

From: Damm, Laura
To: [Bowman, Randal](#)
Subject: Re: GSENM & BENM Comments
Date: Friday, September 29, 2017 2:31:52 PM

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Hi Randy, Yes, I left you a VM last evening. Thanks for passing along this information. I will look over it and talk with Josh. I'll be in touch on Monday if I have any follow up questions.

Have a good weekend.

Laura

On Fri, Sep 29, 2017 at 3:12 PM, Bowman, Randal <randal_bowman@ios.doi.gov> wrote:

I believe you called me this morning, but I could not make out your last name on the message, and made a mistake in writing down your phone number. When I did not get an email as the person who left the message said they would send, I checked with Aaron and he advised that you were working on Cascade-Siskiyou, so I am presuming the call was from you.

Below is the information I provided Josh on why we did not count comments by individual monuments; it is applicable to all of them.

I am taking the rest of the afternoon off, but if this does not answer your question or if you have others, feel free to get back to me on Monday.

----- Forwarded message -----

From: **Bowman, Randal** <randal_bowman@ios.doi.gov>
Date: Fri, Sep 22, 2017 at 8:24 AM
Subject: Re: GSENM & BENM Comments
To: "Hanson, Joshua" <joshua.hanson@sol.doi.gov>

We made a deliberate choice not to count by monument, as a high percentage of comments covered more than one - often just by listing them, but still more than one. This would then have resulted in a monument-by-monument count for even a few monuments being higher than the reported total number of comments, likely resulting in more controversy, and so we decided not to go there. Trying to do such a count would also be complicated by the attachment issue.

We initially thought we had slightly over 76,000 comments for Bears Ears at the end of the first comment period. The report I provided to the Secretary's office also noted that there were some issues with post cards being attached to comments on [regs.gov](#) that were not readable, and that we were trying to resolve that. This note did not make it into the report. We subsequently discovered, well after the interim report was submitted and the comment period on Bears Ears reopened, that various groups were attaching post cards, form letters,

petitions and apparently even mailing lists as attachments to comments. From the first 100,000 [regs.gov](https://www.regulations.gov) comments, there were 610,000 letters, post cards or names on these attachments. The attachments were almost all pdfs, so we could not do any search or sorting of their contents. Each one has to be opened to see what it is. All were organized by groups opposed to the review.

To get an accurate count for the initial Bears Ears comment period, we would have to go back and check the submittal dates for each of that first set of [regs.gov](https://www.regulations.gov) comments with attachments, then open each one received before the close of the initial comment period to see if they mentioned Bears Ears or not, and then add those that did to the 76,000.

Additionally, at least one group bundled thousands of member letters - which were not identical - into their pdf attachments, so someone would have had to read through each of those thousands of letters to count which ones mentioned which monuments. That would be a very time-consuming process, which would have required many more reviewers than we had, and the Secretary's office did not ask us to do that. With the reopening of the comment period, the initial count for Bears Ears became almost meaningless in any case.

On Fri, Sep 22, 2017 at 6:51 AM, Hanson, Joshua <joshua.hanson@sol.doi.gov> wrote:
Hey Randy,

How many comments did we get regarding Grand Staircase Escalante National Monument? Also, were you guys ever able to land on a final number for Bears Ears?

Thanks,

Josh

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Joshua F. Hanson
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