

Mike Connor
Deputy Secretary
United State Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Deputy Secretary Connor:

On behalf of the Medford/Jackson County Chamber of Commerce Board of Directors, this letter is to express our opposition to the proposed expansion of the existing Cascade-Siskiyou National Monument under the federal Antiquities Act. We respectfully ask the Obama Administration and the Department of the Interior to carefully consider the concerns of many citizens in our Jackson County communities, many of whom were unable to attend U.S. Senator Jeff Merkley's meeting on October 14.

The proposed expansion of the Cascade-Siskiyou National Monument would have serious implications on Jackson County's economy, environment and local governance. We do not believe these impacts have been sufficiently assessed since Senator Merkley's office released details of the proposed expansion on October 7. In addition, it has been very difficult to obtain information from the Bureau of Land Management on how the proposal would affect management of BLM O&C Lands, local watersheds and adjacent private properties.

We do not believe these short- and long-term impacts will be truly known before the end of President Obama's term. And we have grave doubts the monument status would offer the "flexibility" needed to address any problems related to the expansion after the fact.

Jackson County is home to abundant natural resources that should be utilized and enjoyed by residents and visitors alike. Ranching, timber and tourism are all pillars of our local economy, and we do not believe they are mutually exclusive. We are unclear how the monument expansion would create more family-wage jobs and generate more economic activity in our communities. But we are very concerned about how a monument expansion would affect these economic pillars, considering the system of federal land management and the additional restrictions that often come when a monument is established.

Jackson County has experienced a number of devastating catastrophic wildfires since 2000, when the Cascade-Siskiyou National Monument was originally established. These large and unnatural wildfires have a negative and disruptive effect on our small businesses, public safety systems, recreational amenities, and tourist attractions. These fires commonly fill our valleys with toxic smoke, threatening the health of vulnerable citizens and straining our public and private health care systems.

We have been clear with the federal government and Oregon's congressional delegation on the importance of actively managing non-reserved BLM and U.S. Forest Service lands, not only for the benefit of our economy, but to contain the size, severity and costs associated with these fires. We are also concerned with how land management restrictions and wildfires affect the Rogue

Valley's water quality and quantity, especially given the monument expansion's close proximity to the Talent Irrigation District. It is highly unlikely that more management activities will occur on lands set aside as a national monument; yet it is our communities who will continue to face the consequences of unhealthy and un-managed federal lands.

We are aware that individual property owners within, and adjacent to, the proposed expansion area have expressed concerns with how a larger national monument would affect access, structures, personal safety and the health and productivity of their own lands. We share their concerns, and particularly want to emphasize the issue of access to private and public lands. The monument expansion will inevitably bring additional road closures on federal lands. This is problematic for many reasons, including the fact that additional closures of existing roads would further restrict the ability of agencies to respond to public safety emergencies, such as catastrophic wildfires that move across forest lands regardless of ownership.

Additional road closures would also reduce access for many Americans, especially senior citizens and those with disabilities. While we support promoting recreational opportunities on public lands, federal policy makers should recognize that our recreational economy depends on motorized access into and within federal lands. Not only would the national monument expansion deny many Americans the ability to access and enjoy their federal lands, we are concerned the expansion could negatively impact our small businesses in the tourism sector.

As you know, the federal O&C Act requires the BLM to actively and sustainably manage its O&C timberlands for the benefit of our communities, and principally to generate revenues for O&C host counties. The dramatic reduction in timber harvests since the 1990s have resulted in job losses and business closures in Jackson County. The lack of timber receipt revenues, and years of declining payment levels under the Secure Rural Schools program, has significantly limited county government's ability to sustain essential public services, law enforcement, public health and mental health programs. As our communities continue to suffer from high poverty and unemployment levels, expansion of the monument will only further limit the county government's ability to preserve our social safety net. For these reasons, we join the Association of O&C Counties in strongly opposing the inclusion of any BLM O&C lands in any national monument.

The Medford/Jackson County Chamber of Commerce Board of Directors understand that federal lands within the proposed expansion area are special areas that provide a number of benefits to our residents and the American public. But we believe expanding the current Cascade-Siskiyou National Monument under the federal Antiquities Act is not the right solution for protecting and sustaining these lands for current and future generations.

Once again, we respectfully urge the Obama Administration and the Department of the Interior not to expand the Cascade-Siskiyou National Monument under the federal Antiquities Act. We believe the legislative process, and ultimately a vote of Congress, is the most appropriate, transparent and democratic way to consider the expansion and accurately assess its impacts.

Thank you for the opportunity to comment.

Sincerely,

David Wright
Chair of the Board

Brad S. Hicks, CCE
President & CEO