

From: <Kashieka_Minor@ios.doi.gov>
To: Randal_Bowman@ios.doi.gov
Subject: DCN: EST-00003226 - Antiquities Act
Date: Tuesday, August 22, 2017 9:56:32 AM
Attachments: [3226 in.pdf](#)

>From 6/27/17.

June 5, 2017

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OFFICE OF THE
EXECUTIVE SECRETARIAT

Secretary Ryan Zinke
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Review of the Giant Sequoia National Monument

Dear Secretary Zinke:

On behalf of the California Forestry Association, the Associated California Loggers, the Loggers Association of Northern California, and the American Forest Resource Council we respectfully request that you recommend modifications to the Giant Sequoia National Monument (GSNM) as part of your review of national monuments created under the Antiquities Act pursuant to Executive Order 13792. We recommend that the GSNM should be modified to: (1) reduce the size of the monument to allow the U.S. Forest Service to better protect Giant Sequoia groves, public safety, and other unique resources from the growing threats facing forests in the Southern Sierras, including catastrophic wildfire and massive tree mortality due to overstocking, climate change, and insect infestations; and (2) alter language in the Proclamation prohibiting the removal of hazard trees that threaten public safety and access.

The 327,760-acre GSNM was carved out of the Sequoia National Forest in 2000 by President Bill Clinton through Presidential Proclamation 7295. President Clinton's Antiquities Act proclamation followed a narrower Executive Order issued in 1992 by President George H.W. Bush to protect the Giant Sequoia groves as natural areas, thereby prohibiting mining and commercial timber production. Clearly there has been longstanding support for protecting these unique Giant Sequoia groves - something we all share.

Within the current monument area, there are 38 Giant Sequoia groves constituting about 27,830 acres of forest. When zones of influence (buffers) are included the total acreage increases to just over 90,000 acres. While undoubtedly well-intentioned, President Clinton's designation of 327,760 acres went far beyond these unique forests and now restricts the ability of the U.S. Forest Service to use science-based, active forest management to thin the adjacent forests to protect the groves and buffer areas from the risks posed by catastrophic fire, disease, and insect infestations.

The threat facing the GSNM and the neighboring communities is real. In fact, over the past two years over 20 percent of the GSNM has burned, including over 62,000 acres in the 2015 Rough Fire. While it is fortunate that we have not yet lost Giant Sequoia groves in these fires, it is only a matter of time unless action is taken to reduce fuel loading and restore forest resiliency to the

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adjoining forests. The lack of forest thinning and restoration has also contributed to the massive tree mortality epidemic that has swept across the GSNM and other areas of the Southern Sierras. The U.S. Forest Service is now scrambling to cut down the hazard trees that threaten public safety and access. Unfortunately, the Presidential Proclamation that created GSNM limits the options for removing the trees.

The excessive size of the GSNM has also had a profound impact on the communities and local forest products industry infrastructure in the Southern Sierras. Since the establishment of the GSNM, the forest products infrastructure - including sawmills, loggers, and other forest contractors – has seen significant reductions and job losses. In fact, during the ten-year period prior to the creation of the GSNM, the Sequoia National Forest sold an average of over 25 million board feet (mmbf) of timber annually. In the ten-year period following President Clinton's GSNM proclamation, the Sequoia annually sold an average of just 3 mmbf. The harvest reductions have resulted in the loss of hundreds of jobs and tens of millions of dollars in local economic activity.

Sierra Forest Products, the southernmost remaining sawmill in California located in Terra Bella, continually struggles with a lack of raw material, operating on a single shift and transporting logs from significant distances. This is not sustainable in the long term. The potential loss of Sierra Forest Products and the local logging contractors would severely cripple the ability of land managers – private, state, and federal – to restore and maintain forest health across a wide swath of the Southern Sierras.

Again, we urge you to recommend that the GSNM be modified to permit the removal of hazard trees and alter the boundaries to include the approximately 90,000-acres of the Giant Sequoia groves and associated zones of influence. The Sequoia National Forest can then proactively manage the remaining acres to reduce fuel loads and protect the forest and the majestic Giant Sequoias for future generations.

Thank you for the opportunity to comment.

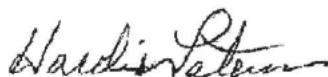
Sincerely,



Steven A. Brink
Vice President – Public Resources
California Forestry Association



Bill Acord
President
Loggers Association of Northern California



Hardie Tatum
President
Associated California Loggers



Travis Joseph
President
American Forest Resource Council

The California Forestry Association (CFA) has a membership consisting of most of the large industrial forest land owners, many non-industrial forest landowners, most of the 27-remaining medium and large sawmills and veneer mills, several biomass powerplants, and one shavings mill. CFA's mission is to create a favorable operating environment for the forest products industry, ensure a reliable wood supply from public and private lands, and promote sustainable management of forest lands.

Associated California Loggers (ACL) represents companies and individuals who harvest and transport materials for the forest products industry. Our members play a major role in the stewardship of California's public and private forests, and we're committed to the good management of this sustainable and renewable resource.

Loggers Association of Northern California is a non-profit corporation that represents loggers, road builders and truckers in the forest products industry. We are professional loggers working to keep our forests healthy and productive. We believe that California's leadership in sustainable forest management is dependent on trained and qualified loggers implementing sound management practices.

The American Forest Resource Council (AFRC) is a non-profit trade association that represents manufacturers, mill workers, loggers, and private forest landowners in five Western States: Montana, Idaho, Washington, Oregon, and California. Our members care deeply about the health and sustainability of public forestlands. In fact, the business model and future success of AFRC's members is dependent upon the responsible management, ecological health, and long-term sustainability of our public forests, including the National Forest System and BLM forestlands.

Cc: Secretary of Agriculture Sonny Perdue
Randy Moore, Regional Forester – Region Five
Congressman Kevin McCarthy
Senator Diane Feinstein



Howarth, Robert <robert_howarth@ios.doi.gov>

Fwd: Giant Sequoia National Monument - Antiquities Act Review

1 message

Williams, Timothy <timothy_williams@ios.doi.gov>
To: "Howarth, Robert" <Robert_Howarth@ios.doi.gov>

Tue, Jun 6, 2017 at 2:29 PM

Good afternoon,

Please find the attached letter to Secretary Zinke from the California Forestry Association, the Associated California Loggers, the Loggers Association of Northern California, and the American Forest Resource Council regarding the Giant Sequoia National Monument in California. This letter also be submitted consistent with the instructions included in the Federal Register Notice.

Please let me know if you have any questions.

Thank you.

Heath Heikkila

Director, Government Affairs

[American Forest Resource Council](#)

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Department Of The Interior

External and Intergovernmental Affairs

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