



July 17, 2017

Re: Support for California's National Monuments

Dear Mono County Board of Supervisors,

Below is a summary of Friends of the Inyo's comments to Secretary Zinke on the seven National Monuments under review in California. Each monument is properly protected under the Antiquities Act for diverse reasons, and each holds its own unique objects of historical, cultural and scientific value. A complete narrative regarding each monument may be viewed on our website at: <http://friendsoftheinyo.org/foiD7/nationalconservationlands>.

Friends of the Inyo is a grassroots nonprofit conservation organization dedicated to the stewardship, exploration and preservation of the Eastern Sierra's public lands and wildlife. Over our 30-year history, Friends of the Inyo has become an active partner with federal land management agencies including the Bureau of Land Management, National Park Service and the Forest Service. Leveraging these partnerships, and drawing on our own resources, we work on many designated lands, including National Monuments, that draw vast numbers of visitors. Every year these lands become more popular, the number of visitors keeps increasing. We write today to convey our support for California's National Monuments. We also provide specific substantive information regarding each monuments' unique objects of historical, cultural and scientific interest, economic benefits and record of public support in our comment letters.

Recent research on the impact of public lands is documenting the value of protected places, including national monuments. A new analysis by the Center for American Progress and Conservation Science Partners compared individual monuments to other lands across the west and found that each monument holds very high percentiles (80-90's) for indexes such as bird diversity, rare species richness, reptile diversity, and dark sky darkness.<sup>1</sup>

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Dickson, B.G., M.L. McClure, and C.M. Albano. 2017. A landscape-level assessment of ecological values for 22 national monuments. A report submitted to the Center for American Progress. Conservation Science Partners. Truckee, California.

We support retention of the current size of each California monument. As stated in each's proclamation, each fills the requirement of being the smallest area necessary to protect the complexity of the area's objects of interest. In many cases, the size of a given monument is critical for keeping the dwindling populations of flora and fauna conserved, cultural resources protected and recreational resources maintained. Furthermore, in many cases, retaining the monuments' current size is critical to protect against the risk of resource extraction including mining and large scale solar development.

We support the protection of these monuments through presidential proclamation. California's monuments were designated following adequate public process. Nearly every monument received visits from the then Secretary of the Interior and subsequent public hearings were held, with widespread local and regional support.

Allowable uses under California's monument proclamations ensure the public can enjoy and visit each monument in a variety of recreational ways and the land management agencies can appropriately manage the area while at the same time protecting the objects of interest found there. Grazing permits are still issued by BLM within monument boundaries. Mineral and mining leases are grandfathered in. Hunting is allowed and roads remain open to the public. In places like Giant Sequoia, fire management is a focal point, and monument status helps fund fire use and fuels reduction programs.

National monuments have already been shown to be tremendous drivers of California's economy. This is extremely important in California where recreation represents about \$85 billion of the state's economy. Travel and tourism are also important to the communities surrounding these national monuments. In 2015, tourism represented 19% of private wage and salary employment, or about 53,000 jobs. The nation has an \$887 billion outdoor recreation economy and businesses in gateway communities rely on the permanency of national monuments and other federal land protections when making decisions about investing in these communities.

A recent Headwaters Economics study (2017) examined gateway communities of several Monuments' under review and found they experienced strong growth after designation. Factors analyzed included population, employment, real per capita income and real personal income. Service and non-service jobs grew or stayed constant in almost every case.<sup>2</sup> Economic growth in rural communities surrounding national monuments is a common occurrence and is now well documented through scientific studies.

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<sup>2</sup> <https://headwaterseconomics.org/public-lands/protected-lands/national-monuments/#factsheets>

Statewide, senators Feinstein and Harris sent a letter of support for California's monuments under review. In addition, the California State Assembly and Senate passed a joint resolution on June 13, 2017 supporting all monument designations in California. California Attorney General Xavier Becerra also sent a letter to Zinke's office supporting the designation of California's monuments. In his letter he also defended the authority of the President to designate monuments through the Antiquities Act, and identified the lack of authority, under law, of a subsequent President to change this designation.

In conclusion, we strongly oppose any efforts to revoke or diminish protections for our state's monuments, or to decrease their size. We ask Zinke to consider the use of the Antiquities Act as it was intended and that presidential proclamation of national monuments is a legitimate and legal use of this act. Sixteen presidents from both parties have used the Antiquities Act and none have ever tried to revoke one. Legal scholars agree that a president can designate a national monument but only Congress can rescind or reduce a previous designation.

We encourage the Mono County Board of Supervisors to pass a resolution supporting national monuments in our county and across the state, in solidarity with other counties and our state and federal elected officials.

Sincerely,

Jora Fogg  
Preservation Manager