

July 10, 2017

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

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 productivity, and ensure responsible use of wildlife resources and habitats. The Western Section of The Wildlife Society is comprised of 8 local Chapters, representing nearly 1,000 wildlife managers, biologists, ecologists, botanists, hydrologists, geologists, and students from California, Nevada, Hawaii, and Guam – all devoted to the sustainable conservation of wildlife and wildlife habitat in the western United States.

The Western Section's Conservation Affairs Committee (CAC), with the support of its member Chapters, is submitting comments on 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: 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 already concluded, leaving 26 National Monuments and Marine National Monuments under review. Eight of the National Monuments and 4 of the Marine National Monuments are located within the geographic boundary of the Western Section of The Wildlife Society. The Western Section of The Wildlife Society, including all members within its 8 Chapters, believe that these National Monuments should be retained in their current size and protection, for the reasons outlined below.

We request that the acreages reported for the five Marine National Monuments (Notice for Review DOI-2017-0002-0001) be reviewed, as we believe that some of them may be significantly incorrect based on information from other published documents.

- **Basin and Range National Monument** in Nevada spans the transition between the Mojave Desert and the sagebrush steppe of the Great Basin region. The area is one of the largest ecologically intact landscapes in the Great Basin region, providing habitat connectivity and important migration corridors for a wide variety of animal species. The vast, rugged landscape enables researchers to conduct studies over a broad scale of unique habitats – including sagebrush flats, native grasslands, desert scrub, pinyon pine, and ponderosa pine. This National

Monument is home to the endemic White River catseye as well as 2,000-year-old Bristlecone pines, and the area provides important habitat for desert bighorn sheep, mule deer, Rocky Mountain elk, and pronghorn.

- **Berryessa Snow Mountain National Monument** in northern California is widely recognized for its diversity of habitat types that support a variety of plant and wildlife species, including the American bald eagle and the California Chinook salmon. This Monument boasts chaparral ecosystems and rolling oak woodlands at lower elevations, transitioning to mixed conifers, and at higher elevations, thick stands of true fir, weather-shaped Jeffrey pine, and incense cedar surround natural fields of exposed rock formations. These ecosystems provide high quality habitat for a variety of threatened and endangered species, including northern spotted owls, marten, and fisher; serve as essential waterways for California Coastal chinook salmon and Northern California steelhead; and support habitat for black bears, river otters, coyotes, deer, tule elk, mountain lions, and songbirds.
- **Carrizo Plain National Monument** in Central California provides protected habitat for many animals and plants that are endemic to the San Joaquin Valley and found nowhere else in the world, contains hundreds of significant cultural sites ranging from prehistoric to those of recent history, has unique geologic features such as the San Andreas Fault and Soda Lake, and its brilliant annual wildflower displays draws visitors from all over California and the world. The Carrizo Plain National Monument was established to protect these resources and the boundaries of the Monument were established with this goal in mind. The Carrizo Plain, and its protection, is a critical component for the recovery of species, such as the San Joaquin kit fox, blunt-nosed leopard lizard, giant kangaroo rat, San Joaquin antelope squirrel, San Joaquin woolly threads, and California jewel flower. Reductions in the boundary could put the recovery of these species in jeopardy.
- **Giant Sequoia National Monument** in Central California is home to approximately two-thirds of all the giant sequoia trees still standing in the world, including the Stagg tree, regarded as one of the largest trees in the world. The Giant Sequoia National Monument not only provides habitat for wildlife, but provides an opportunity for people from all over the world to see these National treasures. This Monument is critical for Central California's economy as it is a major tourist destination. It is important to protect the home of these majestic trees that are literally older than America.
- **Gold Butte National Monument** in Nevada contains an extraordinary variety of diverse and irreplaceable scientific, historic, and prehistoric resources, including vital plant and wildlife habitat. It has been designated as critical habitat for the Mojave Desert tortoise, which is listed as threatened under the Endangered Species Act. The relict leopard frog, once considered extinct and now a candidate species for listing under the Endangered Species Act, has been released into spring sites in the area in a collaborative effort by local, State, and Federal entities to help revive this still very small population. The Gold Butte area serves as an effective corridor between Lake Mead and the Virgin Mountains for large mammals, including desert bighorn sheep and mountain lions. The banded Gila monster, the only venomous lizard in the United States, has also been recorded in Gold Butte. Migratory birds, including bald and golden eagles,

use the diversity of habitats in the area to meet many of their seasonal, migratory, or year-round life cycle needs.

- **Marianas Trench Marine National Monument**, located adjacent to the Commonwealth of the Northern Mariana Islands and Guam, protects submerged lands and waters in various places in the Mariana Archipelago. This area includes unique reef habitats that support marine biological communities dependent on basalt rock foundations, unlike those throughout the remainder of the Pacific. These reefs and waters are among the most biologically diverse in the Western Pacific and include the greatest diversity of seamount and hydrothermal vent life yet discovered and one of the most diverse collections of stony corals in the Western Pacific, including more than 300 species, higher than any other U.S. reef area. Sirena Deep, about 6.6 miles beneath the surface, is the deepest point of the Mariana Trench Marine National Monument and contains virtually unexplored underwater terrain.
- **Mojave Trails National Monument** is a mosaic of rugged mountain ranges, ancient lava flows, and spectacular sand dunes. Several rare plant species have been identified as well as other plant species that are new to science, many of which have not yet been described. This National Monument is home to the northernmost occurrences of smoke trees in the California desert and the densest concentration of Bigelow cholla cactus in California. Bird species, including the endangered Least Bell's vireo, southwestern willow flycatcher, and yellow-billed cuckoo, depend on this area. Fragile desert fish species, such as the bonytail chub, rely on the scarce waters of the desert riparian ecosystems. The area contains some of the Mojave Desert's best habitat for the threatened desert tortoise and provides important dispersal corridors for that fragile species as well as many others.
- **Pacific Remote Islands Marine National Monument** consists of seven islands and atolls, widely flung across the Pacific, that are farther from human population centers than any other U.S. area. It is a safe haven for millions of birds and marine life that swarm to shallow areas and islands to rest, feed, mate, and give life to their offspring. Threatened green turtles and the second largest red-footed booby colony in the world are found in this Marine National Monument. This area represents one of the last frontiers and havens for wildlife in the world, and comprises the most widespread collection of coral reef, seabird, and shorebird-protected areas on the planet.
- **Papahānaumokuākea Marine National Monument** is a shark-dominated ecosystem with 4,000 year-old coral and countless undiscovered species. This area includes extensive coral reefs that are considered the rainforests of the sea, as they are home to over 7,000 marine species, one-quarter of which are found only in the Hawaiian Archipelago. Many of the islands and shallow water environments are important habitats for rare species, such as the threatened green turtle and the endangered Hawaiian monk seal, as well as the 14 million seabirds representing 22 species that breed and nest there. Land areas also provide a home for four species of bird found nowhere else in the world, including the world's most endangered duck, the Laysan duck. This Marine National Monument was named United States' first mixed (natural and cultural) World Heritage Site in 2010, only one of 28 such sites in the entire world
- **Rose Atoll Marine National Monument** consists of emergent and submerged lands and waters of and around Rose Atoll in American Samoa. Rose Atoll is the most important seabird colony in

the region, since approximately 97 percent of the seabird population of American Samoa resides on Rose, and provides important nesting and roosting habitat for 12 species of federally protected migratory seabirds. Coral communities at Rose Atoll include approximately 140 species that are distinctive and unique from those of the other islands in Samoa. To date, about 270 species of fish have been recorded.

- **Sand to Snow National Monument** stretches from the floor of the Sonoran Desert and ascends rapidly to the towering 11,500-foot peak of San Geronio Mountain. This National Monument is an incredibly diverse area with a wide range of ecosystems ranging from lowland Mojave and Colorado deserts, riparian forests, creosote bush scrub, woodlands, fresh water marshes, Mediterranean chaparral and alpine conifer forests. Hundreds of springs rise to the surface at South Fork Meadows, the origin of the South Fork of the Santa Ana River. This area contains large un-fragmented habitat areas with no roads, and serves as an important habitat linkage area between the San Bernardino and San Jacinto mountain ranges. The area has a remarkable species richness that makes it one of the most biodiverse areas in southern California. Twenty-six federally listed threatened and endangered animal species live in this dramatic landscape. It is recognized as among the most important avian habitats in the State, and its oases are frequented by over 240 species of birds.
- **San Gabriel Mountains National Monument**, known as the “crown” on the Valley of Angels, is made up of rugged peaks and canyons of chaparral, and is within a 90-minute drive for over 15 million people in the Los Angeles Basin. The rivers of the San Gabriel Mountains not only provide drinking water but are vital in the support of native fish, animals, and plants, and provide critical habitat for threatened or endangered species, such as the California condor, mountain yellow-legged frog, arroyo chub fish, and Nelson’s bighorn sheep. This National Monument provides public access to thousands of miles of streams, hiking trails and other outdoor recreation opportunities.

These National Monuments and Marine National Monuments protect important areas of biodiversity. As a collection of professional wildlife biologists and land managers, we argue that the boundaries of the National Monuments and Marine National Monuments, which we have summarized above, are confined to “the smallest area compatible with the proper care and management of the objects to be protected,” which includes the plant and wildlife species that inhabit these areas. Many wildlife species require adequate acreage of land to accommodate species home ranges, and as is the case for Berryessa Snow Mountain, San Gabriel Mountains, and Sand to Snow National Monuments, the surroundings areas have been extensively developed, making these monuments all the more important for long-term conservation efforts.

Similarly, as a collection of professional wildlife biologists and land managers, we argue that 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 scientist 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, particularly in 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 the 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 opportunities¹. 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, we, as the Western Section of The Wildlife Society, believe 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.

The CAC and the Western Section Member Chapters believe the role of science in policy and decision-making is to inform the decision process, rather than to prescribe a particular outcome. Policy and decision-makers may make determinations that do not always provide maximum benefits or minimize impacts to wildlife and habitats. Such determinations are appropriate if the best available science and likely consequences from a range of management options have been openly acknowledged and considered. Therefore, the CAC and the Western Section Member Chapters have prepared and submitted these comments to assist the DOI in its evaluation of these National Monuments.

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Rio Grande del Norte Coalition. 2012. Economic Impacts of National Monument Designation: Rio Grande del Norte, New Mexico. Prepared by BBC Research & Consulting, Denver, CO. 23 pp. Available at: <http://www.riograndedelnorte.org/wp-content/uploads/2012/10/Economic-Impacts-of-Monument-RGDN-FINAL.pdf>.

Outdoor Industry Association. 2012. The Outdoor Recreation Economy. Available at: http://www.outdoorindustry.org/images/researchfiles/OIA_OutdoorRecEconomyReport2012.pdf?167.

If you would like any assistance from the Western Section Conservation Affairs Committee, please contact Kelly Holland at conservation@twc-west.org.

Sincerely,

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