

Archery Trade Association * Association of Fish and Wildlife Agencies * Boone and Crockett Club * Camp Fire Club of America * Congressional Sportsmen's Foundation * Council to Advance Hunting and the Shooting Sports * Dallas Safari Club * Delta Waterfowl Foundation * Houston Safari Club * Masters of Foxhounds Association * Mule Deer Foundation * National Association of Forest Service Retirees * National Rifle Association * National Shooting Sports Foundation * National Wild Turkey Federation * North American Bear Foundation * Orion: The Hunter's Institute * Quality Deer Management Association * Rocky Mountain Elk Foundation * Ruffed Grouse Society * Safari Club International * Tread Lightly! * Wildlife Management Institute * Wild Sheep Foundation * Whitetails Unlimited * U.S. Sportsmen's Alliance

May 11, 2015

Dear Representative Grijalva, Kirkpatrick & Gallego:

Our organizations, which represent millions of American hunter-conservationists are writing to express our concerns about your January 29th letter to President Obama encouraging use of the Antiquities Act to designate 1.7 million acres of lands around the Grand Canyon National Park as the Grand Canyon Watershed National Monument.

The land that would comprise the proposed monument includes some of the most important wildlife habitat, big game species and hunting opportunities in the U.S. including world class mule deer and elk. Not only is hunting an economic driver in the region, it also serves as a significant source of conservation revenue. In addition to license sales and excise taxes, this area generates revenue from the sale of special tags that have allowed the Arizona Game & Fish Department (AGFD) to partner with the U. S. Forest Service and the Bureau of Land Management to invest millions of dollars in habitat conservation and wildlife management in the region. We are deeply concerned that these outstanding economic and natural resource benefits will be significantly impaired by an Antiquities Act designation.

Proponents of the monument have cited a number of environmental challenges they inaccurately claim the designation could address. For example,

- Proponents have identified timber sales on the Kaibab National Forest as a threat to the areas' ecological integrity. In reality, wildfire, due to excessive fuel build up, is the greatest threat to Southwestern forests. Reducing fire risk mandates active management to eliminate the risk of catastrophic fires. The drought in the west is worsening, leaving our untreated forests extremely vulnerable in a potential catastrophic fire season. Wildfires have scorched more than 4 million acres in Arizona since 2000. Another catastrophic fire would put the state forests and the wildlife that reside in them at risk.
- Proponents have asserted that off-highway vehicles (OHV) are destroying the lands. In reality, cross-county OHV travel is already prohibited. OHV use is restricted to designated roads/routes and managed by BLM and USFS under their respective Travel Management Plans which provide an adaptive framework that can address future concerns and management needs.

- Proponents have asserted that an Antiquities Act designation will protect wildlife habitat connectivity. In reality, areas within the proposed monument are largely undeveloped; obstructions to wildlife movements are highly localized and typically associated with fences and roads. AGFD, the Arizona Department of Transportation, land management agencies, private landowners, and others are working to identify and remedy these barriers. There is no indication that a monument designation would expand or improve on those efforts.
- Proponents have asserted that overgrazing is harming these lands. In reality, livestock grazing within the proposed monument is responsibly and sustainably managed by the BLM and USFS. Stocking rates, seasons, and levels of use are specified by the management agency and adjusted to address resource needs and changing conditions. We feel that an Antiquities designation could be an unhelpful “solution in search of a problem” that would likely affect a system that is working well.

We have consulted with the AGFD and learned that their concerns about monuments designated using the Antiquities Act are rooted in past experience. For example, designation of the Sonoran Desert National Monument in 2001 has impaired recovery efforts for the Sonoran pronghorn while also restricting water development projects critical to the Sonoran desert bighorn sheep population. These adverse impacts on resident wildlife populations, coupled with knowledge of similar problems in Arizona and elsewhere, has resulted in the AGFD Commission voting to oppose the Grand Canyon Watershed Monument in 2012 and again in 2015.

In June, of 1906, President Theodore Roosevelt established the Grand Canyon Game Preserve which he believed should be: “set aside for the protection of game animals and be recognized as a breeding place therefore.” It would be ironic indeed if the conservation legacy of Theodore Roosevelt were to succumb to a legacy of non-management and hamstringing of critical conservation measures due to a misguided monument designation proclaimed without the benefit of local stakeholder input.

We would encourage you to honor both the wise legacy of President Roosevelt and the legacy of wildlife conservation by reconsidering your position supporting Administrative designation of the Grand Canyon Watershed National Monument without a thorough environmental evaluation and a thoughtful, transparent process including formal public involvement.

Thank you for your consideration of this matter.

Sincerely,

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