



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

July 7, 2017

RE: Scientific Support for Expansion of the Cascade-Siskiyou National Monument

Dear Secretary Zinke,

As professional scientists with extensive experience in ecology, natural resource management and other related disciplines, we write to express our strong support for maintaining the recent expansion of the Cascade-Siskiyou National Monument (hereafter Monument) in southwest Oregon and adjacent California, as enacted by presidential proclamation in January 2017.

The Cascade-Siskiyou National Monument, originally established as 52,947 acres in June 2000, is unique among the BLM's National Conservation Lands in that it was designated specifically to preserve an area of "remarkable biological diversity." Sitting at the crossroads of four distinct ecoregions and encompassing a wide range of topography, climate and geology, the greater Cascade-Siskiyou landscape is recognized as one of the most biologically diverse places in North America.ⁱ The original Monument proclamation describes it as an "ecological wonder" that is "home to a spectacular variety of rare and beautiful species of plants and animals, whose survival in this region depends upon its continued ecological integrity".ⁱⁱ

Over a decade after the Monument was initially established, mounting scientific evidence and professional opinion indicated that the original boundaries were too small to ensure persistence of the many biological "Objects of Scientific Interest" that the Monument was originally established to protect. As summarized in a 2011 interdisciplinary report,ⁱⁱⁱ there are several reasons why previous boundaries were unlikely to sustain the ecological integrity of the Monument over the long term:

- Many special-status plant and animal populations, as well as high quality examples of the area's biotic communities identified as Objects of Interest in Monument's proclamation, remained outside existing boundaries, where they were vulnerable to incompatible management;
- Some boundaries were based solely on administrative rather than ecological criteria (e.g., the Oregon-California state line), which over time, would likely compromise the integrity of the Monument's terrestrial and aquatic ecosystems;

- Climate change in the region is altering the distributions of plants and animals that are the focal points for conservation, in some cases likely pushing them outside of original Monument boundaries, and;
- The population of southwest Oregon is growing rapidly. As a result, more areas immediately adjacent to the Monument are facing increased development or intensive land use pressures (e.g., logging, residential expansion, water diversions) that are likely to undermine long-term persistence of the Monument's biological resources.

Without Monument expansion, the bulk of scientific evidence strongly suggested that some of the area's important biological values were at high risk of irreversible degradation and loss.^{iv}

After considering these issues within the context of a much broader public review process, President Obama expanded the Cascade-Siskiyou Monument by 47,660 acres, including BLM lands in both southwest Oregon and adjacent California.^v It is important to note that this boundary enlargement was considerably smaller than what had previously been recommended by an interdisciplinary group of scientists.^{vi} Nevertheless, the end result is that revised Monument boundaries are now better aligned with what is necessary to likely sustain the area's critically important Objects of Interest. We specifically endorse and applaud expansion of this Monument because it:

- Generally includes those areas identified by scientific assessments as being most essential to sustain the area's outstanding biodiversity;^{vii}
- Contains many biological "Objects of Interest" that were highlighted in the original proclamation but under-represented within previous Monument boundaries;^{viii}
- Is likely to play a vital role in maintaining ecological integrity of the landscape the Monument was established to protect, and;
- Improves landscape and watershed connectivity with nearby federal lands, a factor that is crucial for sustaining populations of wide-ranging species and creating greater resilience in the face of climate change.^{ix}

On April 26, 2017, President Trump signed Executive Order 13792 requesting you to review many national monuments designated or expanded by previous presidents under the Antiquities Act, including Cascade-Siskiyou.^x As part of this review process now underway, we write to share with you our professional judgement that the recent expansion of the Cascade-Siskiyou National Monument is scientifically well-supported. The expansion contains an outstanding diversity of plants, animals and natural communities that clearly qualify as "Objects of Scientific Interest" under the Antiquities Act, and represents a necessary step to safeguard the numerous biological and other values for which this landscape has been widely recognized.

We believe that reducing the boundaries or diminishing any aspect of the expansion would greatly reduce the likelihood of achieving the conservation goals for which the Monument was originally established.¹ Therefore, as natural resource scientists who recognize the importance of conserving our nation's biological treasures for the benefit of present and future generations, we urge you to maintain the current Cascade-Siskiyou National Monument in all respects.

¹ Moreover, reducing this Monument's boundaries would potentially run contrary to the Antiquity Act's specific requirement that reserved areas "be confined to the smallest area compatible with the proper care and management of the objects to be protected."

Sincerely yours,

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ENDNOTES

- ⁱ USDI BLM. 2008. Resource Management Plan for the Cascade-Siskiyou National Monument. BLM/OR/WA/PT-08/018+1792. Medford District BLM, Medford, OR; see also DellaSala, D. A., et al. 1999. A global perspective on the biodiversity of the Klamath-Siskiyou ecoregion. *Natural Areas Journal* 19:300–319.
- ⁱⁱ US Dept. of Interior. 2000. Presidential proclamation 7318 establishing the Cascade-Siskiyou National Monument, Oregon. June 9, 2000. Washington, D.C.
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- ^x Presidential Executive Order on the Review of Designations Under the Antiquities Act. April 26, 2017. Available online at: <https://www.whitehouse.gov/the-press-office/2017/04/26/presidential-executive-order-review-designations-under-antiquities-act>; See also FR Doc. 2017-09490 Review of Certain National Monuments Established Since 1996; Notice of Opportunity for Public Comment. Filed 5-10-17.