



The Trustees  
200 High Street, 4<sup>th</sup> Floor  
Boston, MA 02110

June 26, 2017

The Honorable Ryan Zinke  
Secretary U.S. Department of the Interior  
1849 C Street NW  
Washington, DC 20240

**Re: Secretarial Order 3349 (SO 3349 American Energy Independence), Review of National Monuments designated since 1996**

Dear Secretary Zinke:

On behalf of The Trustees, the world's first regional land trust and Massachusetts' largest conservation and historic preservation nonprofit, I strongly urge you to uphold the integrity of the public processes and executive protections that are the foundation of our national monuments. Founded in 1891 by Charles Eliot, The Trustees preserve, for public use and enjoyment, properties of exceptional scenic, historic, and ecological value in Massachusetts. Together with our 120,000 members and supporters, we protect over 27,000 acres statewide. Our reservations include barrier beaches, wildlife reserves, historic homes and estates, and farms and community gardens. The Trustees is one of the founders of the conservation movement, and our founding members were among those that originated national monuments and parks. We have worked side by side with public partners to protect special places for public use and enjoyment since our inception.

The Antiquities Act of 1906 is one of our most important federal conservation tools. Its use confers additional protections on federal lands, and 16 presidents have designated 157 national monuments since 1906. They range in size from historic sites of less than an acre to large marine monuments, protect unique and important cultural and ecological features, have had strong bipartisan support across the decades, and the tourism and recreation opportunities they create are important to local economies. The process for designating a national monument makes use of the best available science to document the resources in need of protection, includes a management strategy that ensures that multiple uses of the land can be well managed while protecting natural and cultural resources, and is built upon a robust public process. Many of our national parks began as monuments, including Acadia National Park, which had early supporters right here in Boston, Massachusetts.

The rhetoric around this review is of great concern to The Trustees, as is the uncertainty it creates. The integrity and validity of the monuments is being called into question, as well as the federal government's role in protecting these unique and special public lands. Of concern is the narrative that monuments are restrictive to natural resource extraction and energy generation. Our national monuments are a small portion of the federal estate and have been designated because of their exemplary features, many of which may not be compatible with resource extraction. Congress has an important role to play in regards to the perpetuity of national monuments. While many monuments have been enlarged, or modified, less than a dozen have been abolished and then only by Congress and none since 1956. No president has revoked a monument designation.

There are two local recently designated national monuments under review: Northeast Canyons and Seamounts Marine Monument and the Katahdin Woods and Waters. The Canyons and Seamounts Monument is the first marine monument designated off the coast of the continental U.S. Designated in 2016, it lies 150 miles off the coast of Cape Cod. It consists of extinct volcanoes and canyons deeper than the Grand Canyon. It is home to deep-water corals, anemones and sponges, as well as Kemp's ridley sea turtles and sperm, fin and sei whales. The Gulf of Maine – where the monument is located – is warming at a rate faster than almost any other marine area in the world. It is deserving of additional federal protections.

The Katahdin Woods and Waters in Maine encompasses 87,000 acres including rivers, streams, and wildlife habitat as well as many recreational opportunities such as hiking, cross-country skiing, fishing, hunting, and snowmobiling. The area was designated a national monument in 2014. The land for the monument was acquired by a long-time Maine resident and donated to the federal government, and the designation followed many years of public discussion and input.

The Trustees has protected land and cultural sites since 1891, and we know well the importance of trust in conservation. An after-the-fact review by the new administration can undermine the trust that land donors have in the United States government as well as the public process that led to the designation. In the words of President Theodore Roosevelt, who protected 230 million acres of land and designated 18 national monuments, "of all the questions which can come before this nation, short of the actual preservation of its existence in a great war, there is none which compares in importance with the great central task of leaving this land even a better land for our descendants than it is for us."

Our national monuments, which are among the most unique and valuable of our publicly owned federal lands, are our collective treasure and responsibility. We must ensure they are conserved for current and for future generations.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Barbara Erickson". The signature is written in a cursive, flowing style.

Barbara J. Erickson  
President and CEO  
The Trustees