

*Northeast Section  
The Wildlife Society*

The Honorable Ryan Zinke  
U.S. Department of the Interior  
Attn: Monument Review, MS-1530  
1849 C Street NW  
Washington, D.C. 20240

August 22, 2017

Dear Secretary Zinke:

The Wildlife Society is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. Our mission is to enhance the ability of wildlife professionals and wildlife students to conserve biodiversity, sustain wildlife populations, and ensure responsible use of wildlife resources and habitats. The Northeast Section of The Wildlife Society is comprised of 7 State Chapters and 19 Student Chapters, representing nearly 1,000 wildlife managers, biologists, ecologists, botanists, hydrologists, geologists, and students from Maine to West Virginia – all devoted to the sustainable conservation of wildlife and wildlife habitat in the northeastern United States.

The Northeast Section of The Wildlife Society is pleased to submit the following comments relating to the U.S. Department of the Interior's (DOI) consideration of abolishing or reducing the size of 27 National Monuments and Marine National Monuments designated or expanded since 1996 under the Antiquities Act of 1906. This review is in response to two 2017 Executive Orders (i.e., 13792 and 13795). As part of the decision-making process, DOI is specifically requesting comments related to whether the designated land includes "historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest." As we understand, DOI is considering whether these National Monuments should be scaled back, stating that the Antiquities Act should be used to protect the "smallest area" needed to cover important sites.

We acknowledge that the comment period for Bears Ears National Monument has already closed, leaving 26 National Monuments and Marine National Monuments under review. The Northeast Section of The Wildlife Society believes all 26 National Monuments should be retained in their current size and with current protections.

Within the geographic boundary of the Northeast Section of The Wildlife Society, one National Monument and one Marine National Monument are under review by DOI, and we offer the following comments specific to these units.

- **Katahdin Woods and Waters National Monument** in Maine spans 87,563 acres of prestigious mountains and wilderness in the North Woods. This National Monument provides recreational opportunities including hunting and fishing. In addition, this National Monument provides high quality habitat for moose, bald eagle, snowshoe hare, black bear, fisher, numerous migratory breeding birds, and Canada lynx (*Lynx canadensis*), and numerous migratory breeding birds. Canada lynx is listed as a threatened species under the U.S. Endangered Species Act (ESA). The southern extent of its natural range extends into northern Maine and the southern extent of its mapped Critical Habitat is located within this monument. This relationship provides immense opportunity to study and protect this threatened species in an area where it is most at risk. The area also provides breeding habitat for up to 90 forest bird species that return each year to raise their young in the Maine Woods, many of whom have experienced dramatic population declines over the past 40 years. Over the long term, this area offers an unusual opportunity to provide high quality structurally complex breeding habitat and support the “baby bird factory” of the north that is so critical to the future of these songbirds, especially as it is adjacent to the 200,000+ acre “wilderness” Baxter State Park on the west side and by heavily managed industrial forests with little mature forest present on the east side. Both Atlantic salmon (*Salmo salar*) and brook trout (*Salvelinus fontinalis*) are found here, and Maine is the last stronghold for both these species. Atlantic salmon are a federally listed endangered species and a section of its northern designated critical habitat is contained within a portion of this monument. Wassataquoik Stream, for example, contains high value salmon habitat and is annually stocked with salmon fry as part of ongoing federal and state salmon recovery efforts. The NPS could be an important partner in salmon recovery work. The area is one of the largest ecologically intact landscapes in the North Woods, providing habitat connectivity and important migration corridors for a wide variety of wildlife species.
- **Northeast Canyons and Seamounts National Monument** is located off the coast of New England on the edge of Georges Bank. This Marine National Monument comprises 4,913 square miles of marine habitat including the protection of several underwater seamounts and three submarine canyons. The Marine National Monument provides habitat for deep sea corals as well as important habitat for a variety of marine fisheries including lobster and red crab. The Marine National Monument continues to provide important recreational fishing opportunities.

These National Monuments and Marine National Monuments protect important areas of biodiversity. The boundaries of these National Monuments and Marine National Monuments are confined to “the smallest area compatible with the proper care and management of the objects to be protected” and this includes the plant and wildlife species that inhabit these areas.

In addition, these National Monuments and Marine National Monuments are appropriately classified under the Antiquities Act as “historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest,” because of the scientific interest in protecting, studying, and researching the unique ecosystems, rare, threatened, and endangered species, and ecological processes. Many long term studies have been initiated on these lands and waters, particularly with respect to natural movements of species as a result of climate change. Continued data collection is critical to the scientific integrity of these studies, which have the potential to inform management at all levels of government and on private lands. Removing these lands from designation as National Monuments has the potential to compromise these scientific investigations.

Many of these National Monuments and Marine National Monuments are comprised of federal lands that already had some level of protection as designated wilderness or National Wildlife Refuge; therefore, we argue that there would be no effects of this designation on “the available uses of designated Federal lands, including consideration of the multiple-use policy of section 102(a)(7) of the Federal Land Policy and Management Act (43 U.S.C. 1701(a)(7)).” In all cases, the National Monuments and Marine National Monuments remain open to public access for wildlife viewing and appropriate recreational activities. The designation of these areas as National Monuments and Marine National Monuments should not affect the “available uses of Federal lands beyond the monument boundaries” or “the use and enjoyment of non-Federal lands within or beyond monument boundaries.” Further, we argue that because these sites were already under Federal land management jurisdiction, there remains “availability of Federal resources to properly manage designated areas.”

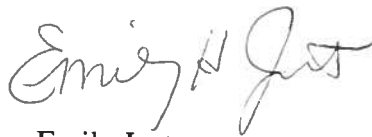
Many studies demonstrate overwhelming evidence that public lands boost local economies, create jobs, and provide recreational opportunities. Therefore, we argue that the “concerns of State, tribal, and local governments affected by a designation, including the economic development and fiscal condition of affected States, tribes, and localities” were effectively evaluated during designation and that the communities surrounding these National Monuments are receiving economic benefit as a result of designation.

In conclusion, the Northeast Section of The Wildlife Society, believes these National Monuments, as they currently exist, afford protection to unique ecosystems, including a myriad of plant and wildlife species, mitigate untold symptoms of population growth and climate change, and provide refuge to numerous rare, threatened, and endangered species. We strongly believe that these National Monuments, in their current size and configuration, are critical components for preservation of wildlife and their habitats for generations to come. The continued protection of these National Monuments in

perpetuity and free from any commercial extraction, will help to retain these unique ecosystems.

Thank you for the opportunity to provide these comments regarding DOI's consideration of abolishing or reducing the size of 27 National Monuments and Marine National Monuments. Should you have any questions or require additional information from the Northeast Section of The Wildlife Society, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Emily H. Just". The signature is written in dark ink and is positioned above the printed name.

Emily Just  
President

The Northeast Section of the Wildlife Society