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THE SUQUAMISH TRIBE

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Submitted via Regulations.gov

July 10, 2017

The Honorable Ryan Zinke
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

RE: Executive Order 13792, Review of Certain National Monuments

Dear Secretary Zinke:

The Suquamish Tribe appreciates the opportunity to provide comments concerning National Monuments, in response to your Department's review of such designations pursuant to Executive Order 13792 and Federal Register Number 2017-09490. The Suquamish Tribe is a signatory to the 1855 Treaty of Point Elliott and is a federally recognized Indian Tribe located in Washington State. Since time immemorial, the Suquamish people have inhabited the abundant inland waters of Puget Sound and the Salish Sea. Suquamish means "people of the clear salt water" in traditional Lushootseed language. In 1854, Chief Seattle of the Suquamish Tribe reminded present and future generations of Americans that "[e]very part of this country is sacred to my people."

Since Congress enacted the Antiquities Act in 1906, sixteen Presidents spanning the political spectrum have proclaimed 157 National Monuments across the United States. Our nation's Monuments celebrate and protect America's diverse, collective history. Monuments preserve the natural capital of this continent, which sustained indigenous peoples such as the Suquamish for thousands of years. National Monuments also serve as economic drivers and points of pride for local communities. In a rapidly changing world, National Monuments and the Antiquities Act are a first line of defense, ensuring there will always be places where all Americans can seek solace and connect with our past.

The arguments for reviewing and potentially reducing the size of our national monuments are short-sighted. The need for short-term gains in energy extraction and expansion of destructive recreational activities pale in the value that these monuments will have over many generations who can continue to have unique cultural and spiritual experiences with these unique ancient American landscapes. Local communities continue to work together to balance the need for jobs with the preservation of our irreplaceable cultural heritage and spiritual places. Cultural tourism is a growing renewable industry. National monuments are key to the tourism industry's sustainability.

The Suquamish Tribe is concerned about the disturbing trend that this Administration is taking that has the overall intent to diminish the preservation of the places that makes our traditional homeland sacred and nurturing including our beaches, lakes, streams, mountains, and deserts given to us by our Creator to preserve, sustain, and enjoy. Tribes have a uniquely profound stake in the future of America's National Monuments because Monuments often encompass important indigenous cultural sites and resources. Here in Washington State, for example, the San Juan Islands National Monument, designated in 2013, includes part of the Suquamish Tribe's usual and accustomed treaty fishing grounds. Hanford Reach National Monument, one of the Monuments expressly named for review, covers ancestral territory of the Yakama, Nez Perce, Umatilla, and Colville Tribes. From Devils Tower National Monument, designated in 1906, to Canyons of the Ancients National Monument, designated in 2000, National Monument status has frequently been invoked to preserve places of tremendous spiritual and cultural value to Native American peoples.

Regional Tribes have expressed unanimous and unequivocal support for protection of Bears Ears as a National Monument, and Tribes from coast to coast stand with them. The current stance of the executive branch questioning the validity of the Bears Ears National Monument, among other designations, runs counter to the federal government's firm fiduciary obligation as trustee of tribal interests. As Secretary of the Interior, you have an obligation as a federal trustee to uphold this fiduciary duty, and protect tribal interests. Your June 10 interim report to the President, however, recommending that "the existing boundary of the BENM [Bears Ears National Monument] be modified" stands in stark opposition to the express wishes of the tribal governments affected by the designation. As one of the 567 sovereign tribal nations to whom you owe this obligation, the Suquamish Tribe calls on you to heed your solemn fiduciary duty and stand with Tribes in protecting America's National Monuments, including BENM.

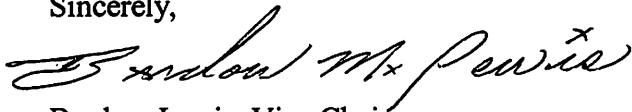
Furthermore, the Antiquities Act withholds authority from a President to change, downsize or abolish a national monument designation or weaken the protections afforded by a national monument proclamation declared by a predecessor. Congress purposefully reserved this power. Although under the Antiquities Act, Congress delegated authority to the President to act to create a national monument, only Congress can modify or revoke that action. The enactment of the Federal Land Policy and Management Act in 1976 reaffirms Congress's express intention to purposefully reserve for itself the power to revoke or modify national monument proclamations.

As Chief Seattle cautioned half a century before the Antiquities Act was passed into law, "In all the earth there is no place dedicated to solitude. At night when the streets of your cities and villages are silent and you think them deserted, they will throng with the returning hosts that once filled them and still love this beautiful land."

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The Suquamish Tribe urges you to fully protect and preserve the integrity of our country's current and future National Monuments that are proclaimed under the Antiquities Act, to comply with the Antiquities Act, and to respect that modification or revoking of a National Monument can only be accomplished by an act of Congress.

Sincerely,

A handwritten signature in cursive script that reads "Bardow M. Lewis". The signature is written in black ink and is positioned above the typed name.

Bardow Lewis, Vice Chairman
Suquamish Tribe