



July 9, 2017

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

Re: Comments on Sand to Snow 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 (and our 700+members) support for Sand to Snow National Monument and offer concrete examples of Sand to Snow's unique objects of historical, cultural and scientific interest, its economic benefits and the record of public support.

Sand to Snow National Monument preserves a rich tapestry of landscapes and habitats such as high alpine slopes, low altitude woodlands, rivers, wetlands, and rugged desert vistas. Within its boundaries are the headwaters of the Whitewater River and Santa Ana River, the longest river in Southern California. Checkered throughout the monument are numerous lush oases and springs, which are home to migrating birds, mule deer, desert bighorn sheep, mountain lions, and black bears. The monument rises from the Colorado Desert at 1,600 feet above sea level to southern California's tallest alpine peak, Mount San Gorgonio at 11,503 feet. Because of its location, the Monument is home to starkly different habitats converging, including Mediterranean chaparral, subalpine conifer forests, and various scrub and woodland habitats of the Mojave and Colorado deserts. These diverse habitats support a rich array of plant and animal species. Signature plants of the California's deserts, such as California barrel cacti, Joshua Trees, and Ocotillos are found in the monument. This stunning geographical and biological diversity also provides for a wide array of recreational uses, such as camping, geocaching, hiking, hunting, horseback riding, photography, skiing, and wildlife viewing.

Geologically, Sand to Snow is a landscape of dramatic topography created approximately 175 million years ago when oceanic plates subducted under the North American plate, a common occurrence in California. Less common was the creation of the transverse (east-west trending) mountains of Southern California, due to the San Andreas Fault's abrupt change from a northerly to a westerly direction just north of Los Angeles. This includes the San Bernardino Mountains that form the western half of the Monument. The transverse ranges stand in stark relief to the more common south-north trending mountains of the peninsular and interior desert ranges. And all these ranges converge on Sand to Snow. The result is a land of spectacular scenery, where the mountains rise suddenly from the flat, desert floor, and branches of the San Andreas Fault form broad canyons carved into the mountains.

Culturally, Black Lava Butte and Flat Top Mesa contain rich Native American cultural relics with important ancient village sites. The lands within the monument were a critical transition zone for tribes' seasonal migration in and out of the San Bernardino Mountains. The Monument contains important cultural sites that represent the rich history of California. More recent cultural sites exist too, including Spanish, Mexican, and American conquest and settlement. Numerous ranches from all three periods still dot the landscape, and the area's rich mining history can be observed throughout the area.

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 Sand to Snow to other lands across the west and found it to be in the 98<sup>th</sup> percentile for rare species richness, the 92<sup>nd</sup> for reptile diversity, the 87<sup>th</sup> percentile for geophysical type rarity, the 77<sup>th</sup> percentile for mammal diversity and the 77<sup>th</sup> percentile for climate resilience.<sup>1</sup>

We support the 2016 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, 154,000 acres is the smallest area necessary to protect the complexity of the objects of interest within the monument's boundaries. The size of the monument is critical for keeping the dwindling populations of flora/fauna conserved. 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 and Forest Service 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

---

<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.

rely on the permanency of these protections when making decisions about investing in these communities. The local economy surrounding Sand to Snow National Monument is driven by a thriving recreation industry of outdoor tourism. Hiking, backpacking, hunting, 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 Sand to Snow 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 Sand to Snow 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.

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