



# CALIFORNIA FARM BUREAU FEDERATION

FEDERAL POLICY DEPARTMENT

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*Submitted via [www.regulations.gov](http://www.regulations.gov)*

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

**Re: Review of Certain National Monuments Established Since 1996  
(Docket No. DOI-2017-0002)**

Secretary Zinke:

California Farm Bureau Federation greatly appreciates the opportunity to provide comments on the Department of the Interior's comprehensive review of national monuments designated or established since 1996. California Farm Bureau Federation (Farm Bureau) is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 53,000 agricultural, associate and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

## **General Comments on National Monument Designations**

National monument designations are meant to ensure the proper care and management of historical landmarks and other objects of historic or scientific interest. While designations are intended to cover the smallest area compatible with protecting affected objects, presidents from both parties have historically taken great liberty with land-based monuments. Most recently during the Obama Administration, large designations and expansions to existing monuments were made in California. This list includes the national monument designations of Fort Ord, Cesar Chavez, San Gabriel Mountains, Berryessa Snow Mountain, Mojave Trails, Sand to Snow, and Castle Mountains. It also includes the expansion of the California Coastal and Cascade-Siskiyou National Monuments.

Use of the Antiquities Act for these mostly large tract designations does not provide reasonable notice to the public and we believe that usage of the Act has gone well beyond Congress' original intent. The Farm Bureau believes that the United States Congress should have sole authority in creating any new national monument.

Additionally, any proposal to create such a monument should first be approved by members of Congress, landowners and counties impacted by the designation.

Farm Bureau members are significantly and directly impacted by national monument designations. Many ranchers in California hold grazing permits on national monument land as well as own private property that are adjacent to national monument land. Our members also engage in public and private land forestry. Historical experience tells us that these designations often lead to devastating reduction in economic activity and the loss of jobs in resource-dependent communities because there is no requirement to determine what impact a designation will have on the local economy. Should a national monument designation occur, Farm Bureau believes that agriculture and private property rights in and around the proposed area should be preserved.

Once land is designated as a national monument, new regulations tend to greatly limit multiple uses of land such as livestock grazing or create additional restrictions on access and range-improving maintenance. Additionally, national monument designations can contain land locked private ranches as well as ranches that must be accessed through national monument land. It is essential to ensure that access to such ranches is preserved. For these reasons, Farm Bureau believes that it is essential for agricultural stakeholders to be represented on any sort of planning and/or advisory committees formed for national monument planning.

Farm Bureau has reviewed the April 26, 2017 Executive Order signed by President Trump and understands that the monument review will include all Presidential designations or expansions of designations under the Antiquities Act since January 1, 1996 where: 1) the designation covers more than 100,000 acres, 2) the designation after expansion covers more than 100,000 acres, or 3) the Secretary of the Interior determines that the designation or expansion was made without adequate public outreach and coordination with relevant stakeholders.

Therefore, based on date of designation and acreage threshold included in the Executive Order, we have determined that seven national monuments within California will automatically be included in the review. This list includes:

<b>Monuments in California Designated Since January 1, 1996 Covering More Than 100,000 Acres</b>	
Giant Sequoia National Monument	327,760 acres
Carrizo Plain National Monument	204,107 acres
San Gabriel Mountains National Monument	346,177 acres
Berryessa Snow Mountain National Monument	330,780 acres
Mojave Trails National Monument	1,600,000 acres
Sand to Snow National Monument	154,000 acres
Cascade Siskiyou National Monument	100,000 acres

We have also identified four monuments in California that have been designated since January 1, 1996 but do not meet that 100,000-acre threshold included in the Executive Order. This list includes:

<b>Monuments in California Designated Since January 1, 1996 Less Than 100,000 Acres</b>	
California Coastal National Monument	Varies by property
Fort Ord National Monument	14,658 acres
Cesar E. Chavez National Monument	116 acres
Castle Mountains National Monument	20,920 acres

**Comments Specific to Individual Monument Designations in California**

Farm Bureau offers the following comments on individual monuments within California that are incorporated in the Executive Order. In addition, we offer the following comments on the California Coastal National Monument that was not included due to acreage threshold.

Giant Sequoia

Currently, there is 27,830 acres of Giant Sequoia groves within the Giant Sequoia National Monument. Including buffers, this area totals 90,360 acres yet the monument encompasses 328,345 acres. The Antiquities Act specifies that monuments should not exceed the smallest area compatible with the proper care and management of the objects to be protected. Due to the monument designation, the non-management pattern that has resulted has led to forestlands that are in a very unhealthy condition. The Rough Fire of 2015 burned 62,683 acres and the Cedar Fire of 2016 burned an additional 6,145 acres. It is estimated that 21% of the monument has been burned since 2000.

The monument has also resulted in negative economic impacts to the area. For example, many recreation-oriented business in Tulare County have closed since the creation of the monument. These include the Springville Inn, Springville Chevron, Pierpont Springs Resort and the Cedar Slope Resort. The Ponderosa Resort is also currently for sale. The creation of the Giant Sequoia National Monument was not needed and the result of the designation has been detrimental to the local economy of Tulare County as well as the forest itself. We respectfully request that that monument be downsized to include only the groves with buffers (90,360 acres).

Carrizo Plain National Monument

Designated by President Clinton, the monument was intended to protect endangered, threatened and rare animal species as well as rare and sensitive plant species and rock art sites. Yet, we believe that amount of acreage designated goes far beyond the land base necessary to protect the items intended. Language in the original declaration assured livestock grazing permittees that they would be able to continue to turn their livestock out on the property in accordance with the practices they had followed for years. However, many attempts to graze livestock have been blocked and there have even been events organized by local groups who generally oppose livestock grazing to remove fencing.

Because the designation of the Carrizo Plain National Monument has significantly decreased grazing on federal lands within the monument, Farm Bureau requests that the monument be rescinded or drastically reducing to exclude all grazing allotments from the monument's boundaries.

#### Berryessa Snow Mountain National Monument

With the Mendocino National Forest and the Bureau of Land Management currently conducting the planning process for the monument's management plan, it is not yet clear what the implications of the 2015 designation of this monument will be. Both Yolo County Farm Bureau and Glenn County Farm Bureau, our local affiliates impacted by this designation, are on record opposing the designation.

We request that the monument be rescinded on the basis that its creation did not occur with adequate public input from impacted stakeholders, especially landowners and local governments that will be negatively impacted by the designation. Additionally, we anticipate the designation will have impacts on grazing both within the monument and on the private property adjacent to the monument. Although the designation of the monument includes language stating that public land permits or leases will continue, the way the language is worded creates uncertainty as continuance of grazing is at the discretion of both BLM and U.S. Forest Service officers.

Should the Berryessa Snow Mountain National Monument not be rescinded, we recommend the following: 1) that the U.S. Forest Service uphold the multiple use mandate for lands within the monument area and not further constrict certain productive economic uses such as timber harvest or livestock grazing; 2) livestock grazing permits, both active and vacant, should not be impacted by the national monument designation; 3) USFS grazing managers and permit holders should be included in future planning conversations; 4) Access and road maintenance within the monument should not be restricted; and 5) Private properties within or adjoining the monument should not be impacted by management decisions developed for monument lands.

#### Cascade Siskiyou National Monument

Originally designated in 2000 by President Clinton and then subsequently expanded in 2017 by President Obama, California Farm Bureau remains concerned about the risk of catastrophic fire, disease, insect infestation and the compounded impact of drought to much of the designated lands within the Cascade Siskiyou National Monument. The best way to prevent such threats from becoming a reality is the application of science-based, active forest management. Yet, designation of this land prohibits the very activities required to ensure the landscape is healthy, resilient and sustainable.

The forest products industry in California depends on the responsible management, ecological health, and long-term sustainability of the forestlands included in the designation. If the usability of this land is diminished, the local mills and mill workers who have worked in collaboration with this land for generations is also diminished. This designation and subsequent expansion undermines this long-term relationship by prohibiting responsible, active forest management, restricting public access via road closure and exposes neighboring forestlands and private property to significant risk such as fire, disease and insect outbreak.

Farm Bureau also believes the January 2017 monument expansion by President Obama did not incorporate sufficient opportunity for public participation and input. The first and

only public meeting on the proposed expansion was held in October 2016, more than 2,600 days after President Obama was elected and sworn into office. Additionally, the President never visited the area during his eight years in office nor did the Secretary of the Interior Sally Jewell make a public visit or attend the public meeting in October. The final announcement of the expansion was made in January 2017, just eight days before President Obama's second term expired. Federal legislation expanding this monument was never introduced in Congress and no Congressional hearings were held.

#### California Coastal National Monument

While Farm Bureau has concerns about the California Coastal National Monument generally, we offer the following specific concerns about two of the six properties included in President Obama's January 2017 expansion of the monument:

#### *Cotoni-Coast Dairies*

President Obama expanded the California Coastal National Monument with the addition of five properties in January 2017. One of these properties, the Cotoni-Coast Dairies (in Santa Cruz County) property, had significant local opposition. For this reason, the Farm Bureau requests that the addition of the Cotoni-Coast Dairies property be rescinded.

Santa Cruz County Board of Supervisors unanimously approved a Resolution regarding concerns about the proposed National Monument. Their requests to have the monument designation address those concerns were largely ignored. Additionally, local law enforcement and fire prevention officials testified that their agencies simply do not have the resources to provide necessary services that the predicted increase in land use will require. Local environmentalists also advocated that the addition of 100,000-400,000 visitors per year to the region would result in additional environmental harm to the property.

Regarding adequate public participation, it is our belief that the primary proponents of the monument designation misled much of the public because they failed to divulge that the property was already protected by a restrictive conservation easement. Additionally, several requests were made for local meetings to the members of Congress sponsoring the federal legislation that would establish the Cotoni-Coast Dairies property as a national monument. The sole meeting held by public officials was conducted in San Luis Obispo County in the middle of the week making it nearly impossible for most concerned citizens in Santa Cruz county to attend.

#### *Lost Coast Headlands*

Farm Bureau has many concerns regarding the inclusion of the Lost Coast Headlands property, as we believe the change in status is unnecessary and will create many hardships to the residents of the area as well as our county public works department. The condition of the road that connects the town of Ferndale with the Lost Coast Headlands property is in such a disastrous state that the safety of local citizens as well as tourists and their vehicles will be at risk. Centerville Road that leads to the monument is used for agricultural hauling of livestock and timber products and will not be able to support an increase in tourism related traffic in a safe manner. Currently, in many stretches of the road, two full commercial width vehicles cannot pass side-by-side and the funds necessary to repair and upgrade the road for this type of traffic is not available in the Humboldt County Road Maintenance and Bureau of Land Management budgets.

The designation of the property was done without adequate public outreach and coordination with relevant stakeholders. Local residents were opposed and voiced their concerns at the one community meeting held by the local Congressman Jared Huffman. Congressman Huffman also sent a letter on September 15<sup>th</sup>, 2016 to then Secretary of Interior Sally Jewell stating the following:

*“In the case of the Lost Coast Headlands, property, however, the local opposition to monument designation has been significant. Many of my constituents who live in and around Lost Coast Headlands have voiced serious reservations to outright opposition of the National monument statues there. These are the people who know this land best of all, and they have made their concerns known to me throughout the consultation process. This is why Lost Coast Headlands was not a component of the monument proposal in H.R. 3565, which I and Representatives Capps and Eshoo cosponsored last year. I strongly request that you take all my constituents’ views into account in this important matter.”*

Because this designation was made without adequate public outreach and coordination with relevant stakeholders, we request that the Lost Coast Headlands property designation be rescinded.

The California Farm Bureau Federation appreciates the opportunity to comment on the comprehensive review of national monuments designated or established since 1996. It is our hope that the Department of Interior will take appropriate actions to rescind and/or reduce the size of national monument boundaries as requested. If questions about these comments, please contact Erin Huston ([ehuston@cfbf.com](mailto:ehuston@cfbf.com)).

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Huston". The signature is fluid and cursive, with the first name "Erin" and last name "Huston" clearly distinguishable.

Erin Huston  
Federal Policy Consultant