



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 Mojave Trails 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. In 2015 we supported the Monument proposal for Mojave Trails and work today to help ensure its proper implementation after the designation. We write today to convey our ongoing support for Mojave Trails National Monument and offer concrete examples of Mojave Trails' unique objects of historical, cultural and scientific interest, its economic benefits and the record of public support.

The 1.6 million acre Mojave Trails National Monument preserves the core of the Mojave Desert and its major landscape linkages, connecting 15 wilderness areas, Joshua Tree and Death Valley National Park's and Mojave National Preserve. Part of the monument's large size is due to these existing designations. Preserving landscape linkages is critically important for maintaining the health and sustainability of regional biodiversity and critical habitat areas. Ecological linkages provide pathways for wildlife to forage and for wildlife and vegetation to migrate and adapt to climate change. It is due to these factors, as well as others below, that the 1.6 million acres designated is the smallest area compatible with the proper care and management of the monument's objects of historical, cultural and scientific interest.

The monument includes the largest ever private land donation to the federal government, allowing it to be accessible and enjoyed by all. Its objects of historical cultural and scientific interest include significant biological diversity, a large

number of threatened and endangered species, recent discoveries of species new to science, unique geological resources and abundant historical and archeological resources. The monument also contains some of the best example of intact wilderness, scenery, and recreational opportunities in the west.

Biologically, approximately 2,450 native plant species have been documented in the California desert, representing 38% of the state's entire native flora. A total of 530 species (21%) are listed by the California Native Plant Society as rare and of conservation concern. The monument offers a scientific opportunity for discovery because the California desert remains largely unexplored botanically and species new to science can be discovered and described. Similar to desert plants, many desert wildlife species are found only in the Mojave Desert. The Monument is home to the federally threatened desert tortoise, southwest willow flycatcher, Bell's vireo, desert bighorn sheep, golden eagle, and many other wildlife species. Afton Canyon contains a perennial river where the Mojave River flows beneath the surface creating oases and lush marshlands that are home to several endemic species of plants and animals found.

Geologically, this unique landscape contains a stunning diversity of lava flows, mountains, playas, sand dunes, bajadas, washes, and other features. The area has been a focus of geological research for decades. The monument contains a number of significant sand dune features, most notably the stunning Cadiz Dunes, which have been extensively studied. The mountains of the Mojave Trails area include several significant formations, and seismologists have studied this area for insight into faulting, tectonics, and magmatism. A number of young volcanoes, including Amboy Crater, designated as a National Natural Landmark in 1973, have been heavily studied by volcanologists. There are also the 550 million-year-old trilobite fossil beds of the Marble Mountains and many other unique geologic formations.

Culturally, the monument would preserve the most pristine, undeveloped remaining stretch of historic Route 66, known as the Mother Road, which is arguably the most famous highway in America. Created in 1926 as part of the nation's first system of federal highways, Route 66 became popular as the shortest, best-weather route across the country. Linking Chicago to Santa Monica, it helped transform America into the automobile-oriented society it is today. Through literature (John Steinbeck, *Travels with Charley*), film, television and song, it became an international icon. In 2008, the World Monuments Fund designated Route 66, along with such world heritage sites as Machu Picchu and Shanghai, as a threatened resource on their Watch List of 100 Most Endangered Sites. The March 2009 Smithsonian Magazine recognizes Route 66 as one of "15 Must-See Endangered Cultural Treasures." More generally, the monument preserves the rich and storied history of the American railroad, homesteading, General Patton's World War II desert training sites, and westward migration. Prehistorically, irreplaceable archeological and cultural sites abound with rock art, home sites, and sacred Native American trails and trade routes.

A new analysis by the Center for American Progress and Conservation Science Partners compared Mojave Trails to other lands across the west and found it to be in the 97<sup>th</sup> percentile for uninterrupted landscapes, 94<sup>th</sup> for night sky darkness, 93<sup>rd</sup> in wild and remoteness, 86<sup>th</sup> in reptile diversity and 64<sup>th</sup> in soil diversity.<sup>1</sup>

We support the Feb 12, 2016 designation for the protection of the above described unique objects of historical, cultural and scientific interest within the monument's 1.6 million acres. This is the smallest area necessary to protect the complexity of the Mojave Desert's objects of interest outlined in the proclamation. The allowable uses under the proclamation ensure the public can enjoy and visit the Monument in a variety of recreational ways and the Bureau of Land Management can appropriately manage the area while at the same time protect the objects of interest found there.

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. The local economy surrounding Mojave Trails National Monument is driven by a thriving recreation industry of outdoor tourism. Hiking, camping, horseback riding, off-highway recreation and wildflower/wildlife viewing are all popular activities. The over 200 businesses that benefit financially from the outdoor industry and protected federal lands are testament to the economic benefit monument status provides.

The decision to designate Mojave Trails was done only after Congress failed again and again to act on the American public's support of the Monument through introduced legislation. It was then that Secretary Jewell worked diligently to understand the public sentiment around the designation and in turn found widespread public support from local communities, business owners, and visitors as well as elected officials and NGOs. Public records and support books show over 175 businesses, 26 elected officials and local governments, three tribes and tribal organizations, 15 leaders of faith, dozens of veterans and active service members and dozens of scientists from a variety of disciplines wrote letters or signed petitions in support of the Mojave Trails National Monument. Jewell assessed all of this data and held a public hearing in Riverside County that was attended by over 1,000 people, the majority in support of the designation. This public meeting was the culmination of dozens of other town halls and public hearings over the previous nine years. In short the Obama administration did their due diligence to make sure this monument had community buy in and local support.

---

<sup>1</sup> 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.

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