

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

<p>DANIEL TORONGO and BLUERIBBON COALITION, INC.,</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p>v.</p> <p>DOUGLAS BURGUM, in his official capacity as Secretary of the Interior; BUREAU OF LAND MANAGEMENT; and THE UNITED STATES DEPARTMENT OF THE INTERIOR,</p> <p style="text-align: center;"><i>Defendants.</i></p>	<p style="text-align: center;">Case No. 4:25-cv-11263</p> <p style="text-align: center;">Hon. F. Kay Behm</p> <p style="text-align: center;"><b>TRIBAL NATIONS’ MOTION TO INTERVENE</b></p>
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Pursuant to Federal Rule of Civil Procedure (“FRCP”) 24(a)(2), or, in the alternative 24(b), the Chemeheuvi Indian Tribe (“Chemehuevi”), the Colorado River Indian Tribes (“CRIT”), the Morongo Band of Mission Indians (“MBMI”), the Torres Martinez Desert Cahuilla Indians (“Torres Martinez”), and the Fort Yuma Quechan Indian Tribe (“Quechan”) (collectively, “Tribal Nations”) respectfully move this court to intervene as defendants in this matter. Pursuant to FRCP 24(c), a proposed answer is attached to this Motion as Exhibit A.

The Tribal Nations have unique interests in this litigation and seek to intervene to protect those interests. The Tribal Nations fulfill all the criteria to intervene as a matter of right under Rule 24(a)(2) or, in the alternative, for permissive intervention under Rule 24(b)(1).

Pursuant to LR 7.1(a), counsel for the Tribal Nations conferred with counsel for the parties to determine if they would concur in the motion to intervene, explaining the nature of and basis for the motion. Defendants take no position on this motion. Plaintiffs provided the following statement: "At this time, Plaintiffs take no position on the motions to intervene. Plaintiffs reserve the right to file responses after reviewing the motions in their entirety."

Pursuant to LR 7.1(d)(1)(A), a brief in support of this motion accompanies this motion.

Dated: August 11, 2025

Respectfully Submitted,

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**IN THE UNITED STATES DISTRICT COURT  
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DANIEL TORONGO and  
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*Plaintiffs,*

v.

DOUGLAS BURGUM, in his  
official capacity as Secretary of the  
Interior; BUREAU OF LAND  
MANAGEMENT; and THE  
UNITED STATES DEPARTMENT  
OF THE INTERIOR,

*Defendants.*

Case No. 4:25-cv-11263

Hon. F. Kay Behm

**BRIEF IN SUPPORT OF  
TRIBAL NATIONS'  
MOTION TO INTERVENE**



**CONCISE STATEMENT OF THE ISSUES PRESENTED**

- I. Whether the Chemeheuvi Indian Tribe, the Colorado River Tribes, the Morongo Band of Mission Indians, the Torres Martinez Desert Cahuilla Indians, and the Fort Yuma Quechan Indian Tribe (collectively, “Tribal Nations”) are entitled to intervene pursuant to Federal Rule of Civil Procedure 24(a)(2).
- II. Whether, in the alternative, the Court should permit the Tribal Nations to intervene pursuant to Federal Rule of Civil Procedure 24(b).

**CONTROLLING OR MOST APPROPRIATE AUTHORITY**

**Rules**

Fed. R. Civ. P. 24(a)(2)

Fed. R. Civ. P. 24(b)

**Cases**

*Mich. State AFL-CIO v. Miller*, 103 F.3d 1240 (6th Cir. 1997)

*Utah Ass'n of Counties v. Clinton*, 255 F.3d 1246 (10th Cir. 2001)

*WildEarth Guardians v. Nat'l Park Serv.*, 604 F.3d 1192 (10th Cir. 2010)

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## INTRODUCTION

The Tribal Nations respectfully seek to intervene in this challenge to the establishment of Chuckwalla National Monument. The Tribal Nations are the original stewards of Chuckwalla, and the region continues to be of immense religious, spiritual, historic, and cultural significance to them today. It contains sites, trails, petroglyphs, and countless other items that the Tribal Nations have long sought to preserve. The Tribal Nations thus championed the extension of monument protections to Chuckwalla, and their advocacy led directly to the Monument's establishment.

Because of their unique, sovereign interests in Chuckwalla, the Tribal Nations are entitled to intervene in this suit pursuant to Federal Rule of Civil Procedure 24(a)(2). Plaintiffs' suit directly threatens the Tribal Nations' interests by seeking to invalidate the Monument altogether. And the Federal Defendants, for their part, do not share the Tribal Nations' unique interests. In fact, it is not even clear whether the Federal Defendants share the ultimate goal of preserving the Monument. The Tribal Nations may thus intervene as of right under Rule 24(a)(2) to ensure the Monument is defended.

In the alternative, the Court should permit the Tribal Nations to intervene under Federal Rule of Civil Procedure 24(b). As Chuckwalla's

original stewards, the Tribal Nations should be allowed to defend against this attack on its protections. For these reasons and those set forth below, the Court should grant the Tribal Nations' motion to intervene.

### **BACKGROUND**

"In southeastern California, where the Mojave and Colorado Deserts intersect, ancient trails weave through a land of canyon-carved mountain ranges bound together by radiating alluvial bajadas and dark tendrils of dry wash woodlands." 90 Fed. Reg. 6715, 6715 (Jan. 14, 2025). This area is Chuckwalla. It is part of the traditional homelands of the Tribal Nations, federally recognized Indian tribes who are among the Iviatim (Cahuilla), Nüwü (Chemehuevi), Pipa Aha Macav (Mojave), Kwatsáan (Quechan), Maara'yam and Marringayam (Serrano), and other Indigenous peoples. *Id.* Since time immemorial, the Tribal Nations have used the area for food and trade, to conduct religious ceremonies, and to raise their families. *See generally id.*

Reflecting this history, Chuckwalla and the Tribal Nations are deeply connected today. Like the wide-bodied lizard found throughout its landscape, Chuckwalla National Monument derives its very name from the Cahuilla word "čáxwal." 90 Fed. Reg. 6715, 6715 (Jan. 14, 2025). The



Monument's ancient trails—which once “facilitated trade and cultural exchange between peoples throughout the Southwest” —remain sacred to the Tribal Nations. *Id.* at 6715-16. They, along with tools, habitation sites, petroglyphs, and pictographs left behind by the Tribal Nations' ancestors, mark the area with the “imprints of generations of Indigenous peoples.” *Id.* at 6715. The area is thus “imbued with religious, spiritual, historic, and cultural significance” for the Tribal Nations, and it helps ensure the Tribal Nations can maintain their ways of life for generations to come. *Id.*

These lands and items, however, are under threat. Recognizing this, the Tribal Nations campaigned to establish Chuckwalla National Monument. *See Statements and Releases, President Biden Builds on Historic Conservation Legacy, Establishes Chuckwalla and Sattitla Highlands National Monuments in California*, White House (Jan. 16, 2025) [hereinafter *White House Statements and Release*], <https://bidenwhitehouse.archives.gov/briefing-room/statements-releases/2025/01/16/what-they-are-saying-president-biden-builds-on-historic-conservation-legacy-establishes-chuckwalla-and-sattitla-highlands-national-monuments-in-california/>. Through national monument status, the Tribal Nations sought to safeguard the area's diverse geographic landscape, its sacred and historic places, its ecological,

geological, and cultural resources, and the plant and animal species located within. *Id.*

The Tribal Nations' advocacy bore fruit. On January 14, 2025, President Biden established Chuckwalla National Monument. Through the Monument Proclamation, President Biden extended new legal protections to Chuckwalla and its resources. He also provided for tribal co-stewardship of the Monument. 90 Fed. Reg. 6715, 6722 (Jan. 14, 2025).

Plaintiffs have filed this suit alleging that President Biden violated the Constitution and other federal law when he established the Monument. Plaintiffs named as defendants Secretary of the Interior Douglas Burgum, the U.S. Bureau of Land Management, and the U.S. Department of the Interior. Plaintiffs ask the Court, among other things, to “[h]old unlawful and set aside the creation and establishment of the Chuckwalla National Monument.” Plaintiff’s Complaint, ECF No. 1, PageID.30 (“Compl.”). Federal Defendants have not yet responded to Plaintiff’s Complaint.

## ARGUMENT

### I. THE TRIBAL NATIONS ARE ENTITLED TO INTERVENE AS OF RIGHT

The Tribal Nations seek to intervene as of right under Federal Rule of Civil Procedure 24(a)(2), which provides:

On timely motion, the court must permit anyone to intervene who . . . claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant's ability to protect its interest, unless existing parties adequately represent that interest.

Under this rule, once an intervenor establishes that (1) the application was timely filed; (2) the intervenor possesses a substantial legal interest in the case; (3) the intervenor's ability to protect its interest will be impaired without intervention; and (4) the existing parties will not adequately represent the intervenor's interest, the Court "must permit" intervention. *Blount-Hill v. Zelman*, 636 F.3d 278, 283 (6th Cir. 2011). "Rule 24 should be 'broadly construed in favor of potential intervenors.'" *Stupak-Thrall v. Glickman*, 226 F.3d 467, 472 (6th Cir. 2000) (quoting *Purnell v. Akron*, 925 F.2d 941, 950 (6th Cir. 1991)). Further, "the court 'must accept as true the non-conclusory allegations of the motion.'" *Dumont v. Lyon*, Case No. 17-cv-13080, 2018 WL 8807229, at \*6 (E.D. Mich. Mar. 22, 2018). As demonstrated

below, the Tribal Nations satisfy all four criteria to intervene as a matter of right.

**A. The Tribal Nations' Motion to Intervene is Timely**

It is indisputable that the Tribal Nations' motion to intervene is timely. This lawsuit is at its earliest stage. The Federal Defendants have not yet responded to the Complaint, and the case has not otherwise progressed. Intervention will thus not cause delay or unfairly prejudice any existing parties to the suit. *See Priorities USA v. Benson*, 448 F. Supp. 3d 755, 763 (E.D. Mich. 2020) (finding intervention timely when motion filed early in proceedings and no resulting prejudice).

**B. The Tribal Nations Have Substantial Legal Interests in this Suit**

The Tribal Nations also satisfy the second element of the Rule 24(a)(2) test because they possess substantial legal interests in Chuckwalla National Monument. The Sixth Circuit uses an "expansive notion of the interest sufficient to invoke intervention of right." *Mich. State AFL-CIO v. Miller*, 103 F.3d 1240, 1245 (6th Cir. 1997). "[A]n intervenor need not have the same standing necessary to initiate a lawsuit," or even "a specific legal or equitable interest." *Id.* (quotation mark omitted). Rather, a claimed interest is sufficiently substantial if it is at least "significantly protectable." *Wineries of*

*the Old Mission Peninsula Ass'n v. Twp. of Peninsula*, 41 F.4th 767, 772 (6th Cir. 2022) (quoting *Grubbs v. Norris*, 870 F.2d 343, 346 (6th Cir. 1989)).

Courts in the Sixth Circuit have not had an opportunity to address intervention in the specific context of challenges to national monuments, but courts in the Tenth Circuit have. In accord with the “expansive notion” of qualifying interests used in the Sixth Circuit, courts in the Tenth Circuit have recognized a wide range of qualifying interests in monument challenges. “[R]ecreational, religious, and cultural interests in the [protected] regions” qualify. *Garfield Cnty. v. Biden*, Nos. 4:22-cv-00059, 4:22-cv-00060, 2023 WL 2561539, at \*4 (D. Utah Mar. 17, 2023). A prospective intervenor’s “environmental concern” with respect to a monument “is a legally protectable interest” too. *WildEarth Guardians v. Nat’l Park Serv.*, 604 F.3d 1192, 1198 (10th Cir. 2010) (describing this interest as “indisputable”). And a prospective intervenor can also show a legally protected interest in a monument when the intervenor “advocated setting aside the land at issue.” *Id.* at 1199.

The Tribal Nations have each of those interests here (any of one of which suffices to justify intervention). First, they have religious and cultural interests in the Monument. As Plaintiffs themselves acknowledge, “[t]he

proclamation places the most emphasis on the ‘religious, spiritual, historic, and cultural significance for Tribal Nations.’” Compl., PageID.3 ¶ 8; *see* 90 Fed. Reg. 6715, 6715 (Jan. 14, 2025) (explaining that the Monument “is imbued with religious, spiritual, historic, and cultural significance for Tribal Nations that trace their origins to these lands”). “The imprints of generations of Indigenous peoples are found throughout the region in the trails, tools, habitation sites, and spectacular petroglyphs and pictographs they left behind.” *Id.* And these trails, items, and sites “were, and are, essential to the people who trace their origins to these lands, and provide a sense of connection between generations and between the physical and spiritual worlds.” *Id.* at 6716. Because the protection of these religious, spiritual, historic, and cultural properties was a primary reason for establishing the Monument, *see id.* at 6720, the Tribal Nations have a substantial legal interest in this suit.

Second, the Tribal Nations have an interest in “advanc[ing] conservation goals by preserving the undeveloped quality of the lands encompassing the monument.” *WildEarth Guardians*, 604 F.3d at 1198-99. Recognizing the Tribal Nations’ expertise and role in the “proper care and management” of Chuckwalla, 90 Fed. Reg. 6714, 6722 (Jan. 14, 2025), the

Monument Proclamation not only establishes environmental protections; it provides the Tribal Nations a government-to-government role in the protection of the Chuckwalla environment. *See id.* at 6721-22. For instance, the Proclamation directs the Secretary of the Interior to “meaningfully engage” with a tribal commission about “the development, revision, or amendment of the management plan and the management of the monument” to ensure that management of the Monument incorporates “Indigenous Knowledge and special expertise.” *Id.* at 6722. This environmental interest—not just in the protections that stem from monument status, but in co-managing the region going forward—also qualifies under Rule 24(a)(2).

Finally, the Tribal Nations have a protected interest in the Monument because it is the direct result of their advocacy. *See Protect California Deserts, Tribal Leaders and Local Communities Celebrate the Announcement of Chuckwalla National Monument Designation*, Protect Chuckwalla (Jan. 7, 2025), <https://protectchuckwalla.org/2025/01/07/tribal-leaders-and-local-communities-celebrate-the-announcement-of-chuckwalla-national-monument-designation/> (describing the Tribal Nations’ call to establish the Monument). The Monument’s establishment “reflect[ed] years of tireless

work from tribal leaders to protect these sacred desert landscapes.” *White House Statements and Release* (statement of Senator Alex Padilla); *see id.* (collecting statements from tribal leaders); *see also id.* (statement of Governor Gavin Newsom) (recognizing the “leadership of California tribes” in the Monument’s establishment). For this reason, too, the Tribal Nations have a substantial interest in this suit. *Miller*, 103 F.3d at 1246-47 (finding sufficient interest where intervenors played a role in the political process that resulted in the contested governmental action).

**C. The Tribal Nations’ Ability to Protect Their Interests Will Be Impaired Should Intervention Be Denied**

Absent intervention, the Tribal Nations’ interests in protecting Chuckwalla’s national monument status will be impaired. To satisfy this element, an intervenor need merely show that impairment of its substantial legal interest is “possible” if the court denies intervention. *Miller*, 103 F.3d at 1247. The burden to satisfy this element is “minimal.” *Id.*

This element is easily met here. Defendants ask the Court to declare that the “establishment of the Chuckwalla National Monument is contrary to the Constitution and federal statute” and to prohibit “Defendants from enforcing” the Monument Proclamation. Compl. at PageID.29-30. This



relief would strip national monument protections from the countless tribal items and places within the Monument's boundaries. It would nullify the tribal co-stewardship provisions found in the Proclamation. And it would render meaningless the Tribal Nations' efforts to establish the Monument in the first place. There is thus no question that this suit threatens the Tribal Nations' "ability to protect their interest[s] in the monument itself." *Utah Ass'n of Counties v. Clinton*, 255 F.3d 1246, 1253 n.5 (10th Cir. 2001) (holding that potential invalidation of a national monument satisfies the impairment requirement).

**D. The Federal Defendants Do Not Adequately Represent the Tribal Nations' Interests**

Finally, the Federal Defendants do not adequately represent the Tribal Nations' interests. To satisfy this last part of the Rule 24(a)(2) inquiry, an intervenor need only show that the existing party's representation of its interest "*may be*" inadequate. *Wineries of the Old Mission Peninsula Ass'n*, 41 F.4th at 774 (quotations marks omitted) (emphasis in original). The burden here is minimal, and is satisfied when the intervenor can show "that there is a potential for inadequate representation." *United States v. Michigan*, 424

F.3d 438, 443 (6th Cir. 2005) (quoting *Grutter v. Bollinger*, 188 F.3d 394, 400 (6th Cir. 1999)).

The Tribal Nations have met their burden. To start, it is not clear that the Federal Defendants seek the same outcome as the Tribal Nations. On February 3, 2025, Secretary of the Interior Doug Burgum—one of the federal defendants here—directed his assistant secretaries to “review and, as appropriate, revise all withdrawn public lands,” and included Chuckwalla National Monument as a target for review. U.S. Sec’y of Interior, *Secretarial Order No. 3418, Unleashing American Energy* 6 (Feb. 3, 2025). The following month, the White House issued a fact sheet titled “President Donald J. Trump Rescinds Additional Harmful Biden Executive Actions” that claimed President Trump had terminated “proclamations declaring nearly a million acres constitute new national monuments that lock up vast amounts of land from economic development and energy production,” and it told the Washington Post that it planned to eliminate Chuckwalla National Monument (the claim in the fact sheet was later quietly withdrawn). White House, *Fact Sheet: President Donald J. Trump Rescinds Additional Harmful Biden Executive Actions*, Fact Sheet (Mar. 14, 2025), <https://web.archive.org/web/20250315033947/https://www.whitehouse.>

gov/fact-sheets/2025/03/fact-sheet-president-donald-j-trump-rescinds-additional-harmful-biden-executive-actions/; see Rachel Frazin, *White House says it will eliminate national monuments – then scrubs the announcement*, The Hill (Mar. 27, 2025), <https://thehill.com/policy/energy-environment/5198542-white-house-national-monuments-elimination-announcement/>. It is thus possible that the Federal Defendants do not share the same ultimate goal as the Tribal Nations. In fact, the Federal Defendants might share the *Plaintiffs'* ultimate goal: elimination of the Monument.

Even if the Federal Defendants decide to protect Chuckwalla—and even if they could guarantee they would stay committed to that position throughout this litigation—intervention is still required. The test is not “simply [whether] . . . the [d]efendants and the proposed intervenor both want the same outcome.” *Wilkins v. Daniels*, No. 2:12-CV-1010, 2012 WL 6015884, at \*4 (S.D. Ohio Dec. 3, 2012). Rather, the test is whether there is a “*potential*” that the existing defendants “may not adequately represent the [intervenor’s] interests.” *Grutter*, 188 F.3d at 400 (emphasis in original). That is the case when government defendants “represent the general public as a whole and are focused on the affirmance . . . in general, whereas the

[intervenor] has more specialized goals in mind and brings a unique perspective to th[e] litigation.” *Wilkins*, 2012 WL 6015884, at \*4.

Those are the exact circumstances here. The Tribal Nations possess unique, sovereign interests in Chuckwalla grounded in the Nations’ ancestral and cultural relationship with the area. They seek to preserve their role in the co-stewardship of their traditional homelands and to ensure that these lands and items are managed in a culturally appropriate manner. Thus, even if the Federal Defendants seek to preserve the Monument, they will “share an interest in the ultimate outcome of this case for very different reasons [from the Tribal Nations].” *Klamath Irrigation Dist. v. U.S. Bureau of Reclamation*, 48 F.4th 934, 945 (9th Cir. 2022). Because of this divergence, the Tribal Nations are entitled to intervene under Rule 24. *See id.* (recognizing that federal agency did not adequately represent Tribal Nations despite seeking same outcome); *Utah Ass’n*, 255 F.3d at 1256 (concluding that the federal government was not an adequate representative of intervenors in a monument-establishment challenge).

This conclusion is underscored by the fact that “[t]he government has taken no position on the motion to intervene in this case.” *Id.* “Its ‘silence on any intent to defend the intervenors’ special interests is deafening.’” *Id.*

(brackets omitted) (quoting *Conservation L. Found. of New England, Inc. v. Mosbacher*, 966 F.2d 39, 44 (1st Cir. 1992)). Federal Defendants do not share the Tribal Nations’ particularized interests in Chuckwalla, and thus they are inadequate representatives for purposes of Rule 24(a)(2).

## **II. ALTERNATIVELY, THE TRIBAL NATIONS MEET THE REQUIREMENTS FOR PERMISSIVE INTERVENTION**

In the alternative, the Court should allow the Tribal Nations to permissively intervene pursuant to Federal Rule of Civil Procedure 24(b). Rule 24(b) allows for permissive intervention where a party timely files a motion and “has a claim or defense that shares with the main action a common question of law or fact.” In exercising its discretion under Rule 24(b), the Court “must consider whether the intervention will unduly delay or prejudice the adjudication of the original parties’ rights.” Fed. R. Civ. P. 24(b)(3).

The Tribal Nations satisfy the permissive-intervention test. The Tribal Nations’ defenses revolve around the same common questions of law and fact as the claims in the main action—whether President Biden’s proclamation designating the Chuckwalla National Monument was lawful.

Moreover, the Tribal Nations' motion is timely and no prejudice will result from granting intervention, for the reasons explained above.

Ultimately, if Plaintiffs prevail, Chuckwalla could lose monument protections entirely. The Tribal Nations—the original stewards of Chuckwalla—should be allowed to defend against that attack.

### CONCLUSION

The Court should grant the Tribal Nations' motion to intervene.

Dated: August 11, 2025

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### **CERTIFICATE OF SERVICE**

I certify that on August 11, 2015, I electronically filed the foregoing using the CM/ECF system, which will send notification of such filing to counsel of record. I further certify that I have mailed by United States Postal Service a bound Courtesy Copy to Judge F. Kay Behm.

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Flint, MI 48502



# Tribal Leaders and Local Communities Celebrate the Announcement of Chuckwalla National Monument Designation

*Designation Will Honor Tribal Sovereignty, Boost the Local Economy, and Ensure Access to Nature*  
**Press Release | January 7, 2025**

**COACHELLA, CA** — Today, Tribal leaders, elected officials, and local community members celebrated President Biden’s announcement that he plans to designate Chuckwalla National Monument in the California desert and Sáttítla Highlands National Monument in Northern California.

“Establishing the Chuckwalla National Monument is another major victory for safeguarding California’s public lands for generations to come,” said **Senator Alex Padilla**. “This historic announcement accelerates our state’s crucial efforts to fight the climate crisis, protect our iconic wildlife, preserve sacred tribal sites, and promote clean energy while expanding equitable access to nature for millions of Californians. This designation reflects years of tireless work from tribal leaders to protect these sacred desert landscapes. President Biden has joined California leaders in championing our treasured natural wonders, and I applaud him for further cementing his strong public lands legacy.”

The new Chuckwalla National Monument will reach from the Coachella Valley region in the west to near the Colorado River in the east. It will protect more than 624,000 acres of public lands located south of Joshua Tree National Park. The designation will advance local priorities in the Eastern Coachella Valley, including honoring Tribal sovereignty, boosting the local economy, and ensuring access to nature. The monument boundaries were also specifically drawn to avoid areas identified as suitable for renewable energy development, and the proposal garnered support from the renewable energy industry.

“I am thrilled that President Biden will designate the Chuckwalla National Monument using the Antiquities Act,” said **Congressman Raul Ruiz (CA-25)**. “After years of negotiation and bringing several communities together, this achievement was made possible through the leadership and partnership of many organizations, tribes, and community leaders. Chuckwalla National Monument will pave the way for the future of conservation and renewable energy. I greatly appreciate Senators Padilla and Butler for their support and partnership over the last several years.”

Seven Tribes—along with local cities, elected officials, businesses, scientists, veterans, residents, and more—called for Chuckwalla National Monument and urged the president to protect this important cultural landscape.

“For thousands of years, the Torres Martinez Desert Cahuilla Indians have called the lands in the Chuckwalla National Monument home,” said **Joseph DL Mirelez, Chairman of the Torres Martinez Desert Cahuilla Indians**. “We are happy to see the designation protect this area that contains thousands of cultural places and objects of vital importance to the history and identity of the Torres Martinez Desert Cahuilla Indians.”

The Chuckwalla National Monument is part of a living landscape that holds spiritual significance for many Tribes. The new monument will include interconnected cultural and natural resources that continue to sustain the well-being and survival of Indigenous peoples.

**The Tribal Council of the Fort Yuma Quechan Indian Tribe** released a statement saying: “The protection of the Chuckwalla National Monument brings the Quechan people an overwhelming sense of peace and joy. This national monument designation cements into history our solidarity and collective vision for our peoples. The essence of who we are lies in the landscapes of Chuckwalla and Avi Kwa Ame. Every trail, every living being, and every story in these places is connected to a rich history and heritage that runs in our DNA. That is why we look forward to the day when we can celebrate adding the proposed Kw’tsán National Monument for protection as well.”

Tribal leaders are also calling on President Biden to designate one more national monument in California before the end of his term: the proposed Kw’tsán National Monument in Southern California.

“The Colorado River Indian Tribes (CRIT) celebrates the permanent and long-term protection of ancestral lands and the cultural landscape through the designation of the Chuckwalla National Monument,” said **Amelia Flores, Chairwoman of the Colorado River Indian Tribes**. “CRIT has worked tirelessly to preserve and protect water, resources, and sacred sites. This designation clearly affirms CRIT’s spiritual, cultural, and ancestral connection to these lands.”

The designation will provide protection to Indigenous trail systems, sacred sites and objects, important plants and wildlife, and more.

“The Cahuilla Band of Indians strongly applauds the creation of the Chuckwalla National Monument,” said **Erica Schenk, Chairwoman of the Cahuilla Band of Indians**. “The area includes village sites, camps, quarries, food processing sites, power places, trails, glyphs, and story and song locations, all of which are evidence of the Cahuilla peoples’ and other Tribes’ close and spiritual relationship to these desert lands.”

Local businesses, chambers of commerce, and elected officials are also celebrating the announcement as great news for the local economy and quality of life.

“Chuckwalla National Monument will help provide access to nature, protect places for outdoor recreation, boost our economy, and benefit businesses,” said **Waymond Fermon, Indio City Councilmember**. “In under an hour’s drive, residents of my community of Indio can experience the beauty of the monument and explore nature close to home. National monument status ensures that places beloved for outdoor recreation are here for current and future generations to enjoy.”

Some popular trails and places of interest that will be protected as part of the monument include Painted Canyon and Box Canyon in the Mecca Hills area, Corn Springs Campground, and the Bradshaw Trail. The area is popular for recreational activities like hiking, camping, and OHV use on authorized routes. Under a national monument, all of these uses will continue to be allowed, and the natural resources these uses depend on would be better protected.

“I am thrilled to celebrate the new Chuckwalla National Monument,” said **Evan Trubee, Owner of Big Wheel Tours and Palm Desert City Councilmember**. “Protecting public lands here in the Coachella Valley will preserve the wildlife and beautiful landscapes that make our desert home unique. It will help ensure access to the outdoors for our local communities and protect the nature that draws visitors to Riverside and Imperial Counties.”

The monument is complementary to the goals of the Desert Renewable Energy Conservation Plan (DRECP), which identified areas suitable for renewable energy development as well as lands that should be safeguarded for their biological, cultural, recreation, and other values. The DRECP identified many of the lands in the monument as being important to conserve for their biological values. Permanently protecting these lands helps ensure a balanced approach to the development of renewable energy and conservation in the California Desert.

“Chuckwalla National Monument is a testament to the reality that conservation and clean energy progress go hand in hand,” said **Raisa Lee, Sr. Director of Development, Clearway Energy Group**. “We are grateful to Senator Padilla and Representative Ruiz for their tireless and collaborative work to protect biological and cultural areas while helping meet the nation’s growing demand for reliable, low-cost energy.”

The new monument also helps preserve the California Desert’s military history by protecting World War II training sites. Moreover, protecting public lands in the Desert helps provide a buffer for present-day military installations from development that may interfere with military airspace.

“A major part of my transition back to civilian life and healing has been time spent with nature,” said **Craig Meling, former U.S. Army Major who lives in the Coachella Valley**. “The new Chuckwalla National Monument preserves the important military history of the area and can also serve

as a place of respite for those healing from the trauma of war.”

Championed by Senator Alex Padilla and Representative Raul Ruiz, M.D., the effort to designate Chuckwalla National Monument garnered overwhelming local support. The Torres Martinez Desert Cahuilla Indians, the Fort Yuma Quechan Indian Tribe, the Cahuilla Band of Indians, the Chemehuevi Indian Tribe, the Colorado River Indian Tribes, the Morongo Band of Mission Indians, and the Twenty-Nine Palms Band of Mission Indians all called for the establishment of the monument.

Local elected officials, the cities of Banning, Cathedral City, Desert Hot Springs, Indian Wells, Indio, La Quinta, Palm Desert, and Palm Springs, over 300 businesses, business organizations, and Chambers of Commerce, 370 scientists, and residents of the eastern Coachella Valley and neighboring areas also added their voices in support.

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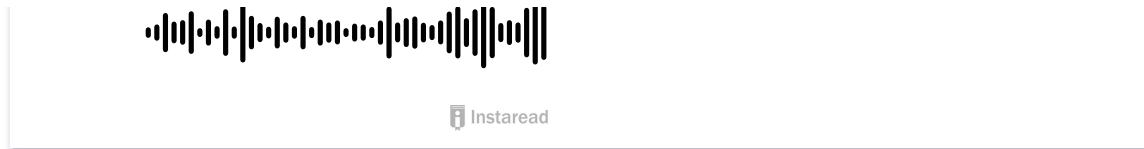
## White House says it will eliminate national monuments — then scrubs the announcement

BY RACHEL FRAZIN - 03/17/25 11:22 AM ET

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The White House said Friday night that it would eliminate protections from millions of acres declared by former President Biden as national monuments — but later scrubbed that language from its fact sheet.

In a fact sheet on an executive order issued late Friday, the Trump administration said it was “terminating proclamations declaring nearly a million acres constitute new national monuments that lock up vast amounts of land from economic development and energy production.”

However, the executive order described by the fact sheet did not contain references to national monuments. By Monday, the language no longer appeared in the fact sheet.

Nevertheless, the White House told The Washington Post that it planned to eliminate two national monuments in California that were established by Biden at the end of his tenure.

These monuments are the Chuckwalla National Monument and the S  ttila Highlands National Monument, which protect a combined 848,000 acres of particular significance to Native tribes in the region.



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On Monday, spokespeople for the White House and the Interior Department declined to comment.

**TAGS** JOE BIDEN

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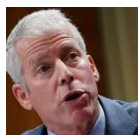
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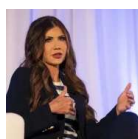
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*The* WHITE HOUSE

FACT SHEETS

Fact Sheet: President Donald J. Trump Rescinds Additional Harmful Biden Executive Actions

The White House

March 14, 2025

**RESTORING COMMON SENSE AND GOOD GOVERNANCE:** Today, President Donald J. Trump signed an Executive Order rescinding a second round of harmful executive actions issued by the prior administration, continuing his efforts to reverse damaging policies and restore effective government.

- This Executive Order rescinds 19 executive actions signed by President Biden.
  - This is in addition to the nearly 80 executive actions President Trump rescinded on Day One.
  - In just two months, President Trump has rescinded more executive actions than the total number of executive orders President Biden signed in his entire first year.
- These rescissions are necessary to end radical ideology, eliminate wasteful regulations, and prioritize the interests of American citizens.
- President Trump is committed to continuing the review and repeal of harmful Biden administration policies to usher in a new golden age for America.

**REVERSING BIDEN'S FAILED POLICIES:** President Trump's latest action targets some of Biden's most damaging executive orders and policies, including:

- Rescinding Biden's executive action that elevated radical gender ideology in U.S. diplomacy and foreign aid.
- Eliminating Biden's use of the Defense Production Act to push his Green New Scam, including mandates for electric heat pumps and solar panels.

- Terminating proclamations declaring nearly a million acres constitute new national monuments that lock up vast amounts of land from economic development and energy production.
- Repealing Biden's executive order forcing radical labor policies and apprenticeship mandates onto American businesses and government agencies.
- Removing Biden's directive to prioritize union-driven policies that imposed unnecessary regulations on industries.
- Revoking Biden executive order that funneled Federal resources into radical biotech and biomanufacturing initiatives under the guise of environmental policy.

**PRESIDENT TRUMP IS DELIVERING ON HIS PROMISES:** With today's Executive Order, President Trump continues delivering on his promise to reverse the disastrous policies of the previous administration and put America back on a path to prosperity, security, and strength.

President Trump: "I can undo almost everything Biden did, he through executive order. And on day one, much of that will be undone."

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JANUARY 16, 2025

## WHAT THEY ARE SAYING: President Biden Builds on Historic Conservation Legacy, Establishes Chuckwalla and Sáttítla Highlands National Monuments in California

Adding to his legacy of conserving more lands and waters than any President in history, two days ago President Biden signed proclamations creating the Chuckwalla National Monument and the Sáttítla Highlands National Monument in California. These two monuments together conserve 848,000 acres of lands in California and will protect clean water for communities, honor areas of cultural significance to Tribal Nations and Indigenous peoples, and enhance access to nature.

Establishing the Chuckwalla National Monument is President Biden’s capstone action to create the largest corridor of protected lands in the continental United States, covering nearly 18 million acres stretching approximately 600 miles. The Moab to Mojave Conservation Corridor stretches from Bears Ears National Monument and Grand Staircase-Escalante National Monument in southwestern Utah, to which President Biden restored protections in 2021; through Baaj Nwaavjo I’tah Kukveni – Ancestral Footprints of the Grand Canyon National Monument in Arizona and Avi Kwa Ame National Monument in Nevada, both established by President Biden in 2023; and reaches the deserts and mountains of southern California that are being protected with the designation of the Chuckwalla National Monument.

President Biden and Vice President Harris’s record-setting environmental legacy includes conserving more lands and waters, deploying more clean energy, and making more progress in cutting climate pollution and advancing environmental justice than any previous administration. Following last

week's actions to protect the East and West coasts and the Northern Bering Sea from offshore oil and natural gas drilling, President Biden has now protected 674 million acres of U.S. lands and waters.

Leaders from California and across the country applauded the announcement:

*Elected Officials*

**Governor Gavin Newsom (D-CA)**

“California is now home to two new national monuments that honor the tribes that have stewarded these lands since time immemorial. Thanks to President Biden and the leadership of California tribes and local communities, we’re protecting 840,000 acres of some of our state’s most culturally significant lands. This is a huge boost for our efforts to protect 30% of California’s lands and coastal waters.” [[Statement](#), 1/7/2025]

**Senator Alex Padilla (D-CA)**

“Establishing the Chuckwalla National Monument is another major victory for safeguarding California’s public lands for generations to come. This historic announcement accelerates our state’s crucial efforts to fight the climate crisis, protect our iconic wildlife, preserve sacred tribal sites, and promote clean energy, while expanding equitable access to nature for millions of Californians. This designation reflects years of tireless work from tribal leaders to protect these sacred desert landscapes. President Biden has joined California leaders in championing our treasured natural wonders, and I applaud him for further cementing his strong public lands legacy.” [[Statement](#), 1/7/2025]

**Senator Adam Schiff (D-CA)**

“Designating Chuckwalla National Monument is a victory for conservation, climate resilience, and expanded access to nature. I am glad these lands will now be protected for generations to come.” [[Statement](#), 1/7/2025]

**Congressman Raul Ruiz (D-CA-25)**

“I am thrilled that President Biden has designated the Chuckwalla National Monument using the Antiquities Act. After years of negotiation and bringing several communities together, this achievement was made possible through the leadership and partnership of many organizations, tribes, and community leaders. Chuckwalla National Monument will pave the way for the future of conservation and renewable energy. I greatly appreciate Senators Padilla and Butler for their support and partnership over the last several years.”

[[Statement](#), 1/07/2025]

**Congressman Jared Huffman (D-CA-2)**

“Designation of the Chuckwalla and Sáttítla Highlands National Monuments is yet another win for Indigenous and community conservation efforts championed by the Biden-Harris administration,” said Ranking Member Huffman. “The new Chuckwalla National Monument will protect sacred and ecologically invaluable lands that have been home to the Cahuilla, Chemehuevi, Mojave, Quechan, and Serrano peoples since time immemorial. Likewise, Sáttítla, also known as the Medicine Lake Highlands, has been a spiritual center for the Pit River and Modoc Tribes for millennia. I’m grateful to the community leaders and elected officials that listened to Indigenous communities and worked tirelessly to protect these lands so that the ancestral homelands, cultural resources and traditions, and sacred sites of the region are protected for generations to come.” [[Statement](#), 1/7/2025]

**James Ramos, Assembly Member, Serrano/Cahuilla Tribe and Chair of the California Legislative Native American Caucus**

“The California Legislature expressed strong bipartisan support for establishing Chuckwalla and Sáttítla National Monuments by passing Senate Joint Resolutions (SJRs) 16 and 17 last year. These new monuments include lands long-valued and cherished by California’s First Peoples for their cultural and sacred significance. I am glad to see these irreplaceable natural and cultural treasures join our nation’s network of national monuments.” [[Statement](#), 1/7/2025]

**Casey Glaubman, Councilmember, Mt. Shasta City and Executive Director, Friends of the Mount Shasta Avalanche Center**

“As an avid explorer, runner, and lover of the outdoors, I couldn’t be more excited about the designation of Sáttítla National Monument. This new designation will ensure that these treasured public lands will endure for future generations.” [[Statement](#), 1/7/2025]

**Waymond Fermon, Councilmember, Indio City**

“Chuckwalla National Monument will help provide access to nature, protect places for outdoor recreation, boost our economy, and benefit businesses. In under an hour’s drive, residents of my community of Indio can experience the beauty of the monument and explore nature close to home. National monument status ensures that places beloved for outdoor recreation are here for current and future generations to enjoy.” [[Statement](#), 1/7/2025]

**Evan Trubee, Owner, Big Wheel Tours and Councilmember, Palm Desert City**

“I am thrilled to celebrate the new Chuckwalla National Monument. Protecting public lands here in the Coachella Valley will preserve the wildlife and beautiful landscapes that make our desert home unique. It will help ensure access to the outdoors for our local communities and protect the nature that draws visitors to Riverside and Imperial Counties.” [[Statement](#), 1/7/2025]

**Tribal Nations**

**Statement from the Tribal Council of the Fort Yuma Quechan Indian Tribe**

“The protection of the Chuckwalla National Monument brings the Quechan people an overwhelming sense of peace and joy. Tribes being reunited as stewards of this landscape is only the beginning of much-needed healing and restoration, and we are eager to fully rebuild our relationship to this place. This action is part of a greater movement around the country to reconnect Tribes to their ancestral homelands whilst ensuring they have the authority to guide management decisions with federal and state agencies. We, along with our sister Tribes, are dedicated to taking our spirit back, culture back, language back, and land back. This national monument designation cements into history our solidarity and collective vision for our peoples. While we

celebrate, we also hold the truth that there is still much work to do to fully re-immense ourselves as stewards within this ecosystem. The essence of who we are lies in the landscapes of Chuckwalla and Avi Kwa Ame. Every trail, every living being, and every story in these places is connected to a rich history and heritage that runs in our DNA. That is why we look forward to the day when we can celebrate adding the proposed Kw'tsán National Monument for protection, as well. Our Tribe believes that this effort is proof that Together We Progress. We extend a hand of immense gratitude to the Biden Administration, to our allies, partners, and communities that showed up to protect the Chuckwalla region. We thank you on behalf of the generations of today and for all our relations that will look after this land in the future.” [Statement, 1/7/2025]

**Yatch Bamford, Chairman, Pit River Nation**

“For generations, my people have fought to protect Sáttítla, and today we celebrate the voices of our Ancestors being heard. Sáttítla Highlands National Monument is a victory not just for Tribal Nations but for every American who understands the value of clean water, healthy lands, and preserving the true history of these United States of America. These designations demonstrate what is possible when we center Indigenous leadership and honor the deep connections between Tribes and their homelands. We thank President Biden for listening to the many diverse voices that called for this designation and for standing in solidarity with the Pit River Nation.” [Statement, 1/7/2025]

**Erica Schenk, Chairwoman of the Cahuilla Band of Indians**

“The Cahuilla Band of Indians strongly applauds the creation of the Chuckwalla National Monument. The area includes village sites, camps, quarries, food processing sites, power places, trails, glyphs, and story and song locations, all of which are evidence of the Cahuilla peoples’ and other Tribes’ close and spiritual relationship to these desert lands.” [Statement, 1/7/2025]

**Darrell Mike, Chairman, Twenty-Nine Palms Band of Mission Indians**

“Our histories, stories, trails, songs, and traditional knowledge are alive in these lands. The animals, plants, insects, canyons, mountains, and other



natural features in this region are foundational components to our cultural identity and existence as Tribal people. To us, cultural and natural resources are inseparable. They connect us to our ancestors and sustain our livelihoods and traditional practices today. The biodiversity and cultural resources present in this proposed monument are worthy of robust and proper protections.” [\[Statement, 1/7/2025\]](#)

**Robert Burkybile, Chief, Modoc Nation**

“Modoc Nation shared the sacred landscapes of the Medicine Lake Highlands with the Pit River Tribe. Our Pit River neighbors refer to this land as Sáttítla; it seems the traditional Modoc word for this land may have been lost following the attempted extermination and eventual forced removal of the Modoc people from our lands. Modoc Nation celebrates the designation of our shared sacred land as a national monument, and looks forward to participating in a new land management planning process.” [\[Statement, 1/7/2025\]](#)

**Brandy McDaniels, Sáttítla National Monument Lead, Pit River Nation**

“We could not be more excited that federal leaders are hearing our call to protect these sacred lands. There has been overwhelming support for this monument, as demonstrated at the USDA’s listening session recently. We have many diverse voices that are passionate about protecting what makes this region unique and following decades of defending our ancestral homelands, the Pit River Nation welcomes the news that our voices and the voices of our Ancestors are finally being heard.” [\[Statement, 1/7/2025\]](#)

**Joseph DL Mirelez, Chairman, Torres Martinez Desert Cahuilla Indians**

“For thousands of years, the Torres Martinez Desert Cahuilla Indians have called the lands in the Chuckwalla National Monument home. We are happy to see the designation protect this area that contains thousands of cultural places and objects of vital importance to the history and identity of the Torres Martinez Desert Cahuilla Indians.” [\[Statement, 1/7/2025\]](#)

**Amelia Flores, Chairwoman, Colorado River Indian Tribes**

“The Colorado River Indian Tribes (CRIT) celebrates the permanent and long-term protection of ancestral lands and the cultural landscape through

the designation of the Chuckwalla National Monument. CRIT has worked tirelessly to preserve and protect water, resources, and sacred sites. This designation clearly affirms CRIT's spiritual, cultural, and ancestral connection to these lands." [Statement, 1/7/2025]

**Jack Potter, Chairman, Redding Rancheria**

"Redding Rancheria celebrates the designation of the Sáttítla Highlands National Monument, and supports all Tribes working to protect their lands. Tribes revere our lands as historic places of learning and sacred practice. Just as other American cultures might seek to protect a historic church or university, tribal communities wish to preserve our culture by protecting the sacred land where we learn, heal, gather medicine, and honor The Creator. We thank President Biden for honoring and protecting our sacred space for generations to come." [Statement, 1/7/2025]

**Michael Madrigal (Cahuilla), Board President, Native American Land Conservancy**

"The Native American Land Conservancy celebrates the creation of Chuckwalla National Monument. We are grateful to the many Tribal Nations that engaged in the effort and called for the preservation and stewardship of this cultural landscape. It is heartening to see more Tribal communities involved in public land issues in recent years. Indigenous people must be heard and actively involved in all spaces that discuss the management of our homelands. We will continue to support Tribal communities and their many efforts to preserve cultural, natural, and spiritual values which are the foundations of our existence." [Statement, 1/7/2025]

*Conservation and Climate Leaders*

**Gene Karpinski, President, League of Conservation Voters**

"LCV is forever grateful for President Biden and Secretary Haaland's steadfast leadership and commitment to protecting our communities, climate, and sacred and treasured places. We are thrilled to celebrate today's designations of the Chuckwalla and Sáttítla Highlands National Monuments, and proud to support the Tribal and local leaders who advocated tirelessly to make them happen. These monuments protect and honor living landscapes

that are rich in cultural, recreational, and ecological resources that continue to sustain the well-being and survival of Indigenous peoples today. S  tt  tla Highlands National Monument offers protections for a unique volcanic landscape which is home to critical water resources for millions of people, as well as agriculture and fish populations, and Chuckwalla National Monument provides a poignant example of how clean energy and conservation practices can coexist to simultaneously tackle the climate crisis and build climate resilience.” [Statement, 1/7/2025]

**Ben Jealous, Executive Director, Sierra Club**

“Our public lands tell the history of America. They must be protected for us to learn from, and to be enjoyed and explored, for this generation and those to come. Throughout his time in office, President Biden has not only recognized that, he has acted with urgency. Today, the Sierra Club celebrates President Biden’s bold actions to, once again, protect and preserve America’s natural and cultural resources. From the ecologically rich Chuckwalla deserts in the south to the primordial network of S  tt  tla aquifers in the north to the fragile habitats and ecosystems of the southwest, communities and wildlife will continue to benefit from the clean water, protected landscapes and more equitable access to nature these monuments preserve. For years, Tribes and Indigenous voices have called for these landscapes to be protected. As he has throughout his presidency, President Biden answered those calls. Each new national monument adds a chapter to the story our public lands tell. We must continue the work to expand that story, protect the lands and waters that make this country special and preserve the historical, cultural and spiritual connections the original stewards of these landscapes continue to have with these places.” [Statement, 1/7/2025]

**Dr. Elizabeth Gray, CEO, National Audubon Society**

“We are grateful that the administration has heeded the call of thousands of Californians to protect our fragile deserts. This historic designation of the Chuckwalla National Monument not only ensures the preservation of the area’s rich biodiversity but also provides a critical sanctuary in addressing the climate crisis and supports the livelihoods of underserved communities. The expansion of protected areas underscores our commitment to collaborative habitat conservation, emphasizing partnerships with Indigenous peoples and local communities. We deeply appreciate the

dedication of the administration and California's congressional leadership in conserving these irreplaceable lands." [Statement, 1/7/2025]

**Nicole Gentile, Senior Director of Conservation, Center for American Progress**

"These designations honor the culture, history, and conservation efforts of numerous Tribes while safeguarding culturally and environmentally rich landscapes from the threat of large-scale development. Chuckwalla National Monument protects some of the most connected, diverse, and rare ecosystems in the West. At the same time, the new monument broadens access to nature for people across southwestern California. President Biden committed to protecting nature and prioritizing environmental justice, and these designations help him do just that. With just a few weeks left in his term, designating these monuments helps to solidify his legacy as one of the country's greatest conservation presidents." [Statement, 1/7/2025]

**Theresa Pierno, President and CEO, National Parks Conservation Association**

"Chuckwalla National Monument is a cornerstone in a vast network of protected landscapes across the Southwest. Stretching from Joshua Tree to the Grand Canyon to Bears Ears, this corridor forms the largest swath of protected lands in the continental U.S. This designation protects an extraordinary stretch of the California desert, preserving a landscape shaped by millennia for those who find inspiration in the timeless beauty of our national parks. This 18-million-acre corridor links the Mojave Desert to the Colorado Plateau, providing safe migration routes for wildlife like the iconic desert bighorn sheep and ensuring clean water flows through the Colorado River and its tributaries. It protects sacred sites central to Tribal nations for countless generations, and welcomes millions of visitors each year, inspiring exploration and bringing lasting economic strength to surrounding communities. NPCA has been proud to work locally and nationally for decades to preserve the extraordinary landscapes in the California desert and beyond." [Statement, 1/7/2025]

**David Seabrook, Interim President, The Wilderness Society**

“The significance of the dual designations of S  tt  la Highlands and Chuckwalla National Monuments in California is as enormous as the state itself—from the cool, northern headwaters of Medicine Lake Highlands to the Joshua Tree desert refuge in the south. These connected landscapes are crucial for both human and wildlife communities alike. We applaud President Biden for taking meaningful action to safeguard these culturally and ecologically unique regions and for listening to Tribal and local community members who have called for their protection so that their connections to this land last for future generations.” [\[Statement, 1/7/2025\]](#)

**Raisa Lee, Senior Director of Development, Clearway Energy Group**

“Chuckwalla National Monument is a testament to the reality that conservation and clean energy progress go hand in hand. We are grateful to Senator Padilla and Representative Ruiz for their tireless and collaborative work to protect biological and cultural areas while helping meet the nation’s growing demand for reliable, low-cost energy.” [\[Statement, 1/7/2025\]](#)

**Adam Cramer, CEO, Outdoor Alliance**

“Outdoor Alliance is thrilled to see the designation of Chuckwalla National Monument and S  tt  la National Monument. Today’s designations expand protections for some of California’s most popular outdoor landscapes. We are grateful for the work of Senator Padilla, Senator Butler, Representative Ruiz, and Governor Newsom, and are especially grateful to the Biden administration for their commitment to conservation and communities.” [\[Statement, 1/7/2025\]](#)

**Katie Goodwin, Western Regional Director, Access Fund**

“Access Fund appreciates the work and commitment of Tribal leaders, Senator Padilla, Senator Butler, Representative Ruiz, and Governor Newsom, to protect the unique landscapes of the Chuckwalla National Monument and the S  tt  la National Monument. These monuments will safeguard sacred, cultural, and historic sites and protect critical habitat and biodiversity. The monument will ensure these lands remain accessible, enjoyable, and protected for current and future generations.” [\[Statement, 1/7/2025\]](#)

**Steve Messer, President, California Mountain Biking Coalition**

“We appreciate the tireless efforts of the advocates and tribal leaders who have worked to protect special places like Chuckwalla, and thank Senator Padilla, Congressman Ruiz, and the Biden Administration for taking action. We also appreciate the Pit River Tribe’s advocacy for Sáttítla National Monument in the Medicine Lakes area in far Northern California. These designations not only support California’s 30×30 conservation goals but can also support local economies, enhance opportunities for recreation, and ensure these lands remain accessible, enjoyable, and protected for future generations. They also respect tribal sovereignty, and will ensure the continued cultural stewardship practices by the original stewards of these lands.” [[Statement](#), 1/7/2025]

**Megan Fiske, California Stewardship Manager, Winter Wildlands Alliance**

“Winter Wildlands Alliance is grateful to see another successful effort to preserve and protect lands in California with the adoption of the Chuckwalla National Monument and the Sáttítla National Monument. We extend our gratitude to Senator Padilla and Senator Butler, Representative Ruiz, Governor Newsom and the Biden administration for supporting these critical efforts, moving us closer to our 30×30 goals. Protecting the unique landscapes throughout California, from the mountains to the desert, is crucial to preserving biodiversity and providing equitable access to our public lands.” [[Statement](#), 1/7/2025]

**Jennifer Savage, California Policy Associate Director, Surfrider Foundation**

“The dedication of the Chuckwalla National Monument and Sáttítla National Monument demonstrates a much needed commitment to preserving healthy ecosystems and safeguarding natural spaces from the mountains to the sea. We commend Senator Padilla, Senator Butler, Representative Ruiz, Governor Newsom, and the Biden Administration for their leadership in making this designation a reality.” [[Statement](#), 1/7/2025]

**Theresa L. Lorejo-Simsiman, California Stewardship Director, American Whitewater**



“American Whitewater is thrilled to see the designation of both the Chuckwalla National Monument and S  tt  tla National Monument in California. We are grateful for the leadership and commitment of Senator Padilla and former Senator Butler, Representative Ruiz, Governor Newsom and the Biden administration to conserve these natural landscapes for future generations.” [Statement, 1/7/2025]

**Dr. Carrie Besnette Hauser, President and CEO, Trust for Public Land**

“The designation of the Chuckwalla and S  tt  tla National Monuments in California marks an historic step toward protecting lands of profound cultural, ecological, and historical significance for all Americans. These monuments honor the enduring stewardship of Tribal Nations and the tireless efforts of local communities and conservation advocates who fought to safeguard these irreplaceable landscapes for future generations.” [Statement, 1/7/2025]

**Jennifer Rokala, Executive Director, Center for Western Priorities**

“With these proclamations, President Biden has secured his legacy as one of America’s great conservation presidents. It’s not enough to protect iconic landmarks and features—we must preserve the linkages between ecosystems and landscapes that support wildlife, clean air, and water that communities depend on. We thank President Biden for taking another big step toward achieving the national goal of protecting 30 percent of America’s lands and waters, and for honoring and respecting Indigenous peoples’ advocacy and heritage.” [Statement, 1/7/2025]

**Eric Hanson, Chair, Backcountry Hunters and Anglers California Chapter**

“As hunters and anglers, we understand the vital importance of conserving intact ecosystems for wildlife, habitat, and for future generations. BHA has long advocated for large-landscape conservation measures where hunters have a seat at the table, so we applaud President Biden’s decision to establish a national monument where our North American hunting traditions can endure and where BHA and partner organizations can continue to roll up our sleeves to improve wildlife habitat on the ground.” [Statement, 1/7/2025]

**Janessa Goldbeck, USMC Veteran and CEO, Vet Voice Foundation**

“The Chuckwalla National Monument simply wouldn’t exist without the leadership of Congressman Raul Ruiz. We’re honored to have joined forces with Tribes, community leaders, outdoor enthusiasts, fellow veterans, and Congressman Ruiz’s dedicated team to make this designation a reality under President Biden. This milestone is a lasting victory for all—veterans, non-veterans, and future generations.” [\[Statement, 1/7/2025\]](#)

**Jamie Asbury, General Manager, Imperial Irrigation District (IID)**

“IID was one of the early supporters of legislation by Congressman Ruiz to designate the Chuckwalla National Monument for its importance to the region. We applaud the announcement made today by President Biden to make this designation official.” [\[Statement, 1/7/2025\]](#)

**Linda Castro, Assistant Policy Director, CalWild**

“CalWild is extremely pleased that the Biden administration has heeded the call of six Tribal nations, hundreds of local small businesses, elected officials, historical societies, veterans, clergy, and other diverse interests to designate the Chuckwalla National Monument. After more than five years of work we are delighted to join these constituencies in thanking President Biden for protecting California’s desert public lands for us and for future generations to visit and enjoy.” [\[Statement, 1/7/2025\]](#)

**Dr. Jun Bando, Executive Director, California Native Plant Society**

“The California Native Plant Society is thrilled and grateful to see these national monument designations, which have received overwhelming community support, give rare plant species a fighting chance for survival, and honor knowledges held by the land’s original stewards since time immemorial. California faces the highest risks for species extinction in the nation, and habitat loss is the leading cause. Protecting intact habitat, like Chuckwalla and Sáttítla, is essential to stopping the extinction crisis and avoiding the worst impacts of climate change.” [\[Statement, 1/7/2025\]](#)

**Lisa Belenky, Senior Counsel, Center for Biological Diversity**



“I’m grateful the president designated these two national monuments, protecting rare wildlife, stunning landscapes and sacred lands in California for future generations. Chuckwalla National Monument includes lands sacred to native peoples and it’s home to wildlife the Center has worked to protect for decades, including bighorn sheep, desert tortoises, desert kit foxes and the monument’s namesake Chuckwalla lizards. The Sáttítla National Monument is a stunning landscape sacred to the Pit River Tribe that provides habitat for Pacific fishers and northern spotted owls. Protecting these lands also safeguards aquifers providing clean water to millions of people.” [Statement, 1/8/2024]

**Phil Francis, Chair, Executive Council Coalition to Protect America’s National Parks**

“We celebrate the designations of the Chuckwalla National Monument and the Sáttítla Highlands National Monument. The efforts to protect these landscapes were led by Tribes and broadly supported by elected officials, businesses, local community members, and outdoor enthusiasts. The Chuckwalla National Monument will safeguard hundreds of thousands of acres of desert land that serves as a habitat for an incredible amount of biodiversity, protect numerous historic sites and resources, and preserve a landscape that is culturally significant for many Tribes. The Sáttítla Highlands National Monument will help to protect lands that are critical to the protection of water and wildlife and sacred for the Pit River and Modoc Nations, as well as for surrounding Tribal Peoples. We thank President Biden for taking action to protect these lands for future generations.” [Statement, 1/14/2025]

**Chris Hill, Chief Executive Officer, Conservation Lands Foundation**

“President Joe Biden’s use of the Antiquities Act to protect Chuckwalla and Sáttítla Highlands National Monuments is the culmination of years of strong Tribal leadership, bipartisan collaboration and heartfelt advocacy from local communities, businesses and elected officials. Today’s action honors Indigenous cultural connections, conserves vital habitats, expands outdoor access, and strengthens local economies.” [Statement, 1/14/2025]

**Laura Deehan, California State Director, Environment America**

“These designations mean a brighter and safer future for California’s wildlife and public lands. Thanks to Tribal leaders, local coalitions and our state and Congressional champs, our state has made a huge stride today toward safeguarding more nature. The Chuckwalla and Sáttítla National Monuments are two of the most stunning and ecologically crucial regions in our state. The Chuckwalla National Monument is a perfect example of reconnecting nature. The region hosts one of the greatest densities of desert tortoises in the world and connecting their habitats will give these threatened tortoises better opportunities to survive and thrive. The forests and clear waters of the Sáttítla monument area will be a safe home for generations of bears, birds and fish; and the communities of northern California will have clean water for decades into the future. We are thrilled that President Biden, Secretary Deb Haaland, Secretary Tom Vilsack and other decision-makers recognized these stunning wildlife habitats and natural landscapes should be safeguarded.” [[Statement](#), 1/7/2025]

**LD Delano, Board Chair, Great Old Broads for Wilderness**

“Great Old Broads for Wilderness joins with the many conservation organizations, Tribal groups, and residents across the state of California in celebrating today’s designation of Chuckwalla National Monument and Sáttítla National Monument. Chuckwalla National Monument in Southern California preserves the cultural heritage sites of five Indigenous tribes, supports a critical desert ecosystem, and provides recreation opportunities for historically underrepresented communities. Northern California’s Sáttítla National Monument preserves and protects the ancestral homeland of the Pit River Tribe—and one of the most important sources of clean, cool groundwater for people and wildlife in the region—from potential development. We thank President Biden for using his authority under the Antiquities Act to preserve these special landscapes for future generations, and for his administration’s commitment over the past four years to the conservation of our wild public lands.” [[Statement](#), 1/7/2025]

**Maite Arce, President and CEO, Hispanic Access Foundation**

“The designations of Chuckwalla National Monument and Sáttítla National Monument reflect the power of collaborative advocacy and the importance of protecting landscapes that hold profound cultural, ecological, and recreational significance. These designations honor the leadership of Tribal

nations, and broad support from a coalition of advocates, including Latino communities who have long championed safeguarding these lands.”

[[Statement](#), 1/7/2025]

**Anna Peterson, Executive Director, The Mountain Pact**

“Public lands lie at the heart of our communities, and we are thrilled that President Biden has provided permanent protections for two of the West’s most priceless landscapes. Permanently protecting these sacred lands will not only honor long standing efforts to protect these lands from industrial development, but also ensures current and future generations can continue practicing time honored traditions on unspoiled lands. We thank President Biden for designating a Chuckwalla National Monument in the California desert. This new monument will protect important heritage values tied to the land such as multi-use trail systems established by Indigenous peoples, sacred sites and objects, traditional cultural places, geoglyphs, petroglyphs, pictographs, plants, and wildlife. Permanently protecting these lands will also help protect vast desert ecosystems and critical habitat for species like the chuckwalla lizard and desert tortoise, and migration corridors for desert bighorn sheep. We also thank the President for hearing the calls from the Pit River Tribe and designating a Sáttitla Highlands National Monument in Northern California. This culturally significant, geologically unique, and life-sustaining region is critical for the health of the Californians who rely on Sáttitla as a source of fresh drinking water, and for the Indigenous peoples who have called this land home since time immemorial. Public lands contribute to our local economies, shape our culture, and give our communities the opportunity to connect with nature. At a time when climate change is already threatening so many of the lands in California that sustain life and connect so many people to their cultural heritage, it is of utmost importance that we do everything in our power to protect the places that hold such ecological, biological, and cultural significance.” [[Statement](#), 1/14/2025]

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

<p>DANIEL TORONGO and BLUERIBBON COALITION, INC.,</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p>v.</p> <p>DOUGLAS BURGUM, in his official capacity as Secretary of the Interior; BUREAU OF LAND MANAGEMENT; and THE UNITED STATES DEPARTMENT OF THE INTERIOR,</p> <p style="text-align: center;"><i>Defendants.</i></p>	<p style="text-align: center;">Case No. 4:25-cv-11263</p> <p style="text-align: center;">Hon. F. Kay Behm</p> <p style="text-align: center;"><b>[PROPOSED] TRIBAL NATIONS’ ANSWER TO COMPLAINT</b></p>
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Tribal Nations the Chemehuevi Indian Tribe, the Colorado River Indian Tribes, the Morongo Band of Mission Indians, the Torres Martinez Desert Cahuilla Indians, and the Fort Yuma Quechan Indian Tribe (collectively, “Tribal Nations”) answer the Complaint as follows. Use of the Complaint’s numbered paragraphs in this Answer correspond to those set forth in the Complaint, and do not constitute an admission by Tribal Nations of their relevancy or accuracy.

## **GENERAL DENIAL**

Tribal Nations generally deny each and every allegation of the Complaint, with the exception of those allegations specifically admitted in this Answer, or that constitute an admission against the interest of the Plaintiffs. Tribal Nations' general denial extends to any assertion contained within the headers of the Complaint to the extent that it constitutes an affirmative allegation.

## **SPECIFIC DENIALS**

1. The allegations in Paragraph 1 constitute legal conclusions to which no response is required. Paragraph 1 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

2. The allegations in Paragraph 2 constitute legal conclusions to which no response is required. Paragraph 2 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

3. The allegations in Paragraph 3 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 3 is denied.

4. The allegation in Paragraph 4 is unduly vague and ambiguous and therefore no response is required. To the extent a response is required, Paragraph 4 is denied.

5. The allegations in Paragraph 5 constitute legal conclusions to which no response is required. Paragraph 5 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

6. The allegations in Paragraph 6 constitute legal conclusions to which no response is required. Paragraph 6 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

7. Paragraph 7 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is

required, any characterization of the document and any remaining allegations are denied.

8. The allegations in Paragraph 8 constitute legal conclusions to which no response is required. Paragraph 8 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

9. The allegations in Paragraph 9 constitute legal conclusions to which no response is required. Paragraph 9 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

10. The allegations in Paragraph 10 constitute legal conclusions to which no response is required. Paragraph 10 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.



11. The allegations in Paragraph 11 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 11 is denied.

12. The allegations in Paragraph 12 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 12 is denied.

13. The allegations in Paragraph 13 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 13 is denied.

14. The allegations in Paragraph 14 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 14 is denied.

15. Tribal Nations admit that on January 14, 2025, former President Joseph Biden issued a proclamation declaring Chuckwalla National Monument. Tribal Nations deny that Chuckwalla National Monument is 624,000 acres and assert that the acreage is approximately 624,270 acres.

16. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 16 and deny the same.



17. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 17 and deny the same.

18. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 18 and deny the same.

19. Tribal Nations are without knowledge or information to form a belief as to the truth of Paragraph 19 and deny the same.

20. The allegation in Paragraph 20 constitutes legal conclusions to which no response is required. To the extent a response is required, Paragraph 20 is denied.

21. The allegations in Paragraph 21 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 21 is denied.

22. The allegations in Paragraph 22 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 22 is denied. In so much as Paragraph 22 alleges Plaintiff Torongo's plans, Tribal Nations are without knowledge or information sufficient to form a belief as to its truth and deny the same.

23. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 23 and deny the same.

24. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 24 and deny the same.

25. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 25 and deny the same.

26. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 26 and deny the same.

27. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 27 and deny the same.

28. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 28 and deny the same.

29. Tribal Nations admit Paragraph 29.

30. Tribal Nations admit Paragraph 30.

31. Tribal Nations admit Paragraph 31.

32. The allegations in Paragraph 32 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 32 is denied.

33. The allegations in Paragraph 33 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 33 is denied.

34. The allegations in Paragraph 34 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 34 is denied.

35. Paragraph 35 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

36. The allegation in Paragraph 36 constitutes a legal conclusion to which no response is required. To the extent a response is required, Paragraph 36 is denied.

37. Paragraph 37 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

38. The allegations in Paragraph 38 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 38 is denied.

39. Tribal Nations admit the first sentence in Paragraph 39. The second sentence in Paragraph 39 references a document that speaks for itself,

and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

40. The allegations in Paragraph 40 constitute legal conclusions to which no response is required. Paragraph 40 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

41. The allegations in Paragraph 41 constitute legal conclusions to which no response is required. Paragraph 41 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

42. The allegation in Paragraph 42 constitutes a legal conclusion to which no response is required.

43. The allegations in Paragraph 43 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 43 is denied.

44. Paragraph 44 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

45. Paragraph 45 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

46. The allegations in Paragraph 46 constitute legal conclusions to which no response is required. Paragraph 46 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

47. The allegations in Paragraph 47 constitute legal conclusions to which no response is required. Paragraph 47 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

48. Paragraph 48 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

49. Paragraph 49 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

50. The allegations in Paragraph 50 constitute legal conclusions to which no response is required. Paragraph 50 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

51. Paragraph 51 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

52. The allegation in the first sentence of Paragraph 52 constitutes a legal conclusion to which no response is required. Paragraph 52 also

references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

53. The allegations in Paragraph 53 constitute legal conclusions to which no response is required. Paragraph 53 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

54. The allegations in Paragraph 54 constitute legal conclusions to which no response is required. Paragraph 54 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

55. The allegations in Paragraph 55 constitute legal conclusions to which no response is required. Paragraph 55 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

56. The allegations in Paragraph 56 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 56 is denied.

57. Tribal Nations admit the allegations regarding Devils Tower. The remainder of Paragraph 57 is unduly vague and ambiguous, and therefore no response is required. To the extent a response is required, the remainder of Paragraph 57 is denied.

58. The allegations in Paragraph 58 constitute legal conclusions to which no response is required. Paragraph 58 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

59. The allegation in Paragraph 59 is unduly vague and ambiguous and therefore no response is required. To the extent a response is required, Paragraph 59 is denied.

60. The allegations in Paragraph 61 constitute legal conclusions to which no response is required. Paragraph 61 also references a document that speaks for itself, and therefore does not require an answer. To the extent



any further response is required, any characterization of the document and any remaining allegations are denied.

61. Tribal Nations admit Paragraph 61.

62. Tribal Nations admit Paragraph 62.

63. Tribal Nations admit Paragraph 63.

64. The allegations in Paragraph 64 are unduly vague and ambiguous and therefore no response is required. To the extent a response is required, Paragraph 64 is denied.

65. Paragraph 65 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

66. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 66 and deny the same.

67. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 67 and deny the same.

68. The allegations in Paragraph 68 constitute legal conclusions to which no response is required. Paragraph 68 also references a document that speaks for itself, and therefore does not require an answer. To the extent

any further response is required, any characterization of the document and any remaining allegations are denied.

69. The allegations in Paragraph 69 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 69 is denied.

70. The allegations in Paragraph 70 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 70 is denied.

71. The allegations in Paragraph 71 constitute legal conclusions to which no response is required. Paragraph 71 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

72. The allegations in Paragraph 72 constitute legal conclusions to which no response is required. Paragraph 72 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

73. The allegation in the first sentence of Paragraph 73 is unduly vague and ambiguous, and therefore no response is required. To the extent a response is required, the first sentence of Paragraph 73 is denied. Tribal Nations admit the second sentence in Paragraph 73.

74. The allegations in Paragraph 74 constitute legal conclusions to which no response is required. Paragraph 74 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

75. The allegations in Paragraph 75 are unduly vague and ambiguous and therefore no response is required. Paragraph 75 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

76. The allegations in Paragraph 76 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 76 is denied.

77. The allegations in Paragraph 77 constitute a legal conclusion to which no response is required. Paragraph 77 also references a document

that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

78. The allegations in Paragraph 78 constitute legal conclusions to which no response is required. Paragraph 78 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

79. The allegations in Paragraph 79 constitute legal conclusions to which no response is required. Paragraph 79 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

80. The allegations in Paragraph 80 constitute legal conclusions to which no response is required. Paragraph 80 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

81. Paragraph 81 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

82. The allegations in Paragraph 82 constitute legal conclusions to which no response is required. Paragraph 82 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

83. The allegations in Paragraph 83 constitute legal conclusions to which no response is required. Paragraph 83 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

84. The allegations in Paragraph 84 constitute legal conclusions to which no response is required. Paragraph 84 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

85. The allegations in Paragraph 85 constitute legal conclusions to which no response is required. Paragraph 85 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

86. The allegations in Paragraph 86 constitute legal conclusions to which no response is required. Paragraph 86 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

87. The allegations in Paragraph 87 constitute legal conclusions to which no response is required. Paragraph 87 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

88. Paragraph 88 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

89. The allegation in Paragraph 89 constitutes a legal conclusion to which no response is required. Paragraph 89 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

90. The allegations in Paragraph 90 constitute legal conclusions to which no response is required. Paragraph 90 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

91. The allegations in Paragraph 91 constitute legal conclusions to which no response is required. Paragraph 91 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

92. Paragraph 92 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

93. Paragraph 93 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

94. The allegations in Paragraph 94 constitute legal conclusions to which no response is required. Paragraph 94 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

95. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 95 and deny the same.

96. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 96 and deny the same.

97. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 97 and deny the same.

98. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth Paragraph 98 and deny the same.

99. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 99 and deny the same.



100. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 100 and deny the same.

101. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 101 and deny the same.

102. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 102 and deny the same.

103. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 103 and deny the same.

104. The allegations in Paragraph 104 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 104 is denied.

105. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105 and deny the same. The allegations in Paragraph 105 also constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 105 is denied.

106. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106 and deny the same. The allegations in Paragraph 106 also constitute legal conclusions

to which no response is required. To the extent a response is required, Paragraph 106 is denied.

107. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 107 and deny the same.

108. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 108 and deny the same.

109. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 109 and deny the same. The allegation in Paragraph 109 also constitutes a legal conclusion to which no response is required. To the extent a response is required, Paragraph 109 is denied.

110. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 110 and deny the same.

111. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 111 and deny the same. The allegation in Paragraph 111 also constitutes a legal conclusion to which no response is required. To the extent a response is required, Paragraph 111 is denied.

112. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 112 and deny the same.

113. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 113 and deny the same.

114. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 114 and deny the same. The allegations in Paragraph 114 also constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 114 is denied.

115. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of the allegation in Paragraph 115 and deny the same. The allegation in Paragraph 115 also constitutes a legal conclusion to which no response is required. To the extent a response is required, Paragraph 115 is denied.

116. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116 and deny the same.

117. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117 and deny

the same. The allegations in Paragraph 117 also constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 117 is denied.

118. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 118 and deny the same.

119. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 119 and deny the same.

120. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of the first sentence of Paragraph 120 and deny the same. The second sentence of Paragraph 120 constitutes a legal conclusion to which no response is required. To the extent a response is required, the second sentence of Paragraph 120 is denied.

121. Tribal Nations are without knowledge or information sufficient to form a belief as to the truth of Paragraph 121. The allegations in Paragraph 121 also constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 121 is denied.

122. The allegations in Paragraph 122 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 122 is denied.

123. The allegations in Paragraph 123 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 123 is denied.

124. The allegations in Paragraph 124 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 124 is denied.

125. The allegations in Paragraph 125 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 125 is denied.

126. The allegations in Paragraph 126 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 126 is denied.

127. The allegations in Paragraph 127 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 127 is denied.

128. The allegations in Paragraph 128 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 128 is denied.

129. The allegations in Paragraph 129 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 129 is denied.

130. The allegations in Paragraph 130 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 130 is denied.

131. The allegations in Paragraph 131 constitute legal conclusions to which no response is required. Paragraph 131 also references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

132. Paragraph 132 references a document that speaks for itself, and therefore does not require an answer. To the extent any further response is required, any characterization of the document and any remaining allegations are denied.

133. The allegations in Paragraph 133 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 133 is denied.

134. The allegation in Paragraph 134 constitutes a legal conclusion to which no response is required. To the extent a response is required, Paragraph 134 is denied.

135. The allegations in Paragraph 135 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 135 is denied.

136. The allegations in Paragraph 136 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 136 is denied.

137. The allegations in Paragraph 137 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 137 is denied.

138. The allegations in Paragraph 138 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 138 is denied.

139. The allegations in Paragraph 139 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 139 is denied.

140. The allegations in Paragraph 140 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 140 is denied.

141. The allegations in Paragraph 141 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 141 is denied.

142. The allegations in Paragraph 142 constitute legal conclusions to which no response is required. To the extent a response is required, Paragraph 142 is denied.

### DEFENSES

1. Plaintiffs lack Article III standing.
2. The Court lacks subject matter jurisdiction.
3. Plaintiffs fail to state a claim upon which relief can be granted.
4. Venue is improper in this District.

Dated: August 11, 2025

Respectfully Submitted,

/s/ Leonard R. Powell

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the Morongo Band of Mission Indians,  
the Torres Martinez Desert Cahuilla  
Indians, and the Fort Yuma Quechan  
Indian Tribe*

### **CERTIFICATE OF SERVICE**

I certify that on August 11, 2015, I electronically filed the foregoing using the CM/ECF system, which will send notification of such filing to counsel of record. I further certify that I have mailed by United States Postal Service a bound Courtesy Copy to Judge F. Kay Behm.

Judge F. Kay Behm  
600 Church Street, Room 104  
Flint, MI 48502