descendants to BENM’s 2016 designation.

One nuance of the general hierarchical positioning of humans and industry over the land is the moral responsibility of stewardship. According to The Church of Jesus Christ of Latter-Day Saints (2018), the official website of the Mormon church, “God first created the earth and all living things spiritually, and all living things have great worth in His eyes,” and “God intends His creations to be aesthetically pleasing to enliven the mind and spirit, and some portions are to be preserved. Making the earth ugly offends Him.” These beliefs and the implications of these beliefs, as discussed by Bryner (2010), leave many Mormons, particularly in Utah’s urban centers, to acknowledge and act on environmental values, but primarily behind values of utility—fundamentally, the land exists within the general Mormon worldview as a gift for its residents, and ownership of the land is granted to people of the Mormon faith.

**Influence and Perspectives of Wilderness Advocates**

A third group of stakeholders, often in partnership with the region’s Native American population but distinct in its motives and demographics, are wilderness advocates. Represented by nonprofit organizations such as the Southern Utah Wilderness Alliance (SUWA), Friends of
Cedar Mesa, Sierra Club, and Friends of Indian Creek, as well as groups and businesses with overlapping interests such as the Access Fund, a climbing advocacy group, Patagonia, an outdoor retailer, or the aforementioned Bears Ears Intertribal Coalition, the region’s wilderness advocates emphasize the recreational and spiritual significance of unpopulated and minimally developed spaces. Predominately white and affluent, wilderness advocates emphasize the non-economic values of the landscape, encompassing a broad range of beliefs and preferred outcomes (Trainor, 2008).

These values are often based on the work of romanticists and transcendentalists such as Emmerson, Thoreau, and Muir, who emphasized the importance of reverence and protection for natural areas, and modern authors such as Wallace Stegner and Edward Abbey, who both advocated relentlessly for protections of the greater canyonlands area. From the books of environmentalist authors to the immersive multimedia experiences found on websites such as bearsears.patagonia.com, wilderness advocates are unified by values of the preservation of nature for non-utility values, both aesthetic and moral/spiritual (Trainor, 2008).

An Era of Recreation and Visitors

The rising influence of wilderness advocates in the region’s land management is linked to the increasing influence of recreation on the Bears Ears Region, as many wilderness advocates are also recreational visitors or residents involved in the recreational opportunities of Southern Utah. With endless hiking, climbing, canyoneering, or sightseeing opportunities, the Bears Ears region has seen an overwhelming influence of recreational visitors—Mountain Project (2018), the most widely used collaborative climbing guidebook, documents 1,222 rock climbs within Indian Creek alone. These recreational visitors change the stakeholder dynamics of the Bears
Ears Landscape and can benefit local economies, but also threaten the cultural and natural resources of Bears Ears.

From the backcountry destinations of Cedar Mesa’s Grand Gulch to the climbing opportunities at Indian Creek and the OHV trails of Arch Canyon, the varied recreational access provided by the Bears Ears region creates economic opportunity and growth in the surrounding towns of Monticello, Blanding, Bluff, Hinksville, and Moab. In 17 similar scenarios, where large National Monuments have been designated in rural areas over the past 30 years, all surrounding economies and per capita incomes grew, and over 80% of these economies grew at rates faster than in comparable peer economies (Mehl, 2017). This growth, a product of greater, more organized recreational access and cultural resource protection, has the potential to support the diversification of local economies currently dependent on natural resource endowments and to improve quality of life in San Juan County.

Increased visitation, however, has also brought negative consequences to the cultural landscape of Bears Ears. After surveying the impacts of visitation on Pueblo I cultural resources in Bears Ears, Lipe (2012) concluded: “as the number of visitors who come primarily to ‘see the ruins’ increases, inadvertent damage (e.g., leaning on fragile walls) and casual vandalism (e.g., graffiti on cliff walls) also increases.” Damages to cultural resources are a concern of both critics and advocates of National Monument protection, illustrating the diverse influences of core beliefs on policy preferences. Advocates for BENM point to the mitigating impact of rangers, enhanced monitoring of cultural resources, and informational materials, which would accompany National Monument designation, on looting, damage, and vandalism, while critics of the Monument reference the inevitable damage caused by increased visitation accompanying National Monument designations.
Many recreational visitors to the Bears Ears region, however, are also residents of the surrounding communities, wilderness advocates, Native Americans, or combinations of these different stakeholder groups; as such, recreational visitors encompass different values and perspectives than other stakeholder groups (Trainor, 2008). Unlike resident stakeholders who often share cultural, political, and ancestral backgrounds, recreational visitors encompass a greater diversity of experiences, histories, land values, and core beliefs.

**Resistance to Federal Land Management in the American West**

A discussion on the context of the National Monument Review and the policies creating and changing the Bears Ears landscape would be incomplete without a review of the history of federal land management resistance in the American West. In addition to historic values of self-governance and autonomy among Utah’s Mormon pioneers, who settled much of the west in search of separation from existing governments and communities, Western legacies of freedom and independence manifested themselves through the resistance of federal management of Western lands.

In 1857, the first clashes between Utah’s isolationist Mormon communities and the federal government took place. Known as the Mormon Rebellion, 2,500 federal troops moved to enforce federal law, particularly concerning the practice of polygamy, in Utah; the armed conflict resulted in at least 42 casualties, and further entrenched divisions between the federal government and Mormon pioneers (Carter, 1958). Ideological and political friction between Mormon colonists and the federal government extended to all facets of life, including taxation and land use and management. Frictions between Utah’s colonists and colonial descendants simmered throughout the 19th and 20th centuries, flaring up in instances of regulation and imprisonment.
Under these long-standing conflicts and the distinct identities of Western pioneers and settlers from federal agencies, the seeds of the Sagebrush Rebellion and land management conflict of today were sown. In 1976, the Federal Land Policy and Management Act (FLPMA) effectively ended the settlement of new lands, securing federal landholdings through the Bureau of Land Management and the Forest Service and normalizing management procedures on federal land. In addition to the National Environmental Policy Act (NEPA), which was passed in 1969, the FLPMA enhanced the influence of federal regulations on land uses in Southern Utah, particularly regarding grazing and mining procedures, and drew the ire of many Western communities, which had benefitted from the relative lawlessness granted by the secluded pastures and resources of the West (Croft, 2015). These communities, which felt threatened and disenfranchised by the changing political and economic environment of the West, provided the nuclei for the Sagebrush Rebellion.

In the late 20th century, the rural West’s ranchers, miners, and loggers found voice in the Sagebrush Rebellion and its accompanying “Wise Use” movement. By placing greater economic valuations on the land, maintaining positions of land management, particularly within the BLM, and vocally resisting the expansion of federal regulations in the West, Sagebrush Rebels gained popularity and political support: even Ronald Reagan claimed to identify with the group, reportedly stating “count me in as a Rebel” (Peeples, 2005). Through expressions of power, Sagebrush Rebels expressed discontent with the changing status quo; 1979’s bulldozing of Grandstaff Canyon (which lies just eight miles Northeast of the former boundaries of BENM) by a Grand County Resident demonstrates the blatant disrespect for Wilderness Study Areas created by FLPMA and encapsulates the frustrations held by Southern Utahns following measures of increased federal management (Wheeler, 1988).
Federal responses to the Sagebrush Rebellion, particularly during the Reagan Administration, granted concessions to the Sagebrush Rebels, but the Rebels’ resistance to federal land and the informal privatization of federally managed lands through lax enforcement of restrictions on BLM and USFS lands continued (Keiter and Ruple, 2015). The designation of Grand Staircase-Escalante National Monument in 1996 enraged many Sagebrush Rebels, particularly in its direct repression of a growing energy industry and its limited engagement with local communities, reigniting issues of sovereignty and management underlying the Sagebrush Rebellion and the Wise Use Movement (Trainor, 2008). Following Clinton’s 1996 use of the Antiquities Act to protect GSENM, actions of federal agencies, particular on a national level, no longer seemed to represent the interests of local residents and settlers, and the lack of meaningful communication between lawmakers and loggers, ranchers, and miners further distanced Utahns from the federal government (Petrzelka, Marguart-Pyatt & Malin, 2013). Political trust in Utah had eroded further than the canyons federal agencies, Native American residents, and wilderness advocates looked to preserve.

Western resistance to federal land management and assertions of local and state authority have exhibited themselves recently; a resurgence of the Sagebrush Rebellion, particularly in the 2014 conflict between Cliven Bundy, a Nevadan rancher openly and illegally grazing cattle without BLM permits since 1993 (Croft, 2015). The radical resurgence of the Sagebrush Rebellion demonstrated by the Bundy conflict drew sympathy from many residents in Southern Utah, including then-San Juan County Commissioner Phil Lyman. In 2014, Lyman protested OHV restrictions within the area which would later become Bears Ears by illegally leading a group of ATV riders, including members of the Bundy family, through Recapture Canyon outside of Blanding, Utah, which had been closed to motorized travel since 2007 due to
archaeological resources (Law, 2014). By blatantly riding through the closed Recapture Canyon, Lyman, an elected official, challenged the authority of the federal government and demanded the reinstatement of local autonomy. The same underlying views of federal overreach and individual sovereignty led to Oregon’s violent 2016 Malheur National Wildlife Refuge occupation and standoff. The perceived change in power and freedom, particularly to the descendants of Mormon settlers, intensified the push for privatization and energy development of the Bears Ears region, created a massive mistrust of government agencies in Southern Utah, and established the Sagebrush Rebel mentality which pervades the mindset of many of Bears Ears critics.

As places are “the sites we not only live in (or on) but which we make our own by investing them with meaning,” the influence of Native American tribes, the Mormon Church, recreational visitors, sagebrush rebels, and wilderness advocates on Southern Utah as a collective “place” are critical to understanding the best management practices for the landscape and its stakeholders (Post, 2013).

**Management Plans**

To determine local land management policies both outside and within National Monuments, federal agencies, such as the Bureau of Land Management and the US Forest Service, must balance the land values and management wishes of the visitors and users of public lands, managing the land in a way that aligns with the sense of place established by different stakeholders. Growing tourism, national coverage of areas within Bears Ears, and nationalized efforts among environmental groups, among other factors, have rapidly escalated the number of stakeholders in land conflicts such as the management of BENM, and as such, appealing to the values and demands of different stakeholders has become more complicated. Urban visitors and commenters, who hold claim to federally managed lands, have attitudes and beliefs about
rangeland management which greatly contrast those of rural stakeholders, who may depend on
different, more utilitarian uses of the land (Brunson & Steel, 1996). These conflicts can be seen
through the preferences of urban residents for endangered species preservation, rural discontent
with wilderness designations, or rural opposition to reduced grazing permits, and can be seen in
the feedback to different management plans through public comments (Brunson & Steel, 1996;
Vaske, Donnelly, Williams, & Jonkers, 2001).

**Public Lands Initiative**

In the growing dissatisfaction with the management of Utah’s federal lands, both in the
eyes of conservationists and Sagebrush Rebels, Utah Representative Rob Bishop introduced a
proclaimed management compromise of the Utah Public Lands Initiative, or PLI (H.R.5780,
2016). By setting certain lands aside for protection as Wilderness Study Areas in exchange for
the designated development of coal, uranium, and natural gas resources, marginally expanding
the boundaries of Arches National Park and opening areas of the White and Orange Cliffs to
OHV recreation, and impacting the management of various BLM and USFS lands across the
state of Utah, initially, the PLI was met with optimism from both sides in its early drafts.

By 2016, the PLI draft had a clear favor for development, with marginal advances for a
few preserved areas and widespread, permanent reductions in other protections, allowing for
greater development of extractive industries and motorized access. Notably, the PLI prohibited
use of the Antiquities Act within its impacted areas, denying the future chance for presidential
declarations of National Monuments in much of Utah. Within the Public Lands Initiative,
congressman Rob Bishop argued that “Utah's economy, industry, culture, way of life, and its
viability as a state” rested on its ability to develop its natural resources as it saw fit, suggesting
National Monument designation as a threat to the wellbeing of Utah. The PLI was introduced to the 114th Congress but never saw a vote.

Though the PLI suffered a legislative death, its existence signaled the potential political strength of state resistance to environmental and cultural protection and federal management. The PLI’s strength, largely backed the interests of the energy industry, indicates a disparity in land values of the region, and its growth and eventual failure suggest the influence of different interest groups in the management within the Bears Ears landscape.

**Natural Resource Management**

Within the greater Bears Ears landscape, natural resources play a significant part in land management decisions. The United States’ only active uranium mill, Blanding’s White Mesa Mill, sits four miles from the original BENM boundary, and President Trump’s modified Bears Ears boundaries removed protections from the region’s richest uranium stocks (Energy Fuels Inc., 2018; Tabuchi, 2018). Of the region’s 500 uranium mines—both active and abandoned until market forces make mining them profitable—over 300 claims sit within the original Monument’s borders, and roughly one third are owned by the politically-influential Energy Fuels Inc. (Tabuchi, 2018, para. 11). On Cedar Mesa, oil and natural gas deposits exist, and beneath White Canyon, small but significant reserves of tar sands sit beneath layers of Navajo Sandstone (Bears Ears Intertribal Coalition, 2016). At Lockhart Basin and Harts Draw, potash deposits, used as agricultural fertilizer, sit within the initial perimeters of the monument, but the downsizing of BENM could legally allow for potash extraction.

**Parallels in Grand Staircase-Escalante National Monument**

Because of similar natural resource endowments, cultural resources, and a geographic proximity to Bears Ears, the management of Grand Staircase-Escalante National Monument,
particularly its designation through the Antiquities Act of 1906, provides some insight into the attitudes and management of federal land in southern Utah. In the 1996 designation of Grand Staircase-Escalante National Monument, President Clinton extended environmental protections to 1.7 million acres of Southern Utah, largely to defend the region from a significant coal mining operation on the Kaiparowits Plateau (Fried, 1998). The unexpected designation, seen as a “land grab” and a federal overreach, prompted visceral reactions: effigies of President Clinton and then-Secretary of the Interior Babbitt were hanged, the town of Escalante hung flags at half-mast, and animosity and spite linger between federal land management agencies and residents of Southern Utah (Fried, 1998). The tensions created in the designation of GSENM have soured the reception of conservation efforts in San Juan County, and this historical context provides validation for the public responses to 2017’s National Monument Review.

In a study assessing the valuations of GSENKM among different groups, Trainor (2008) interviewed 81 residents of Boulder and Escalante, Utah, regarding the moral values and cultural identities influencing the creation of GSENM. Trainor focuses on and explicitly discusses values and perspectives as divided by different stakeholder groups—the Paiute Indians, descendants of Mormon pioneers, and wilderness advocates—which draw strong parallels to the stakeholder groups influenced by and paramount to the creation and resizing of BENM.

These values and key points are distinct for each group: greater spiritual and identity-forming values connected the Paiutes to the Grand Staircase region; perceptions of religious entitlement and economic dependence tended to influence the negative perceptions of GSENM among descendants of Mormon pioneers; and a moral and cultural value of “wild nature” over economic development unified and motivated wilderness advocates (Trainor, 2008, p. 331-349). Additionally, those ascribing to the Mormon faith see industrious use of the region as
“redemption of both landscape and people,” fulfilling religious mandates of Brigham Young and early Mormon leaders (p.344). Because of the numerous parallels between Bears Ears and Grand Staircase National Monuments, the values and concerns presented in GSENМ prove helpful to understanding the context of the BENM designation.

**Conservation and the Antiquities Act**

As early as 1936, proponents for conservation in the greater Canyonlands area pushed for the creation of a wilderness areas and National Monuments from the San Juan River to the town of Green River, Utah (Larsen, 2015). Through the proposition of America’s Red Rock Wilderness Act, Utah’s Transfer of Public Lands Act, proposed expansions to Canyonlands National Park, and the designation of a Greater Canyonlands National Monument, wilderness advocates responded to the concurrent and opposing Sagebrush Rebellion with ambitious conservation proposals.

The traditional narrative accompanying the conservation and environmentalist movement largely excludes Native American populations in the area, yet the profound influence of Bears Ears Inter-Tribal Coalition member tribes on the designation of BENM shaped the management plans and boundaries of BENM. Former Senator Frank Moss, former Secretary of the Interior Stewart Udall, and red-rock advocates such as Edward Abbey are frequently championed for their Southern Utah conservation efforts, yet the very principles these individuals advocated for have been continuously practiced and proposed by indigenous populations for millennia.

In June of 2010, these efforts culminated in the organized political effort to survey the cultural resources of San Juan County by Navajo Nation representatives (organized by Utah Dineh Bikeyah, representatives of the Navajo Nation for the state of Utah) in preparation for a Bears Ears proposal (Bears Ears Inter-Tribal Coalition, n.d.). This two-and-a-half year, multi-
faceted cultural mapping effort, which involved archaeological cataloging, interviews with tribal elders, and policy research, culminated in the BENM proposal by the Navajo Nation, yet county commissioners and Utah senators and congressmen were unreceptive to the 1.9 million-acre National Monument proposal. In this time, other tribes with interests in preserving the Bears Ears region joined the Bears Ears Inter-Tribal Coalition, bolstering the proposal.

In 2015, the proposal developed by the Bears Ears Inter-Tribal Coalition took flight when it was received by then-President Barack Obama following growing regional and national support. Podcasts, articles, and campaigns were developed to raise awareness of the monument and call upon the Antiquities Act to preserve BENM. On December 28th, 2016, BENM was established by Presidential Proclamation. The designated monument contained much of the proposed protections, but, in concession to critics and advocates for energy development, excluded 600,000 acres of protections from the original proposal, granting 1.3 million acres and an estimated 100,000 archaeological sites federal protection (Obama, 2016). Critical to the proclamation was the inclusion of Native American leaders in monument management, and “one elected officer each from the Hopi Nation, Navajo Nation, Ute Mountain Ute Tribe, Ute Indian Tribe of the Uintah Ouray, and Zuni Tribe, designated by the officers' respective tribes” would be involved in management affairs, establishing an unprecedented model for tribal inclusion (Obama, 2016).
The cultural resources of the region, particularly for the tribes constituting the Bears Ears Inter-Tribal Coalition, were central to the designation of BENM. Unlike the physical resources protected in Natural Bridges National Monument, which the original Bears Ears perimeter encircles, or the contents of Utah’s “big five” national parks, the language of the Presidential Proclamation emphasizes the cultural, historic, and religious significance of the region, as evident in the following passage: “Abundant rock art, ancient cliff dwellings, ceremonial sites, and countless other artifacts provide an extraordinary archaeological and cultural record that is important to us all, but most notably the land is profoundly sacred to many Native American tribes” (Obama, 2016, para. 1). The designation also ensured the continuation of traditional practices of Native American tribes in addition to the continued, but not expanded, grazing, mining, and logging operations within the National Monument.

National Monument Review

In the wake of President Obama’s designation of Bears Ears as a national monument, criticism of federal land management abounded. Local and state representatives unanimously expressed contempt for the monument, claiming the injustice as a federal land grab without
proper consideration of local values. Utah Senator Orin Hatch, then head of the Finance Committee and influential in the success of President Trump’s Tax Cuts and Jobs Act of 2017; Congressman Rob Bishop, author of the Utah Public Lands Initiative; and former Congressman Jason Chaffetz all recommended and pressured the new administration to rescind the onerous designation and reduce the initial Bears Ears Borders.

The widespread criticism of the Antiquities Act’s largest and most contentious designations led to President Trump’s Executive Order 13792, the National Monument Review, on April 26, 2017, which mandated an investigation of 27 National Monuments designated under certain circumstances. The criteria for review are outlined in the following excerpt from Executive Order 13792:

(Executive Order 13792) directs 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.

The National Monument Review required the involvement of the public through the submission of comments containing opinions, preferred policy outcomes, and any original feedback which could aid in the development of policy. From May 11th, 2017, until July 10th, 2017, individuals representing a variety of stakeholder groups submitted comments to the Department of the Interior, ultimately submitting 2.83 million comments.

In addition to the solicitation of public comments through Regulations.gov, the Department of the Interior involved the feedback of Native American populations through the specific feedback from tribes and tribal leaders across the nation. Four listening sessions, sponsored by the Department of the Interior and the Bureau of Indian Affairs, took place from
Oregon to Connecticut, and other tribal representation in the National Monument Review was solicited through written tribal comments. The findings of these sessions, publicly summarized on Regulations.gov,

In a press conference regarding the Monument Review on June 10, 2017—before the conclusion of the public submission request—then-Secretary of the Interior Ryan Zinke concluded that Bears Ears stood in violation with the Antiquities Act of 1906, stating: “There is no doubt that it is drop-dead gorgeous country and that it merits some degree of protection, but designating a monument that… encompasses almost 1.5 million-acres where multiple-use management is hindered or prohibited… is not in accordance with the intention of the Antiquities Act” (Department of the Interior, 2017). The concerns of multiple-use management, which tie into the sentiments of the Wise Use movement, refer to the significance of energy development in the region and concerns of limitations of energy development. Many critics echoed concerns of these economic and industrial constraints—new oil, gas, coal, and uranium mining would be prohibited in the new monument. These criticisms proved essential to the revision of BENM.

**Revision to Bears Ears National Monument**

Following the National Monument Review’s conclusion on July 10, 2017, the future of BENM was dubious—funds had yet to be attributed to the Monument’s management, and rumors of complete evisceration and substantial reductions in size abounded. Then, on December 4, 2017, a highly-publicized visit to Salt Lake City revealed a Presidential Proclamation Modifying the BENM. From the Utah capitol building, President Trump issued an 85% reduction in the size of BENM, dividing the existing 200,000 protected acres into two proposed Monuments—Shash Jaa and Indian Creek National Monuments—with small and remote units of the Monument, including Moon House Ruin (Trump, 2017).
While the status and accompanying protections of BENM were stripped from 1.1 million acres of public land, much of this area is protected by Wilderness Areas and Wilderness Study Areas, which combine to protect a majority of the culturally-rich Cedar Mesa. All of the land formerly protected by Bears Ears is owned by state and federal governments, though some units—including many claimed by Energy Fuels Inc.—have been leased for uranium mining, with increased frequency since the Trump Administration’s reductions (Tabuchi, 2018). These reductions brought credence to the concerns voiced by the Bears Ears Inter-Tribal Coalition regarding development of uranium in the region, as many of the areas which have had protections lifted include those with the greatest uranium development potential. These areas with high likelihood for Uranium development include the Red Rock Plateau, White Canyon, and Abajo Mountain regions, which hold large claims by Energy Fuels and other groups (Elperin, 2017; Bears Ears Intertribal Coalition, 2016).

While uncertainty still lingers regarding the future of the region—Shash Jaa National Monument and Indian Creek National Monument Act (2017) has only been introduced to congress, and management plans for these monuments are still being drafted—the influence of different stakeholders can be seen in the creation, resizing, and management policies surrounding BENM. From the foundation of the Bears Ears Inter-Tribal Coalition to the rejection of the Monument by state and local governments, this history characterizes some of the actors, policy preferences, land values, and points of concern that continue to influence the natural, cultural, and political landscapes of San Juan County.
Review of Supporting Literature

In addition to the natural, social, and political context of Bears Ears National Monument, investigating the processes influencing public policy, the frameworks of land valuations, and ideas of space and place are critical in answering research questions of stakeholder policy preferences, the communication of values and concerns, the roles of different comment platforms, and the incorporation of stakeholder perspectives in land management.

Public Participation Process

Apart from the history of protections, resources, and residents of BENM, the processes which have impacted policy are important to consider. One of these fundamental processes is the request for public comment, a requirement for all NEPA-qualifying actions and policies, and the focus of this thesis. Through Regulations.gov, the public can voice concerns, address overlooked issues, and incorporate their values and preferences into public feedback. New information presented in these comments must be assessed, and, in theory, addressed in the policymaking process, ultimately providing a feedback mechanism between rule makers and their constituents (Bryer, 2013). In the creation of land management policy, Vining and Tyler (1999) suggest the values of the public, representations of the societal construction of place, are the most significant elements that respondents can contribute to policymakers.

The potential for sites such as Regulations.gov to increase the communication and feedback between government and citizens can, in some cases, improve the trust which participants have in governance actions by providing a virtual town hall for public participants and rule makers and by publishing the comments of participants in the rulemaking process (Holzer, Melitskin, Rho, & Schwester, 2004). While the added trust of online rulemaking comment platforms could benefit issues such as BENM, one study concludes that “erulemaking
makes little difference: citizen input remains typically sparse, notwithstanding the relative ease with which individuals can now learn about and comment on regulatory proposals (Coglianese, 2006, p.943).” Coglianese (2006) suggests that the primary restraints for real public engagement in the policymaking process are motivational, and that sites such as Regulations.gov do little to change this. By seeking out comments on a national scale, equally accessible and often equally advertised among the local area impacted and the rest of the United States, Regulations.gov and the National Monument Review may also drown out the voices of stakeholders most directly impacted through a dilution of local input.

Further criticism is often concentrated on the ease of form comments to detract from the digital rulemaking arena. While the public participation process and its relating resources, such as Regulations.gov, are meant to collect novel, useful information from the public that may shed new light on issues examined in the public policy process, interest groups also participate through the influence of form comments. Through copy-and-paste scripts, physical mailers, and auto-submitting forms, groups with business, moral, or a combination of interests in policy make it remarkably easy to submit comments to public agencies. In the comment period for the Department of the Interior’s Monument Review, some of these interest groups included the Audubon Society, the League of Conservation Voters, the Natural Resources Defense Council, the Sierra Club, and the outdoor clothing brand and conservation activist group Patagonia.

The low quality and limited utility of these comments, however, can detract from the intended policy changes advocated for by interest groups—the 76,000th identical comment, for example, fails to introduce any new information to federal agencies (Balla, Beck, Cubbison & Prasad, 2018; Shulman, 2009). According to Regulations.gov, “the comment process is not a vote – one well supported comment is often more influential than a thousand form letters.
In contrast, the public submission process is intended to introduce reasoning, evidence, dissent, and new opinions, perspectives, and expertise to the policymaking process. Despite this intention, “mass comment campaigns typically offer little in the way of insight into policy-relevant dimensions of rules,” and as a result, form comments provide little to the development of regulations such as management plans and monument reviews (Balla et. al., 2018, p. 6).

**Form Comments**

Form comments have an outsized presence in the public comment arena, and the National Monument Review this thesis centers around was no exception. In Balla, Beck, Cubbison and Prasad (2018), the influence of comment campaigns on public policy, especially surrounding complex, value-laden issues, is investigated and analyzed, with the researchers observing a much higher involvement of “broad societal constituencies,” such as environmental groups, than “industries and other specific interests negatively impacted by stringent regulations (p. 22). This bias of mass comment campaigns may devalue the influence of form comments, which dilute arguments and may, in some cases, dissuade the contribution of unique comments.

Beyond the leanings of these form comments, Shulman (2009) concludes that very few public comments would be considered relevant enough for inclusion in policymaking (p.46). Without introducing new information, Shulman states, the encouragement of mass comment organizers is superficial and inconsequential, potentially proving to policymakers, such as the Department of the Interior, that there is little public concern—or at least little original public concern—and as Regulations.gov emphasizes that comment collections aren’t a “vote,” public comment periods only cloud rulemaking (Shulman, 2009, p.47; Regulations.gov, 2018, para. 3). Even worse, Shulman introduces the idea of perverse incentives among mass comment
organizers, with “awareness-building,” visibility,” “increased membership,” “fundraising,” and congressional influence proposed as possible incentives motivating form comment campaigns (2009, p.29).

**Land Valuations**

Critical to this thesis is the concept of land values, the defining perceptions of and relationships to the natural environment by individuals. These land values were exemplified in the Xu and Bengston empirical analysis of different sets of values surrounding National Forests (1997). Forest values, defined by Xu and Bengston, are the “relatively enduring conceptions of the ‘good’ related to forests and forest ecosystems;” as this definition can be duplicated to represent the parallel values expressed for the different landscapes within BENM, the findings of this study are relevant to my thesis.

The four principle values determined in this study were economic-utility, life support, aesthetic, and moral-spiritual, which can be suggested in arguments in favor of and in opposition to conservation policies. Xu and Bengston define Economic/Utility value as “its utility for achieving human ends, where the ultimate end or goal is maximizing preference satisfaction,” “the usefulness of nature as expressed in individual preferences or an aggregation of individual preferences.” Similarly, the value of Life Support is seen as the essential dependence of ecosystems for human survival and is differentiated from economic and utility value by its inability (or extreme difficulty) to be analyzed through willingness to pay valuations, as the values are essential to survival.

In contrast, the Aesthetic and Moral/Spiritual values are categorized as non-instrumental “ends in and of themselves,” as opposed to the aforementioned instrumental values, which are “means to an end.” Aesthetic value is described as the inherent knowledge and perception of
nature, naturally occurring qualities of beauty, grandeur, or other inherent traits of a landscape. Finally, the Moral/Spiritual value can be defined as the value expressed through “love, affection, reverence, and respect,” "the experience of being related to or in touch with an 'other' that transcends one's individual sense of self and gives meaning to one's life at a deeper than intellectual level," and the sense of place that comes from time spent in nature. These values and their definitions informed my coding process, and I utilized the same values in my own content analysis.

In another study, Vaske, Donnelly, Williams and Jonkers found that the demographic characteristics of a respondent have some predictive influence over the values attributed to forests, and by an extension, any natural environment (2001). When comparing different residence times in an area, different genders, and different education levels, Vaske et. al. (2001) recorded a greater propensity for environmental protection and biocentric thinking among young, urban, highly-educated and female respondents. Other findings include the relative stability of land values throughout one’s life, suggesting that land values are learned in early childhood, as individuals begin to define their own identity and relationship to the world; this, coupled with the significantly more biocentric valuation of the land by younger people, suggests that land values have moved away from utilitarian values and towards moral and spiritual values of the land (p. 732).

In Vining and Tyler (1999), the values, emotions, and policy preferences of respondents exhibited towards the management plans and projects for Indiana’s Hoosier National Forest were coded from a public comment period. The values and emotions which this study codified, a result of prior studies and an early screening of values expressed in the responses of public opinion, helped inform and define the selection of values for this study; these values include
“well-being,” “environmental values,” “time” (including heritage and posterity), and “responsibilities,” among others (Vining & Tyler, 1999, p. 24-25).1

In order to better understand the relationship between stakeholders and respondents to the Bears Ears landscape and attempt to answer the second research question of this thesis, frameworks of valuations of the land helped me categorize the information presented by comments submitted to the National Monument Review. Analyses of past valuations, including those conducted by Vining & Tyler (1999), Vaske et. al. (2001), Xu & Benston (1997), and Trainor (2008), provide grounds for comparison between the valuations of BENM and other regional and national valuations.

**Advocacy Coalition Framework**

Some of the ideas explored in this thesis were derived from the Advocacy Coalition Framework, a policy analysis tool used to investigate the strategic interactions of different interest groups or policy actors across different levels of government over time (Sabatier, 1988, p.130). Developed by Sabatier (1988), the role of beliefs—broken up into “core,” “policy core,” and “secondary aspects”—in this framework clarified the complex interplay of beliefs and actors surrounding the continuing land management policy of BENM (p.133). One tool which helped me to identify different groups of actors in the Bears Ears policy events was the idea of “core beliefs,” fundamental, unchanging, underlying beliefs too broad to be represented in individual policy decisions, but influential in informing policy core and secondary aspect beliefs, which were represented by the policy preferences of advocacy coalitions represented in respondents, stakeholder groups, and policymaking officials such as San Juan County Commissioners, Donald Trump, or Navajo Nation leaders (p.133). An example of the application of this concept could be

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1 By coding the emotions represented in the comments, Vining and Tyler extended the information collected, and while their findings led to interesting conclusions and relationships, this was beyond the scope of my thesis.
seen in the region’s Mormon pioneer descendants who hold the “core belief” of religious conviction which, in turn, informs the “policy core belief” of the limited role of government in managing federal lands.

This concept was expanded upon by Feldman (1988), who emphasized the role of core beliefs in guiding individuals towards different policy perspectives on an individual and collective level (p.417). These beliefs, Feldman concludes, form the structures of public opinion, which is then influenced by self-interest, group affiliations, and other factors (p.420). This seminal study emphasizes the causal relationship between core beliefs and perspectives, specifically evaluations and issue preferences, and iterates the complex manifestations of these core beliefs regarding political issues (p.438). These findings influenced my understanding of the role of values versus perspectives (such as the key points found in public responses) on the policy preferences regarding BENM.

**Space and Place**

One idea that influenced the formation of my thesis and the emphasis of different stakeholder groups is the concept of “place” which forms the relationship between individuals and their surrounding environment. According to Cantrill (1998), land management agencies have an obligation to consider the impacts of policy on this sense of place on stakeholders, as “where we live, work, and recreate are socially constructed and endowed with value (p. 303).” While the values endowed upon spaces vary along a “continuum between environmentally-versus socially-salient features,” Cantrill places a responsibility upon policymakers to collect, understand, and implement ideas of place into the policymaking process, a mandate which mirrors the analysis of comments in the 2017 National Monument review (p.312-314).
In Stedman (2003), the concept of place as a social and cultural construction is modified to highlight its status as a product of physical environment, which “sets bounds and gives form to these constructions (p.671).” This distinction is critical in understanding the roles of the physical landscapes protected within BENM to current and historic populations and gives credence to the parallel physical and cultural landscapes, particularly as established by Native American cultures of the Pueblo Era and the present. The importance of the physical environment, Stedman argues, is paramount to establishing behaviors and policies which protect the physical environment from degradation (2003, p.682).

**Content Analysis**

The structure of this thesis was largely informed by the methods, processes, and concepts explored in past papers, dissertations, and studies. One of these studies, an analysis of public comments submitted to the BLM as part of the Western Oregon Plan Revision, implemented a multi-step comment analysis process to familiarize coders with the language used in comments, identify key values expressed, then code comments through the qualitative analysis program NVivo (Muller et. al, 2009). Comments included in this study were then assessed for relationships, redundancies, and thematic trends in a comment database. In this thesis, I chose to investigate similar variables—the values expressed by public comment respondents—under similar circumstances—the management of federal land.

Another study which impacted the methods of my thesis was the 1998 public comment analysis of the Clinton Forest Plan, a contentious land management policy change that garnered a similar clash between values which can be broadly defined as “environmental” and “economic” (Proctor, 1998). Within this study, which closely parallels this thesis in its theme and material, the variables of policy preferred (favoring more versus less environmental protection), values
held by respondents, and proximity to the affected region formed the basis for the comment analysis, which also investigated public comments submitted following a nationally controversial change in land management policy. In the coding process, the “justification emphasis” (the basis of a comment’s policy preference as environmental, social, or economic), “idea of forests” (language used to describe the forest), “role of people in forest management” (who counts most in management decisions and on who should set forest policy), and “ethical basis” (the implied value of nature) all helped inform the variables of my study. I utilized similar methods to determine the relationships between stakeholder preferences, values, and key points.

In Geltman (2016), similar methods of coding and public comment analysis were applied to the tracking of public opinion regarding oil and gas extraction practices. While the variables coded for were different, the method of variable selection, the inclusion of form comments (distinct from “de novo” comments in this study), and the manual coding process and recording methods provided a template for the structure of this thesis. This coding of public comments to determine patterns and themes, and the analysis of these patterns and themes through descriptive statistics and relationships between patterns of public concern and patterns of scientific concern, helped inform me of potential avenues for gaining a better understanding of the National Monument Review comments pertaining to BENM.

Krippendorff’s “Content Analysis” (2013) also helped me to construct my methods in a scientifically justifiable way. By informing me on the methods of sampling techniques, the limits of value inferences, and the potential routes for analysis of my data, the book provided general assistance and underlying ideas which influenced the coding and analysis portions of this thesis.
Methods

Of the 432,206 public responses to the 2017 National Monument Review, I randomly sampled 384 relevant form and non-form comments for analysis and conducted a total population sample of eight comments presented by resident (within 150 miles of the 2016 BENM perimeter) Native American Tribes and organizations. These comments excluded responses with no relation or tangential relation to BENM and those without a stated policy preference—comments coded in this thesis required direct discussion of the management of the Bears Ears Region.

Information on and links to these comments were exported to an excel spreadsheet, and after following these links to comments, I collected basic document information (comment number [out of 384], Regulations.gov document ID number, initial qualifying information [Focus on Bears Ears Policy, Presentation of Policy Preference], date of comment submission, author of comment, and comment type [form, non-form]). These identifying and qualifying qualities enabled me to evaluate, retrieve, recall, and organize comments, and the comment type variable addressed the influence of different comment platforms of research question three.

Based off my research questions, studies on land values and space and place, and the general media coverage of specific points of conflict between advocates and opponents of BENM, I then analyzed comments based on the following variables:

1. Policy Preference (Maintain or Enhanced 2016 Protections/Reduce or Eliminate 2016 Protections): As the primary variable of the National Monument Review, and the focus of research question one, I evaluated the preferred policy of comments.

2. Author’s Stated Residence (Resident of Bears Ears Region/Not Stated or Nonresident): In defining stakeholder proximity to BENM, I chose to code any comments self-identifying
within 150 miles (a distance which excludes the cities of Salt Lake, Saint George, Flagstaff, and Durango) as resident comments. As commenters were not required to list their location, those who did not share their location and those who shared locations beyond 150 miles of the 2016 BENM boundaries were coded as nonresident comments. The information collected from this variable was intended to assist the identification of resident stakeholder groups for research question one.

3. Primary Land Valuation: These values were assigned based off of the land valuation framework presented in Xu & Bengston (1997). The data collected from this variable assisted in answering research question two.
   a. No Specified Land Value
   b. Utility/Economic Values (Instrumental Value)
   c. Life Support Value (Instrumental Value)
   d. Aesthetic Value (Non-Instrumental Value)
   e. Moral/Spiritual Value (Non-Instrumental Value)

4. Consideration of Key Points: These key points were selected from the specific concerns presented in the media and colloquial discussion of the Bears Ears National Monument designation and resizing, and addressed research question two.
   a. Development of Infrastructure (Positive/Negative)
   b. Impacts to Historic or Religious Resources
   c. Impacts to Natural Environment
   d. Impacts to Recreation
   e. Political Aspects (Methods, Motives, and/or Agendas)
Following data collection on these variables, I investigated trends across policy preferences, comment types, land valuations, and key points through descriptive analysis methods. Additionally, I used cross-tabulation strategies to investigate the relationships between different variables and identify stakeholder groups and stakeholder preferences. Statements submitted to the Department of the Interior by tribal representatives were different in format and much longer than many of the public submissions—as such, they have been analyzed through qualitative approaches using quotes and verbal description measures in addition to descriptive analysis methods of trends, averages, and percentages.
Results

After reviewing 781 public submissions and coding 384 public submissions, trends emerged between stakeholder groups, types of comments, values expressed, and key points referenced in public submissions. In selecting 384 relevant comments, 397 comments, or 51% of encountered comments, were found irrelevant to the findings of this thesis due to an insufficient focus on BENM or an unstated preferred policy outcome and were not included in the random sample. Major results, divided by comment type, are presented in Table 1.

Table 1. Values and Key points Represented Across Comment Types (#,%)

<table>
<thead>
<tr>
<th>Value Category</th>
<th>Unique Comments (46)</th>
<th>Form Comments (338)</th>
<th>Tribal Comments (8)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Specified Land Value</td>
<td>7 15%</td>
<td>4 1%</td>
<td>0 0%</td>
</tr>
<tr>
<td>Utility and Economic Values</td>
<td>16 35%</td>
<td>174 51%</td>
<td>0 0%</td>
</tr>
<tr>
<td>Life Support Value</td>
<td>2 4%</td>
<td>0 0%</td>
<td>1 13%</td>
</tr>
<tr>
<td>Aesthetic Value</td>
<td>4 9%</td>
<td>0 0%</td>
<td>0 0%</td>
</tr>
<tr>
<td>Moral or Spiritual Values</td>
<td>17 37%</td>
<td>160 47%</td>
<td>7 88%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Key points</th>
<th>Unique Comments (46)</th>
<th>Form Comments (338)</th>
<th>Tribal Comments (8)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Negative Portrayal of Development</td>
<td>10 22%</td>
<td>15 4%</td>
<td>2 25%</td>
</tr>
<tr>
<td>Positive Portrayal of Development</td>
<td>3 7%</td>
<td>0 0%</td>
<td>0 0%</td>
</tr>
<tr>
<td>Impacts to Religious/Historic Resources</td>
<td>18 39%</td>
<td>282 83%</td>
<td>7 88%</td>
</tr>
<tr>
<td>Impacts to Natural Environment</td>
<td>16 35%</td>
<td>38 11%</td>
<td>1 13%</td>
</tr>
<tr>
<td>Impacts to Recreation</td>
<td>16 35%</td>
<td>166 49%</td>
<td>0 0%</td>
</tr>
<tr>
<td>Discussion of Political Aspects</td>
<td>17 37%</td>
<td>129 38%</td>
<td>7 88%</td>
</tr>
</tbody>
</table>

Stakeholders and Policy Preferences

To answer research question number one—who are the stakeholders involved in the National Monument Review of Bears Ears and what are their policy preferences—I divided the total sample population into the three distinct comment platforms, unique comments, form comments, and tribal comments. Each of these comment types, along with trends in key points, revealed distinct stakeholder groups with affinities for different valuations and key points—these groups can be found in Table 2. Recreational visitors, wilderness advocates, local Native
American tribes, and economic proponents all established a presence in defending the national monument status of Bears Ears. While opponents to BENM weren’t numerous enough to identify any unique stakeholder groups, one respondent was a wilderness advocate.

**Stakeholders**

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Qualities</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recreation Advocate</td>
<td>Key Point: Recreation</td>
<td>182</td>
</tr>
<tr>
<td>Wilderness Advocate</td>
<td>Value: Non-Instrumental; Key Point: Negative Portrayal of Development</td>
<td>16</td>
</tr>
<tr>
<td>Native American</td>
<td>Comment Type: Tribal Response</td>
<td>8</td>
</tr>
<tr>
<td>Representative</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Resident</td>
<td>Residence within 150 Miles of BENM</td>
<td>1</td>
</tr>
</tbody>
</table>

The demarcations between stakeholder groups—respondents which share concerns, values, shared backgrounds (among tribal representatives) or geographic location—present in the National Monument Review varied in clarity and shared perspectives. It is important to note that these identified stakeholder groups are not exclusive—comments indicative of a Wilderness Advocate stakeholder identification may also be Recreation Advocate, for example, and this framework for stakeholder alliance applies to the National Monument Review’s responses, not necessarily those impacted by the protected status of the Bears Ears landscape (more traditional “stakeholders”).

Given the clear distinction in comment structure, the most intuitive stakeholders presented in the National Monument Review were local Native American Representatives: all eight comments presented by tribal representatives advocated for maintained or enhanced protections to Bears Ears National Monuments. Individuals with a recreational interest in Bears Ears, identified by the consideration of the impacts of National Monument Status as a key point

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2 Criteria for wilderness advocate and recreational advocate were derived from the stakeholder groups defined in Trainor (2008)
of response, similarly shared a monolithic view of support for the 2016 BENM boundaries, but the 182 comments shared a more diverse set of values and key points. Wilderness Advocates—individuals who value the Bears Ears landscape for Moral/Spiritual reasons and hold a negative view of development—composed 16 of the 384 comments, including one opponent to BENM.

Policy Preferences

Overwhelmingly, the public submissions sampled supported BENM at a ratio of 128 to 1. While the number of comments advocating for reduced BENM protections—3 comments, or 0.8% of the total comments analyzed—was too small to draw conclusive evidence on the views of individuals in opposition to the Monument, each of these three comments presented different land values and exhibited diverse perspectives. One comment of particular interest aligned with the Wilderness Advocate stakeholder group (held a negative view of development and a moral/spiritual valuation of the region), stating that “preserving these remarkable areas is so important to me” while refuting the claim that Monument designations help preserve cultural or natural landscapes. Other comments were less revealing of motivations or values—one simply states “Please rescind the BENM today. Thank you.”

Representation of Values and Key points

In addition to understanding the relationship between stakeholder groups and policy preferences, it is important for land managers to understand the valuations and arguments (key points) presented in public comments. In response to the second research question of this thesis—what values, concerns, and policy preferences are represented through the public comment medium?—I retrieved data on the values and key points presented generally and through unique, form, and tribal comment platforms.
**Land Values**

Public submissions to the National Monument Review most frequently supported economic and utility values of Bears Ears (49%), followed closely by moral/spiritual values (46%). Aesthetic and life support values were the primary valuation of only four (1%) and two (.5%) comments, respectively. By reclassifying values into instrumental (utility/economic and life-support values) and non-instrumental (moral/spiritual and aesthetic values), 50% of the 384 comments were based on instrumental values, 47% were based on intrinsic values, and the remaining 3% of comments represented no clear value system, typically due to brevity (Xu & Bengston, 1997).

Comments based on economic and utility values generally cited the economic impact of the outdoor recreation industry or the importance of recreational uses, such as climbing, hiking, or camping. Comments based on moral or spiritual values generally referenced the significance of the Bears Ears landscape to the Bears Ears Inter-Tribal Coalition member tribes. One comment presenting moral/spiritual value reads “to spend time in these wild places touches me deeply and helps me be a better human” while another defends the cultural and spiritual value to Native Americans by saying “Bears Ears is significant to all Americans and indispensable to tribal peoples of the Colorado Plateau. This monument must remain a piece of native heritage.” Comments expressing moral or spiritual values included seven of the eight tribal comments, which incorporated elements of intrinsic spiritual value and historical and cultural claims.

The three comment types, indicative of perspectives and opinions, expressed significant differences in the valuations of BENM. A majority (51%) of form comments expressed primarily utility and economic values. In comparison, 35% of unique comments and 0% of tribal comments valued the Bears Ears landscape in utility or economic ways. The plurality (37%) of
unique comments and the majority (88%) of tribal comments express moral/spiritual values. Occurrence of values by comment type can be seen in figure 1.

![Figure 1. Land Values Expressed in Form Comments](image1)

![Figure 1. Land Values Expressed in Unique Comments](image2)

![Figure 1. Land Values Expressed in Tribal Comments](image3)

**Consideration of Key Points**

Similarly, differences in comment types are reflected in the prevalence of key points. Recreational impacts are key points in 0% of tribal comments and 34% of unique comments, while 49% of form comments—largely distributed by outdoor recreation equipment brand Patagonia—discuss the impacts of changed policy on recreation. Political aspects of the Bears Ears management policies, including claims of inadequate review processes, the presentation of
Bears Ears as a “land grab,” the significance of joint management of BENM with the Bears Ears Inter-Tribal Coalition, and the legality of national monument resizing were key points in 37% of unique comments, 38% of form comments, and 88% of tribal comments. Tribal representatives emphasized the legal authority to change Monument Boundaries and the extensive feedback and surveying which contributed to the original boundaries.

Among all comments, the most frequently discussed aspect of the National Monument Review was the impact of policy on historic and religious resources. Rock art, such as that
displayed at Newspaper Rock, Ancestral Puebloan dwellings, such as those found in Grand Gulch, and other culturally and cosmologically significant sites, such as Valley of the Gods, were referenced by some of the 307 (78%) comments defending the cultural resources of Bears Ears, reflecting the purpose of the initial designation.

Insightful relationships also exist between values expressed and the consideration of key points (Table 3). Recreation played a much more significant role to those who value BENM primarily through utility valuations (92%), while commenters who valued the land through moral/spiritual valuations were unlikely to discuss the impacts of BENM on recreation (2%). Historic and religious impacts were frequently discussed by comments exhibiting utility or moral valuations, yet development (particularly regarding fossil fuels) was rarely discussed. Responses indicating a moral or spiritual valuation discussed political methods, motives, and/or agendas 72% of the time, often calling on the legal protections of cultural resources out of moral obligation to Native American residents and the intrinsic value of the land itself. Submissions which presented no specified land value discussed the fewest combined topics, as many of these comments were very brief or vague in their concerns and general in focus.

Table 3. Overlap Between Value Categories and Key Points Considered Within Comments

<table>
<thead>
<tr>
<th></th>
<th>Utility Value (190)</th>
<th>Moral Value (177)</th>
<th>No Specified Land Value (10)</th>
<th>Aesthetic Value (4)</th>
<th>Life Support Value (2)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Historic/Religious Resource Impacts (283)</td>
<td>166 (87%)</td>
<td>118 (67%)</td>
<td>0 (0%)</td>
<td>1 (25%)</td>
<td>0 (0%)</td>
</tr>
<tr>
<td>Recreational Impacts (182)</td>
<td>174 (92%)</td>
<td>4 (2%)</td>
<td>1 (10%)</td>
<td>2 (50%)</td>
<td>1 (50%)</td>
</tr>
<tr>
<td>Political Aspects (146)</td>
<td>10 (5%)</td>
<td>128 (72%)</td>
<td>4 (40%)</td>
<td>2 (50%)</td>
<td>2 (100%)</td>
</tr>
<tr>
<td>Natural Environment Impacts (54)</td>
<td>2 (1%)</td>
<td>48 (27%)</td>
<td>0 (0%)</td>
<td>3 (75%)</td>
<td>1 (50%)</td>
</tr>
<tr>
<td>Negative Portrayal of Development (25)</td>
<td>7 (4%)</td>
<td>16 (9%)</td>
<td>1 (10%)</td>
<td>1 (25%)</td>
<td>0 (0%)</td>
</tr>
<tr>
<td>Positive Portrayal of Development (3)</td>
<td>1 (1%)</td>
<td>0 (0%)</td>
<td>0 (0%)</td>
<td>1 (25%)</td>
<td>1 (50%)</td>
</tr>
</tbody>
</table>
Form, Unique, and Tribal Comments

The third research question—what are the distinct roles of form comments, unique comments, and tribal comments in the communication of values and policy preferences between stakeholders and land managers—was best answered through the comparison of form comments, unique comments, and tribal comments to determine their roles in communicating values, key points, and policy preferences. While differences between t

Of the 392 comments coded, 338 responses were form comments, 46 responses were unique comments, and 8 comments were made by representatives from local Native American tribes and nations (less than 150 miles from BENM). The distribution of these comment types is shown in figure 1, which divides form comments by their source organization or author (Form 1, for example, represents all comments distributed by Patagonia).

Form Comments

Of the 384-comment sample, 338 comments (88%) were form comments, mass-distributed or duplicate submissions following the same eleven templates. Of these eleven templates, the five most prevalent form comments comprised 84% of all comments coded. Some
form comment templates were presented with multiple iterations, with added statistics or varying order of supporting paragraphs; for these, I chose to consolidate similar comments under the same base content, the same values, and the same key points. Table four further explains the five\(^3\) most prevalent form comments.

<table>
<thead>
<tr>
<th>Comment Identifier</th>
<th>Source Organization</th>
<th>Number of Comments</th>
<th>Primary Comment Attributes</th>
</tr>
</thead>
</table>
| Form 1             | Patagonia           | 123                | • Target of recreational visitors with utility valuations  
|                    |                     |                    | • Broad appeal for mass duplication  
|                    |                     |                    | • Direct and brief declaration of support for BENM |
| Form 2             | League of Conservation Voters | 102                | • Target of socially-concerned conservationists  
|                    |                     |                    | • Called for political integrity and enhanced involvement of Native American stakeholders  
|                    |                     |                    | • Emphasis on support for Inter-Tribal Coalition |
| Form 3             | Natural Resource Defense Council | 42                 | • Target of recreational visitors with utility valuations  
|                    |                     |                    | • Statistic-based focus on economic values of outdoor recreation over resource extraction  
|                    |                     |                    | • Connection between monuments and national identity |
| Form 4             | National Audubon Society | 37                 | • Strict target of birders  
|                    |                     |                    | • Preservation of BENM for enhanced bird habitat  
|                    |                     |                    | • Concentrated focus on impacts to the natural environment |
| Form 5             | Sierra Club         | 20                 | • Target of socially-concerned conservationists  
|                    |                     |                    | • Emphasis on political aspects of designation  
|                    |                     |                    | • Attempt to amplify local resident support through national comment campaign |

Trends in form comments include greater references to economic and utility values (51%), a higher representation of recreational concerns (49%), and a lower rate of discussion of the negative impacts of development (4%), though these values are heavily influenced by the frequently-submitted Patagonia and League of Conservation Voters form comments.

\(^{3}\) Comments distributed by these five organizations can be found in Appendix A.
**Unique Comments**

Unique comments encompassed a wide range of lengths and approaches from short statements of Monument support or opposition to lengthy defenses of political processes laden with statistics and legal precedents. Individual respondents supporting and opposing BENM frequently invoked the values and actions of ancestors. One proponent stated: “My husband… grew up on a cattle ranch in southern Arizona. His family is known for restoring the land and habitat of their ranch, and have protected much of it forever with a conservation easement,” while one opponent similarly invoked his great grandfather in the comment “preserving these remarkable areas is so important to me, but so is listening to locals, (sic) great-grandpa was a local, and that Park today is about one-tenth the size of Bear Ears NM.” These claims to ancestry and heritage support the significance of historical legacies of land and freedoms.

In addition to recounting ancestry and illustrating the historical or cultural context of the Bears Ears landscape, unique comments\(^4\) held information on respondent interaction with the landscape or visions of proper management. This personal communication of values and concerns set aside unique comments from more prevalent form comments.

**Tribal Comments**

In contrast to the sample set of 384 Regulations.gov comments, the eight tribal comments shared consistent values and consideration of key points. Moral and spiritual valuations were presented in 88% of tribal comments, and historic/cultural resource impacts and political aspects were key points in 88% of comments. In most cases, much of the comment was dedicated to the importance of indigenous voices in the policy surrounding BENM and the cooperative management of BENM by the tribal representatives outlined in the initial monument designation.

\(^4\) Select unique comments which exemplify respondent interaction with the landscape and visions of management can be found in Appendix A.
Tribal comments frequently referenced the cultural landscape and historical possession of the Bears Ears region by member tribes of the Bears Ears Inter-Tribal Coalition. One comment from the Southern Ute Tribe of southwestern Colorado summarizes the general sentiments of these tribal comments well with the following:

…Because of the three Ute Tribes' historic and current ties to the land, animals, plants, and resources of San Juan County, Utah… (and because) designation as a national monument provides the best formal legal protection to manage these lands and to implement management principles in cooperation with tribes that share ancestral and ongoing ties to the region… (our) support for the BENM designation by President Obama reflects the will and the values of Native peoples whose identities, histories, cultures, and futures are inextricably tied to these lands.

Other comments reflect this language of a critical connection between Native peoples and the landscape, and this core belief repeatedly exhibits itself through the support of policies that further protect the BENM physical and cultural landscape.

One comment submitted by the Navajo Nation emphasizes the importance of Bears Ears and its carefully drawn borders, stating “the area protected by BENM is deeply significant to the Navajo people and other Coalition tribes… (and) the dimensions of BENM were carefully crafted to protect the most important objects.” In response to former-Secretary Zinke’s comments on energy development being the greatest use of certain areas later excluded from BENM, Northern Arizona’s Pueblo of Laguna stated: “We believe BENM has greater value as protected wildlife, cultural, recreational, and historical resources than any temporary economic gain from mineral resource extraction. Rather than sacrificing this incomparable place for the removal of low-quality energy and mineral resources… the national park-quality landscape deserves permanent protection.” The concept of conservation being the best use of the Bears Ears landscape is reflected across all comments, yet tribal support of the national monument designation was the most concise and closely tied to moral and spiritual valuations of the land.
Discussion

Stakeholders and Policy Preferences

Within the National Monument Review, the emergence of distinct stakeholder groups—recreational visitors or potential visitors, wilderness advocates, Native American Representatives, and local residents—supported some of the conclusions of value trends among stakeholder groups found by Trainor (2008). However, the relative insignificance of these groups and the absence of critics, Mormon descendants (a subsection of local residents), and non-representative Native Americans indicates the potential differences between BENM and GSENM, the different scales between this study and Trainor (2008), and the presence of issues in the stakeholder feedback process represented by the National Monument Review.

The stakeholders presented in this thesis are fundamentally separate from those investigated by Trainor, who surveyed local residents and representatives of the GSENM area and thus collected the values of local stakeholder groups (2008). The nationally-targeted National Monument Review, however, investigates the land values, key points, and policy preferences of national respondents, failing to adequately incorporate some of the groups—local residents, including Native Americans and Mormon descendants alike—who are most likely to be impacted by changes to national monument boundaries. Despite the significance of Mormon and Native American heritage in the land management and use in San Juan County, these cultural contexts are underrepresented in responses to the National Monument Review.

In the Department of the Interior Press Release on BENM, former-Secretary Zinke iterated the importance of local feedback and response in the National Monument Review process with the following quote: “Local input is absolutely critical when it comes to federal land management decisions and as such, I’m extending the public comment period for Bears
Ears. I want every advocate to have their voice heard (Department of the Interior, 2017).”

Despite the extended deadline for “local comment,” individuals who identified themselves as locals—defined as residing within 150 miles of the BENM border—composed 0.2% of comments analyzed in this thesis.

Because feedback was requested through Regulations.gov and the designation of BENM was so heavily covered by mainstream media sources nationwide, unimpacted respondents were more likely to respond from around the nation—especially, one might argue, via form comments, which require little motivation and no meaningful understanding of or connection to an issue (Shulman, 2009). The relative removal of respondents from the Bears Ears landscape also helps explain the significant body of comments which fails to align with identified stakeholders—many national respondents, driven to comment by advertisements from Patagonia or other media sources, have limited stakes in the management of Bears Ears, and as such, present arguments which fail to align with expected stakeholder groups. The presence of Patagonia may have also enhanced the unexpectedly high representation of recreational advocates for BENM—recreational visitors are not discussed as legitimate stakeholders by Trainor yet make up 47% of the National Monument Review.

The comments from tribal representatives of the Bears Ears Inter-Tribal Coalition referenced the Review’s lack of meaningful engagement with the indigenous populations on a local and individual level, with the Navajo Nation stating that “(the National Monument Review has) yet to engage the local community in a meaningful manner. We ask that you come meet with us and local tribal members who can offer unique Commission perspectives on what these ancestral lands mean to our Tribe and listen to our views about the origins of this historic monument.” Other comments, including the form comment distributed by the League of
Conservation Voters, reference the communicative shortcomings of the National Monument Review process, especially in incorporating local stakeholders, who were nearly absent in the comments reviewed.

Related to the dominance of local stakeholders by national respondents, especially via form comments, is the lack of representation of monument opponents in the National Monument Review. Composing less than one percent of all comments, opponents to BENM presented varied, potentially diverse values and key points, yet were surprisingly insignificant in number. Unlike the Clinton Forest Plan (Proctor, 1998), the Hoosier National Forest management plan revision (Vining & Tyler, 1999), or the survey of prevailing attitudes and values surrounding GSENM (Trainor, 2008), the National Monument Review showed a complete embrace of BENM despite the vocal and presumably sizeable opposition to BENM. This was one of the most surprising findings of this study, and presents more questions than answers.

Additionally, the lack of form comments from anti-BENM respondents or interest groups is informative in the potentially misleading role of Regulations.gov in policymaking. The observed imbalance in the policy preferences of respondents was not surprising—Balla et. al. found that among comment campaigns with 1,000 or more identical and near-duplicate comments, 13% of form comments are distributed by industries or anti-regulation interest groups—but the complete absence of opponents to BENM in this sample was significant, especially for its relative size, popularity, and vocal base of opponents, including Sagebrush Rebellion sympathizers and many conservative politicians (2018, p.15). While the policy feedback system is not meant to stand as an informal vote, the magnitude of monument defenders and the absence of opposition to the monument shows imbalance within the commenting process.
**Representation of Values and Key Points**

The values presented by form and unique comments in the National Monument Review present unexpected trends. Unique comments analyzed in this thesis presented moral/spiritual values more often than expected—Proctor (1998) recorded zero responses indicating intrinsic value of forests and 406 responses indicating instrumental values, Xu and Bengston (1999) recorded 55% of media indicated economic/utility values while only 5% indicated moral/spiritual values, and Vining and Tyler (1999) recorded 10% of paragraphs coded referencing “human-centered concerns” and only 1% of paragraphs referencing intrinsic value of the land. Conversely, form comments analyzed in this thesis presented more utility/economic valuations than expected and presented these in more evidence-based ways than anticipated—Balla et. al. (2018) suggested a greater frequency of value-laden arguments, typically in defense of moral/spiritual values, instead of the statistic-based comments and utility/economic valuations found in this study’s form comments.

While the instances of moral/spiritual valuations are higher in unique comments analyzed in this study than in those of the Clinton Forest Plan, the Hoosier National Forest, and the study of National Forest values, the legitimacy of this finding may be supported by Vaske et. al. (2001); this study concluded that modern land valuations are moving from utility and economic valuations towards intrinsic or biocentric valuations, and that urban populations are more likely to hold moral/spiritual values of the land than rural populations. As the National Monument Review encouraged electronic responses and national representation, respondents likely represented a much more urban population than traditional local stakeholders in rural San Juan County, resulting in the high representation of moral/spiritual valuations.
Form, Unique, and Tribal Comments

By coding comments from the National Monument Review, I hoped to gain a better understanding of the roles of different comment types—primarily, the difference between form and unique comments—through different representations of values, policy preferences, communication methods, and key points. The significant discrepancies between valuations and key points presented in form comments in unique comments—utility/economic values, for example, are the predominant valuation in 51% of form comments compared to 35% of unique comments, and infrastructure development is discussed in 4% of form comments versus 28% of unique comments—are indicative of different roles between the two primary comment platforms. Either individuals submitting form comments value the land in significantly different ways and consider different key points than individuals submitting unique comments or form comments fail to represent the values and key points of the individuals submitting form comments. This discrepancy enhances the perspective of form comments as a boundary between respondents and meaningful public comment (Shulman, 2009).

The limited number of form comment campaigns (eleven, with the two most prevalent form comments composing 59% of all responses) did little to support the voices of Native Americans or critics of BENM and, when considering the conclusions drawn by Balla et. al. (2018), pervaded the National Monument Review with approximately 2.5 million “spam” comments. As the issues surrounding BENM are dependent on the perspectives of stakeholders—many Mormon pioneer descendants, for example, perceive of the issue as a completely different entity than Navajo Nation representatives—the elimination of unique perspectives and understandings undermines the significance of the public feedback process and inundates Regulations.gov with interrupted participation.
Incorporating Stakeholder Perspectives in Long-Term Management Strategies

In addressing the fourth research question of this thesis—how can a better understanding of stakeholder perspectives inform a long-term strategy for the management of Bears Ears National Monument—it is important to emphasize the communication of content analysis findings, such as those presented in the descriptive analysis of this thesis, between researchers and land management policy makers. Without communication of values, policy preferences, and key points between land management agencies and stakeholders (or simply respondents), the land management feedback process fails to address the needs of the public (Bryer, 2013). However, by critically examining the ways in which different stakeholders are represented and by extending the feedback platform to amplify the perspectives, values, and key points of underrepresented stakeholders, an effective long-term management strategy can be formed.

In order to incorporate stakeholder perspectives in management strategies, researchers and land management agencies must make it a priority to engage with local Native Americans, opponents to BENM, and ancestors of Mormon pioneers in the review process. The shortcomings of the public feedback process are clearly displayed in the lack of representation of opponents to Bears Ears, which compose significantly more than 0.2% of the stakeholders impacted by changes in the management of BENM. While other strategies, such as in-person visits and communication with community representatives such as County Commissioners, often are employed to incorporate local values and perspectives, the imbalance and possibility of misrepresentation of other methods (evident in the criticism of Zinke’s partial visit to local communities by the Navajo Nation) could be made more transparent through open and published communication and greater response campaigns in local and regional areas.
In the wake of the 1996 Grand Staircase-Escalante National Monument designation, which fundamentally damaged trust in the federal government among residents of Southern Utah, significant engagement with opponents to National Monument designations must be made in a way that maximizes transparency prior to the implementation of the Antiquities Act. The call for greater engagement with communities among proponents of Bears Ears and the lack of responses from opponents to Bears Ears in the National Monument Review indicate a failure to properly engage with the values and concerns of different groups. To break the prevailing mistrust between underrepresented groups in the National Monument Review—southern Utah’s Mormon pioneer descendants and Native American residents of the Bears Ears region—and federal land management agencies, open communication, transparency, and concessions must be made. Despite the national ownership of federal lands such as Sash Jaa and Indian Creek National Monuments, a greater consideration of the voices most deeply impacted by policy decisions must be made.

Additionally, long-term management strategies must be built off of representative information presented in review processes, not the low-quality and potentially misleading information presented by form comments (Shulman, 2009). The muting impact of form comments on diverse values and concerns supported in the findings presented in this thesis could be minimized by changes in the way that non-state organizations interact with the public. One model of this public engagement-promoting behavior can be found on the Southern Utah Wilderness Alliance website, which instructs respondents to craft unique comments under guiding ideas. “It’s important that comments be in your own words,” the site states, then suggests different statistics and ideas supporting various backgrounds and perspectives before reminding respondents to “please consider all of these points as you make your comments, and make sure to
add your own! Tell the Department of Interior what makes these monuments so special (SUWA, 2017).” Unlike form comments, which express little more than a vague interest in the policy change at hand, the proliferation of individual comments emphasized by this approach could be used to collect high-quality responses that specifically request personal communication of land values, concerns, and perspectives. These specific, novel, and personal accounts, according to Regulations.gov (n.d.), could help guide open policies through clarified communication strategies.

While more research could be done to gain a more comprehensive understanding of the values, emotions, and policy preferences of different stakeholders, the findings of this thesis offer insight into the construction of long-term management strategies based in stakeholder perspectives and values.

**Further Research**

While the values and concerns of different stakeholders presented in this thesis could provide land managers with resources to better understand national stakeholders, these results do little to provide a complete view of the conflicts and values influencing Bears Ears National Park. Other research opportunities include a similar analysis of values and concerns on a local scale through interviews and survey distribution in San Juan County, Utah—such a study could evaluate some of the absent perspectives in this thesis, and a comparison of the findings on a national and local scale could present interesting patterns and discrepancies which could aid in the management of BENM. Similarly, a lateral study of the changing valuations of the BENM over time, either through similar Regulations.gov comment opportunities or other media sources, such as the San Juan Tribune, could provide valuable insight into the changing values and
concerns of Southern Utahns; implications of these findings could contribute to up-to-date management practices and greater adherence to constituent values and concerns.

Finally, similar case studies to the analysis of BENM could be duplicated and mapped across different types of land, including areas where the physical landscape plays a greater role than the cultural landscape. Other studies could be compiled into geographic valuation maps over time and be applied to greater land management and planning techniques.
Conclusion

As management decisions have real implications on land use, accessibility, and cultural and natural resources, it is imperative that land management decisions, such as the creation and subsequent resizing of BENM, are made with consideration of historical, political, and cultural context and current perspectives of local and national stakeholders. By understanding the land values and key points underlying the policy preferences of different stakeholder groups, land managers will be better equipped to resolve conflicts in contested landscapes such as Bears Ears.

From the moral and spiritual values presented by Native American representatives to the ideologies of Western LDS pioneers, the identities of stakeholders shape the land use and management policies of Bears Ears. To meet the instrumental and non-instrumental needs of current stakeholders, perspectives, concerns, and values must be communicated and implemented in the land management policymaking process.
Bibliography


Utah Public Lands Initiative Act, H.R.5780, 114th Congress (2016).


Appendix A: Sample Comments

These comments composed a majority of the public submissions on the National Monument Review. While the form of some of the following comments varied—particularly those following the outline of comment 5—these comments illustrate trends in form and content repeated frequently in form comments and public submissions in general.

Form Comments

Comment 1: Patagonia

Please don't rescind or alter BENM. This culturally rich and recreationally spectacular place is part of our national legacy and the legacy of future generations. It's one of the important wild places where we go to run, hike, camp, ski, fish, climb and spend time with our friends and families. These public lands are not just beautiful but economically beneficial to our local communities and our nation as a whole.

Comment 2: League of Conservation Voters

I am appalled that our treasured National monuments are up for review at all. Every single one of our parks, monuments and cultural or historic sites is worthwhile and belongs as a part of the American story. I am adamantly opposed to any effort to eliminate or diminish protections for national monuments and I urge you to support our public lands and waters and recommend that our current national monuments remain protected. The short review you are undertaking makes a mockery of the decades of work that local communities have invested to protect these places for future generations, especially BENM, which is the first on the list for this review. Five Tribal nations, Hopi, Navajo, Uintah and Ouray Ute Indian Tribe, Ute Mountain Ute and Zuni tribes came together, for the first time ever, to protect their shared sacred land by advocating for Bears Ears to be made a national monument. Now the Bears Ears Inter-Tribal Coalition is working to protect the national monument, and maintain its integrity. Hear me, and the overwhelming number of people who agree with me: PUBLIC LANDS BELONG IN PUBLIC HANDS. It is your job as the Secretary of the Dept. of Interior to protect and safeguard our national treasures. Please make sure you side with the people who support national parks, monuments, historical and cultural sites.
Comment 3: Natural Resource Defense Council

I am appalled that our treasured national parks and monuments, like the BENM, are up for review at all. Bears Ears is one of our nation's newest monuments -- the American people are very lucky to now call this ancient site covering an expanse of 1.3 million acres a public resource protected for future generations. The monument protects ancient sites that are sacred to the Native American tribes in southern Utah's red-rock country. Utah is greatly enriched by the BENM. BENM also provides incredible spaces for outdoor activities-- it is one of best places in the world for rock climbing and bouldering. These public lands need to stay in public hands. No president has EVER attempted to abolish a national monument, and an attack on one park is an attack on all our parks. Secretary Zinke, I am adamantly opposed to any effort to eliminate or diminish protections for Bears Ears or any other national monument, and I urge you to support our public lands and waters and recommend that our current national monuments remain protected.

Comment 4: National Audubon Society

Dear Secretary Ryan Zinke,

As a supporter of bird conservation and our public lands, I strongly urge you to protect all national monuments under review, and to reject any changes to these iconic landscapes.

The national monuments created in the past twenty years have protected vital bird habitat, helped safeguard our heritage, and benefited communities across the country. Reversing any of these designations would be a tragic mistake with harmful consequences for all that depend on our magnificent public lands.

From the buttes of Bears Ears that support birds like the Golden Eagle, to the underwater canyons of the Northeast Canyons and Seamounts National Monument that support a critical ecosystem for Atlantic Puffins, to the rocky peaks of the Organ Mountains-Desert Peaks National Monument, the shrub-steppe habitat of Hanford Reach National Monument in
Washington, and out to the pristine Pacific waters of the Papahanaumokuakea National Monument, all of these lands and waters are indispensable to birds and other wildlife.

These monuments are a legacy of Teddy Roosevelt. He and all fifteen subsequent presidents--of both parties--have recognized the need and value of protecting these public lands with the Antiquities Act. I urge you to uphold Roosevelt's legacy and maintain these monuments for current and future generations.

Sincerely,
(Name)

**Comment 5: Sierra Club**

Our national monuments and public lands and waters help define who we are as a nation by telling the story of our historical, cultural, and natural heritage. I am extremely disappointed that President Trump has signed an executive order that attempts to undermine our national monuments. Attempts to roll back protections for national monuments would be both illegal and terribly misguided. I strongly urge you to oppose any efforts to eliminate or shrink our national monuments.

I am vocally opposed to and disappointed in Secretary Zinke's interim recommendation to reduce the boundaries of BENM. I truly hope that the Secretary will reconsider and instead act to keep all of our national monuments protected as they are.

Grand Canyon-Parashant, Ironwood Forest, Vermilion Cliffs and Sonoran Desert national monuments in Arizona are truly some of the treasures of our state. The unique geology and undisturbed starry skies of Grand Canyon-Parashant, the incredible scenery of Vermilion Cliffs, the unique ecosystem and species of the Ironwood Forest and the saguaro cactus forests of the Sonoran Desert National Monument are all unrivaled and deserve the highest protections. Not only are these monuments incredibly worthy, they bring enormous benefits to our state by providing opportunities for recreation and driving the outdoor recreation economy.
Additionally, an attempt to attack one monument by rolling back protections-like the drastic recommendation for BENM-would be an attack on them all. Sending a signal that protections for our shared history, culture, and natural treasures are not permanent would set a terrible precedent. This would discourage business investment and community growth around all national monuments while also sending the signal that our history and natural wonders are negotiable. National monuments have already been shown to be tremendous drivers of the $887 billion outdoor recreation economy and businesses in gateway communities rely on the permanency of these protections when making decisions about investing in these communities. Whether at Grand Canyon-Parashant or Vermilion Cliffs in Arizona, or other monuments across the country, our national monuments should remain protected for future generations to enjoy - they are a gift that belongs to all Americans.

I am firmly opposed to any effort to revoke or diminish protections for national monuments and I urge you to support our public lands and waters and recommend that our current national monuments remain protected.

Unique Comments

*Comment DOI-2017-0002-27449*

As an outdoor enthusiast who loves our public lands, I support the designation of BENM and ask that it's boundaries remain unchanged.

Almost 20 years ago I visited this area of the country for my first time. I was in impressionable teenager from Cleveland, Ohio fortunate enough to be introduced to this amazing environment. It's sheer wonder gave me a little slice of perspective on what was out there in the world and what was important to protect.

For more than 100 years, Presidents of both parties have used the Antiquities Act-a tool signed into law by Theodore Roosevelt-to enact far-sighted protections for our common American inheritance. Bears Ears is exactly the kind of place the Antiquities Act intended to protect. It is
rich in cultural history which inspired a historic coalition of tribes to band together to push for its
designation. In addition to protecting over 100,000 archaeological sites, the designation
preserves world-class recreation opportunities in places like Cedar Mesa, Grand Gulch, and
Indian Creek.

The process that led to the designation of BENM was thorough and transparent. For more than
80 years, decision makers from all sides presented proposals seeking permanent protection of all
or part of this incredible landscape. The boundaries were informed by both the multi-year Public
Lands Initiative and by a proposal from the Bears Ears Inter-Tribal Coalition. Those boundaries
do not exceed the acreage necessary to preserve the rich cultural heritage, ecological values, and
recreation assets.

Now almost 20 years later in my life I am fortunate enough to live beside this beautiful part of
the country and work for a manufacturer in the outdoor industry. The outdoor community brings
in over $800 billion in consumer spending, provides millions of jobs and is a thriving industry
and conversation in America. On top of this it gives us a reason to believe and love this beautiful
planet that provides and nourishes for us every minute of every day.

Thank you for reviewing the decades of hard work and thoughtful consideration that culminated
in the designation of BENM. Please demand that President Trump leave the current BENM
boundaries in place.

Excerpt from Comment DOI-2017-0002-334680

Dear Secretary Ryan Zinke,

My addition to the message below is please please protect these monuments. Southern Utah is
the place of my heart, a place I go to renew myself, experience stunning and heartstopping
beauty, challenge myself physically and spiritually. Bears Ears and the Grand Staircase include
sacred spaces and archeological wonders. Preserving them does not hurt ranchers, and not
preserving them will hurt untold numbers of animals, plants, on and on. We humans need wild
spaces, even if we don't go there. We need them to balance what we call progress. We cannot
have life without them. I don't have the right words to express how I feel about this, but I grieve to think Grand Staircase and Bears Ears are in danger of losing protection. Please continue to protect them.

Comment DOI-2017-0002-45743

To whom it may concern,

I strongly urge all powers involved to uphold the designation and current size of Bears Ears and Grand Staircase Escalante National Monuments in Utah. As a resident of Jensen, Utah, I have seen and continue to witness the economic stability that Dinosaur National Monument has offered through tourism to the communities that surround it that would otherwise be almost completely reliant upon the fickle nature of global energy markets. While some Utah legislators argue that National Monument designations detract from local economic viability and jobs, further investigation shows that many of these concerns are based on potential but not realized revenues, which are less certain and have less longevity than the promotion of places that attract visitors from around the world.

Additionally, the cultural artifacts, landscapes, and ecosystems found within Bears Ears and Grand Staircase Escalante National Monuments deserve the utmost level of respect, preservation, and valuation when one considers how unique these monuments are in a global context. Americans deserve places such as this which allow them to see this country as it has always been and should always be. Please consider the scale of any decision to compromise the integrity of what many to believe our nation's greatest treasures and promote these monuments instead of rescinding or reducing them.

Comment DOI-2017-0002-52219

Please do listen to the majority of the locals and those they elected to represent them. Those sacred sites and special cultural resources were safer a year ago when they received less media, marketing, and visitorship. Certainly we can expect greater vandalism, litter, and desecration with high visitorship. All over Utah this problem exists and with a backlog of $12billion in
maintenance the Parks Service cannot afford to protect what is "protected" now. Certainly, a stronger RMP would be just as effective as a special designation. As a citizen of Utah and environmental specialist who has worked in San Juan County with people on both sides of the aisle I wholeheartedly oppose the designation.

My great-grandfather was an engineer who lived close to Zion Canyon 100+ years ago. He surveyed Zion Canyon, then called Mukuntuweap, and recommended it to the federal government to become a national monument in 1909. In 1919, it was declared as a national park, and its boundary has grown some since then. Preserving these remarkable areas is so important to me, but so is listening to locals, great-grandpa was a local, and that Park today is about one-tenth the size of Bear Ears NM.

We want to take care of these special resources at the right scale, and for the right reasons. Please consider that the locals in San Juan County lack the financial resources that large environmental NGOs and companies like Patagonia have. Patagonia made $10 million dollars in profits on Black Friday last year, San Juan County's general fund is only $12 million dollars. Who will be heard? The locals who care about stewardship? Or the corporations trying to enhance their brand? Please consider undesignating the monument, please consider more economical and fiscally sustainable management practices.

Comment DOI-2017-0002-50699

Our national monuments and public lands and waters help define who we are as a nation by telling the story of our historical, cultural, and natural heritage. I am extremely disappointed that President Trump has signed an executive order that attempts to undermine our national monuments. Attempts to rollback protections for national monuments would be both illegal and terribly misguided and I strongly urge you to oppose any efforts to eliminate or shrink our national monuments.

National monuments help protect God's creation and tell the stories of God's people. National monuments help faithfully tell the stories of all of us. From the Native American story at Bears
Ears to the framework story at Cesar Chavez to the African American story at Pullman. Our national monuments tell our stories and are places where we pray and play.

BENM in Utah, which is first on the list for this review, is a textbook example of the priceless historic, cultural and natural wonders that are protected as National Monuments. Protecting 100,000 archaeological and cultural sites the monument honors the voices of five tribes who joined together to seek protection of their shared ancestral lands and traditions, BENM should remain protected permanently.

An attempt to attack one monument by rolling back protections would be an attack on them all. Our shared history, culture, and natural treasures should be protected not dismantled. Monuments across the country should remain protected for future generations to enjoy - they are a gift that belongs to all Americans.

I am firmly opposed to any effort to revoke or diminish protections for National Monuments and I urge you to support our public lands and waters and recommend that our current national monuments remain protected.
Appendix B: Sample of Codebook Spreadsheet

Figure 5. An example of the organization and criteria used in the coding of public submissions.