



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 Giant Sequoia 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, 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 support for Giant Sequoia National Monument and offer concrete examples of why Giant Sequoia should remain under its current management, including the monument's unique objects of historical, cultural and scientific interest, its economic benefits and the record of public support.

We support the 2000 designation for the protection of the unique objects of historical, cultural and scientific interest within the monument's 328,315 acres. This is the smallest area necessary to protect the Giant Sequoia trees and other objects of interest described below. The allowable uses under the proclamation ensure the public can enjoy and visit the Monument in a variety of recreational ways and the Forest Service can appropriately manage the area while at the same time protecting these objects of interest.

Giant Sequoia trees, the world's largest living tree, are the focal point of the monument. Living to over 3,000 years old, these trees exist only in a narrow 60-mile band along the Sierra Nevada. The Monument contains 33 groves, nearly the entire species' population outside of national parks. Supported by this ecosystem and the abundant creeks, rivers and meadows intermixed, are many rare species such as Pacific fisher, great gray owl, American marten, northern goshawk, peregrine falcon, California spotted owl and California condor.

Geologically, the monument contains a series of limestone caverns and “holds unique paleontological resources documenting tens of thousands of years of ecosystem change. The monument also has many archaeological sites recording Native American occupation and adaptations to this complex landscape, and historic remnants of early Euroamerican settlement as well as the commercial exploitation of the giant sequoias. The monument provides exemplary opportunities for biologists, geologists, paleontologists, archaeologists, and historians to study these objects” (April 15, 2000 presidential proclamation).

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. A recent Headwaters Economics study (2017) found that Fresno and Tulare County’s gateway communities to the Monument experienced strong growth after the designation of the monument. From 2001 to 2015 there was a 21% growth in population, a 20% increase in employment, a 24% increase in real per capita income and a 50% 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, account for the majority of employment growth in the Giant Sequoia region in recent decades. Non-service jobs, including those related to agriculture and forestry remain stable.

The local economy is driven by a thriving recreation industry of campers, hikers, bikers, and people using the rivers of the monument to fish, swim and boat. The monument is the closest access for 18 million residents of the greater Los Angeles area to experience the forests of old growth sequoia trees. The monument also provides important recreational, cultural and economic resources to the Tule River Tribe, whose reservation is adjacent to the monument. A living history is detailed in the monument where there are Native American cultural sites from the past 8,000 years, evidenced through lithic scatters, food-processing sites, rock shelters, village sites, and rock art.

The rivers of the Kings, Kaweah, and Kern, and the thousands of miles of streams that feed them, flow through the monument and provide clean drinking water as well as recreational activities such as fishing and boating. The forests within and buffering the monument keeps clean water flowing downstream to hundreds of small family farms and large agricultural enterprises in the Central Valley. California’s Central Valley produces 8% of all food grown in the United States and contributes substantially to agricultural exports. The water that comes from the forests of the national monument is a major factor to the success of California’s food growers and the nation’s economy as a whole.

The 2012 Giant Sequoia National Monument Plan was carefully crafted to allow for a full range of fuels treatment work necessary to protect and allow for Sequoia groves to flourish. The boundaries of the Monument were created to allow for fire to be

managed over a landscape level area, with an integrated approach to ensure that fire occurs at the appropriate periods and intensities to benefit giant sequoias and their surrounding ecosystems. In order for ecologically sound fuels treatment projects and fire use to be carried out the Monument needs more funding. However, without monument status, current as well as any future funding will likely go away, jeopardizing the very resources and objects the designation sought to protect. It will also set back years of restoration and fuels reduction work already done in the monument. We urge the executive branch to consider increased funding for Giant Sequoia National Monument so that the management underway can continue.

The decision to designate Giant Sequoia was done through widespread public engagement and garnered support from local communities, business owners, and visitors as well as elected officials and community organizations. The monument today has the same level of support, if not more, given the recent attention drawn to it.

Locally, the Porterville City Council voted on June 22 to send your office a letter in support of the Monument. This was largely due to local public speakers emphasizing the value of the Monument designation to their livelihoods, businesses and quality of life. In Kernville, the Kern County Board of Supervisors pulled a resolution to reduce the size of Giant Sequoia, after hundreds of calls and emails flooded their offices.

Statewide, Senators Feinstein and Harris sent a letter of support for the designation of the Giant Sequoia 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 specifically naming the Giant Sequoia National Monument. California Attorney General Xavier Becerra also sent a letter to your office supporting the designation of the Giant Sequoia Monument and the other five 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 Giant Sequoia 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