



October 28, 2024

The Honorable Joseph Biden Jr.  
President of the United States  
1600 Pennsylvania Ave.  
Washington, D.C. 20500

**Re: Proposed S attitla National Monument in Northern California**

Dear President Biden:

We are writing to share our perspective, information, and policy, as you consider a presidential proclamation under the Antiquities Act of 1906 to designate more than 200,000 acres of national forests in Northern California for the proposed S attitla National Monument.

**AFRC and CFA Perspective**

The American Forest Resource Council (AFRC) is a trade association representing mills, wood product manufacturers, loggers, and purchasers of public timber in the Western United States. The California Forestry Association (CFA) represents a diverse group including private timberland owners, forest products manufacturers, biomass energy producers and related businesses.

Put another way, AFRC and CFA represent the neighbors, customers, and partners of the Forest Service and other federal land managers to steward public and private lands in Northern California.

Our members' expertise, employees, and equipment—and the vast, complex product supply chain of the forest infrastructure they help create, maintain, and support—are essential to achieving the Forest Service's management goals and mission, including restoring forest health and resiliency, maintaining public access to public lands; addressing the federal wildfire crisis; and protecting at-risk rural communities. AFRC and CFA members would be directly impacted by the proposed S attitla National Monument that would overlay portions of the Klamath, Modoc, and Shasta-Trinity National Forests.

It is important to note that AFRC and CFA members share many of the social, cultural, environmental, and economic values expressed by supporters of the S attitla National Monument proposal. These values—forest health, clean air, clean water, abundant aquatic and terrestrial wildlife habitat, world class recreational opportunities, safe communities, protected cultural

resources and meaningful tribal engagement and co-management—face unprecedented risks from past and future catastrophic wildfires. Addressing these risks, as your Administration rightly highlighted in the Wildfire Crisis Strategy, requires intentional, science-based, proactive action on the ground.

Yet, we cannot identify a successful example of a national monument created by a presidential proclamation at this scale that has resulted in focused, accelerated, timely, proactive action on the ground to address our wildfire and forest health crises. In fact, quite the opposite. Examples include the Berryessa-Snow Mountain National Monument that was severely burned in the August Complex Wildfire (2020) and the lengthy list of wildfires in the Sequoia National Monument.

### **Information and Policy Context**

As you consider the S ttitla National Monument proposal, we hope you and your advisors will keep in mind the existing processes, policies, and direction your Administration is working to complete on the exact same landscape. Consider, for example:

[\*The Wildfire Crisis Strategy\*](#). The ‘‘Confronting the Wildfire Crisis’’ strategy document was released by the Forest Service in January 2022. The document highlighted 21 priority landscapes across the West. The S ttitla National Monument proposal includes, or is adjacent to, more than a dozen high-risk firesheds. According to the document, ‘‘Firesheds, typically about 250,000 acres in size, are mapped to match the scale of community exposure to wildfire. In order to reduce wildfire risk to communities, forest health, and other values, science suggests that fire-adapted conditions should be restored on 35 to 40 percent of a fireshed through a range of fuels and forest management activities, including mechanical thinning and prescribed fire, followed by maintenance treatments at intervals of 10 to 15 years.’’

In February of this year, your Administration expanded and designated the Klamath River Basin as the largest national landscape in need of restoration and federal investment. The Klamath River Basin includes 10 million acres of some of the most at-risk, fire prone lands in the United States. Fifty-five percent of the massive area, which generates 80 percent of the annual mean surface water supply to the Klamath River, is managed by the Forest Service and directly overlaps with the proposed S ttitla National Monument, including the Klamath, Modoc, and Shasta-Trinity National Forests.

In its press release announcing the Klamath River Basin designation, the U.S. Department of Agriculture committed to treating more than 200,000 acres of this landscape by 2031. How will a presidential proclamation creating a national monument on this at-risk landscape interact with and accelerate the goals, funding commitments, and on-the-ground treatments promised by the Wildfire Crisis Strategy? Further, we think the Monument proposal must address fire suppression issues including: 1) restrictions on suppression tactics, 2) cross-boundary fire suppression features such as fuel breaks and Potential Operation Delineations (PODs), and 3) reforestation.

We also point out that presidential proclamations under the Antiquities Act do not require analysis or public disclosure of social, economic, or environmental impacts of the designation as

other federal agency actions require under the National Environmental Policy Act; do not require consultation with Tribes and tribal sovereign nations; and do not require consultation with federal regulatory agencies under the Endangered Species Act, Clean Air Act, or Clean Water Act. The most inclusive, transparent, and democratic process for making management changes to federal lands is through the Congress, or through existing, established federal laws that require exhaustive public input, analysis, and adjudication.

*[The National Old Growth Amendment](#)*. At the same time, the Forest Service is nearing completion of a National Old-Growth Amendment (NOGA), an effort to simultaneously amend 128 forest plans nationwide, covering 193 million acres. The stated goal of this effort is to create a consistent approach to protecting and conserving old-growth forests on national forest system lands from wildfire, disease, and insect infestations.

The NOGA, expected to be finalized in December, will amend the forest plans of the Klamath, Modoc, and Shasta-Trinity National Forests, potentially providing new management goals and direction to the Forest Service. Forest Service staff will have to be educated and trained about how the NOGA and new plan direction impact planned or future management activities on the Klamath, Modoc, and Shasta-Trinity National Forests.

*[The Northwest Forest Plan Amendment](#)*. At the same time as NOGA, and impacting the same landscape, the Forest Service is working to finalize an amendment to the Northwest Forest Plan, the guiding forest management plan for 24 million acres of national forests in the Pacific Northwest and Northern California. The Northwest Forest Plan Amendment will amend the forest plans for the Klamath, Modoc, and Shasta-Trinity National Forests, just months after those same forest plans will be amended by the NOGA.

Secretary of Agriculture Tom Vilsack established a [Federal Advisory Committee](#) (FAC) to advise the Forest Service in developing and implementing the Northwest Forest Plan Amendment. The FAC produced 192 consensus recommendations to help modernize and improve the original Northwest Forest Plan, which was first implemented in 1994 and has remained largely unchanged.

Tribes and Indigenous peoples, including more than 80 federally recognized Tribes, were left out of the design, development, and implementation of the Northwest Forest Plan. That was wrong, is unacceptable, and must be changed. More than 100 of the 192 FAC recommendations focus on tribal engagement, tribal co-stewardship and management, and honoring and incorporating indigenous knowledge and science into land management decisions. These recommendations, if implemented, would go a long way in protecting the cultural resources, first foods, and cultural heritage within the proposed S  ttitla National Monument area. We strongly encourage you to direct the Forest Service to meaningfully engage and consult with federally recognized Tribes and indigenous peoples about the future management of this land.

## Conclusion

While we understand and share many of the values and stated outcomes highlighted by proponents of the S ttitla National Monument proposal, we ask that you consider the practical implications and consequences of using the Antiquities Act to designate a national monument on this at-risk, complex landscape.

Consider this: a S ttitla National Monument designation would overlay a presidential proclamation requiring a management plan over existing, legal, publicly vetted forest plans; which are the focus of the Wildfire Crisis Strategy overlaid with high-risk firesheds with specific treatment goals; which will be amended by the National Old-Growth Amendment in the winter of 2024; which will then be amended by the Northwest Forest Plan Amendment in spring of 2025. All of this would occur while the Forest Service is experiencing a historic budget crisis that has required the agency to freeze hiring.

This is a recipe for confusion, complexity, conflict, legal vulnerability and—most importantly—not achieving your vision, or the vision of monument proponents, on the ground.

Instead, we hope you will invest in and trust the existing democratic processes outlined above that require transparency with the public, detailed analysis and thoughtful decision making, and inclusivity of diverse interest groups to find balanced, flexible, durable solutions to protect this extraordinary landscape from existing threats and to leave a proud legacy of responsible stewardship to future generations.

Sincerely,



Travis Joseph  
President  
American Forest Resource Council



Matt Diaz  
President/CEO  
California Forestry Association