



July 7, 2017

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

Re: Comments on Carrizo Plain National Monument

Dear Secretary Zinke,

Friends of the Inyo is a locally-based nonprofit conservation organization based in Bishop, CA 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 (BLM), National Park Service and the Forest Service. Through these partnerships we have worked on many designated lands that draw vast amount of visitors and are seeing increased use, including National Monuments. We write today to convey our (and our 700+members) support for Carrizo Plain National Monument and offer concrete examples of Carrizo's unique objects of historical, cultural and scientific interest, its economic benefits and the record of public support.

The 204,107 acre Carrizo Plain National Monument preserves the last tract of native grasslands that once stretched for four hundred miles through central California. The nearby grasslands of the San Joaquin Valley and other valleys in the vicinity have been eliminated by extensive land conversion to agricultural, industrial, and urban land uses. As the largest undeveloped remnant of this ecosystem the monument provides crucial habitat for the long-term conservation of the many endemic plant and animal species that still inhabit the area. Species of particular scientific interest include the endangered San Joaquin kit fox, the California condor, the blunt-nosed leopard lizard, the giant kangaroo rat, the San Joaquin antelope squirrel, the longhorn fairy shrimp, and the vernal pool fairy shrimp. The grasslands also support populations of pronghorn antelope and tule elk. Rare and sensitive plant species, include the California jewelflower, the Hoover's woollystar, the San-Joaquin woolly-threads, the pale-yellow layia, the forked fiddleneck, the Carrizo peppergrass, the Lost Hills saltbush, the Temblor buckwheat, the recurved larkspur, and the Munz's tidy-tips. Shrinking the size of the monument would imperil many of these species and it is for this reason the 204,107 acres designated is the smallest

area compatible with the proper care and management of the monument's objects of interest.

Geologically, The area is known for its unique geography that can be attributed to the San Joaquin Valley faults. The barrenness of the Carrizo plain has allowed scientists to trace the San Andreas fault for over 800 miles which is the longest fault in California and one of the longest in North America. to be kept in tact. The monument allows for geological, paleoseismic, and geophysical research to take place.

Culturally, the monument is rich with fossils remains that give us clues into the N. American provincial mammalian age. Important prehistoric history include dozen of sites with pictographs, village maddens, and bedrock mortar milling locations. Chumash, Yokuts, Salinan and other tribes occupied this area for thousands of years. The Chumash people were primarily responsible for the pictographs on the popular tourist destination of Painted Rock and this area holds remains a sacred place for the tribe. Notably, Painted Rock has been subject to vandalism over the last 100 years and since designation has been curbed by monument management. If Carrizo Plain's acreage is reduced we are at risk of further damaging these historical resources and erasing American history. In recent history, the monument has past evidence of dryland farming and ranching that are a perfect example of old American way of life.

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 Carrizo Plain to other lands across the west and found it to be in the in the 95th percentile for bird diversity, the 95th for rare species richness, the 82th percentile for reptile diversity and the 77th percentile for dark sky darkness.¹

We support the 2001 designation for the protection of the above described unique objects of historical, cultural and scientific interest within the monument boundaries. As stated in the proclamation, this is the smallest area necessary to protect the complexity of the Carrizo Plain's objects of interest. The size of the monument is critical for keeping the dwindling populations of flora/fauna conserved. Furthermore, oil mining in the surrounding area poses further threats to ground-dwelling animals like the endangered San Joaquin kit fox.

The allowable uses under the proclamation ensure the public can enjoy and visit the Monument in a variety of recreational ways and the BLM can appropriately manage the area while at the same time protect the objects of interest found there. Grazing permits are still issued by BLM within the monument boundaries. Mineral and

¹ 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.

mining leases are grandfathered in. Any additional mining would destroy the preserved grasslands and hillsides and further endanger imperiled species living within the monument. Recently, Topaz Solar Farms and California Valley Solar Ranch have started construction of two solar panels north of the monument. While these solar panels have negative environmental impacts on the Carrizo Plains, both companies have acquired 30,000 acres of land to alleviate the impacts of the project. By 2047, the plants will be decommissioned and removed in order for that land to be restored to a natural state.

National monuments have already been shown to be tremendous drivers California's economy where recreation represents about \$85 billion of the state's economy. Travel and tourism are also important to the communities of the Carrizo Plain region. 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. Speaking on the National Monument and other nearby protected public lands David Garth, president/CEO of the San Luis Obispo Chamber of Commerce (from 1973-2011) notes that "...businesses are attracted to this area because of the highly desirable labor pool that chooses to settle in this beautiful natural setting and experience the county's great quality of life."

A recent Headwaters Economics study (2017) found that San Luis Obispo and Kern County's gateway communities to the Monument experienced strong growth after the designation of the monument. From 2001 to 2015 there was a 25% growth in population, a 28% increase in employment, a 23% increase in real per capita income and a 55% increase in real personal income. Economic growth in rural communities surrounding national monuments is a common occurrence and is now well documented through scientific studies. Services jobs, such as doctors, engineers, and teachers, Services grew from 255,713 to 349,760 jobs, a 37% increase and Non-service jobs, including those related to agriculture grew from 113,608 to 139,355 jobs, a 23% increase.²

In addition to Secretary Babbitt's visit to Carrizo and subsequent public hearing held at the Carrizo Plain visitor center (which the entire student body of Carrizo Plain School attended), there was widespread local and regional support for Carrizo's designation.

Statewide, senators Feinstein and Harris sent a letter of support for Carrizo Plain National Monument and five others in California that are under the Executive Order review. In addition, the California State Assembly and Senate passed a joint resolution on June 13, 2017 supporting all monument designations in California and

² <https://headwaterseconomics.org/wp-content/uploads/Carrizo.pdf>

specifically naming Carrizo Plain National Monument. California Attorney General Xavier Becerra also sent a letter to your office supporting the designation of Carrizo and the other five other monuments under review in California. 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 Carrizo Plain National Monument. In making your recommendation regarding this national monument please also take into consideration 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.

Sincerely,

Jora Fogg
Preservation Manager