



April 13, 2015

The Honorable Doug Ducey  
Governor of Arizona

The Honorable Gary Herbert  
Governor of the State of Utah

The Honorable Orrin Hatch  
Senator - Utah

The Honorable Mike Lee  
Senator - Utah

The Honorable John McCain  
Senator - Arizona

The Honorable Jeff Flake  
Senator - Arizona

The Honorable Paul Gosar  
Representative - Arizona District 1

The Honorable Trent Franks  
Representative - Arizona District 4

The Honorable Jim Matheson  
Utah District 2

Mandy Metzger, Chair  
Coconino County Board of Supervisors

Gary Watson  
Mohave County Board of Supervisors

Lorraine Christian, Field Manager  
Strip District, Bureau of Land Management

Mike Williams, Forest Supervisor  
Kaibab National Forest

As concerned conservationists, we have received and reviewed the recent *Conserving the Grand Canyon Watershed A Proposal for National Monument Designation* prepared by the Center for Biological Diversity, the Grand Canyon Wildlands Council, and the Wilderness Society and we the organized conservation organizations listed below stand united in the opposition of this proposal. Within the above mentioned document, the proponents of this proposal attempt to justify designation of 1.7 million acres on the Arizona Strip as a National Monument but we believe much of their logic is fatally flawed. We will provide specific information about the management issues the proponents present but first want to point out that the area north of the Grand Canyon is both intensely and appropriately managed by the various state and federal agencies with statutory management authority for the area.

We also believe that the American public has the right to use and enjoy our natural heritage in diverse ways. Some people enjoy the wilderness experience and some enjoy other forms of recreation such as hunting, legal off-highway vehicle use, or just enjoying the beauty and solitude that the Arizona Strip and Kaibab Plateau has to offer. To meet the demands for all users of the land, we believe a diversity of management approaches is necessary. Changing the current management direction in the area being proposed for monument status would limit the ability of many legitimate recreationists without clear justification or benefit.

For those who enjoy a wilderness experience, they already have millions of acres in the region set aside for their use. In Northern Arizona and Southern Utah, there are already a number of areas that have been designated as parks, monuments, and wilderness areas. In a review of the area, we find that there are eight wilderness areas totaling about 400,000 acres in total administered by the Bureau of Land Management including:

Beaver Dam Mountains Wilderness – 19,600 Acres  
Cottonwood Point Wilderness – 6,860 (contiguous with 44,531 acre Canaan Mountain wilderness in southern Utah)  
Kanab Creek Wilderness – 75,300 Acres  
Paria Canyon-Vermilion Cliffs Wilderness - 112,500 Acres  
Grand Wash Cliffs Wilderness – 37,030  
Mount Logan Wilderness -14,650 Acres  
Mount Trumbull Wilderness – 7,880 Acres  
Paiute Wilderness – 87,900 Acres

In addition, there are a number of existing very large national monuments and parks for visitors who enjoy such outdoor experiences. These national monuments and parks include:

Vermilion Cliffs National Monument – 294,000 Acres (includes two wilderness areas)  
Grand Staircase-Escalante National Monument – 1.9 million Acres  
Natural Bridges National Monument – 7,636 Acres  
Bryce Canyon National Park – 35,832 Acres  
Zion Canyon National Park – 148,850 Acres  
Canyonlands National Park – 337,570 Acres  
Grand Canyon National Park – 1,217,403 Acres

In the aggregate, these areas provide the American public with a total of about 3,941,000 acres for their use and enjoyment. When combined with the wilderness areas in the region, over 4,300,000 acres have been established for specialized recreational experience. To put this in perspective, this is about the size of the states of Rhode Island and Connecticut combined. Given these data we believe it is important to ask if another national monument is necessary? Further, isn't it important to have an area where diverse recreationists can enjoy their different recreational pursuits?

Another concern that we have with the proposal is that the request clearly appears to circumvent the ongoing revision of the Kaibab National Forest Plan to placate a few special interest groups who insist their environmental views are superimposed on all of the Arizona Strip. We on the other hand, believe that the current forest planning process has afforded the opportunity for broad public involvement as mandated by the National Environmental Policy Act, which is the best approach for decision-making on the management of the Kaibab Plateau and surrounding area. We believe that the statement in the Notice of Intent to Revise the Forest Plan (April 4, 2009) establishes an important message to those who value the North Kaibab as an incredibly important American resource where it states "Since the Forest Plan was approved in 1988, there has been a shift in management emphasis from outputs to outcomes, new science information and understanding, and changes in economic, social, and ecological conditions." It is this blend of new science and the recognition of the changes in effective management approaches that bodes well for the continued management of this unique area under its current administrative authorities.

We believe that there are serious flaws in the six points that the proponents use to justify the need for designation of the Kaibab Plateau and surrounding area as a national monument. For each of these points, there are clear and effective regulatory mechanisms to ensure proper management of these resources that seem to be openly ignored by the proponents. Further, their arguments fail to recognize changes in both state and federal management approaches in recent times that are more effective at resource protection. We would ask that you and others who are in decision-making positions consider the following when evaluating the need for monument status for the Kaibab Plateau.

The Conservation Priorities that the proponents present are:

1. **Stop old growth logging.** At one time, cutting of old growth trees had a serious impact to ponderosa pine forests, however, newly enacted timber harvest strategies are in place to protect this resource. The Kaibab National Forest is near completion of the Forest Plan that will guide timber harvest strategies for the life of the plan. In looking at the April 2010 Forest Service guidance document titled *Ponderosa Pine Forest Desired Conditions* it is stated that the desired condition of this vegetative community is "Old Growth" is well distributed in the landscape. Further, much of the research that resulted in the development of the goshawk guidelines was conducted on the Kaibab Plateau and it is appropriate that these guidelines, which clearly lay out the need for retention of old growth trees is incorporated into the decisions on current and future timber harvest strategies. The goshawk guidelines prescribe clear and measureable volumes of old growth that needs to be maintained for the benefit of this species. In reviewing the

paragraph on page 3 of the proponent's proposal for monument status, they state "The Kaibab Plateau sustains a rare example of a fundamentally intact, mature southwestern ponderosa pine forest retaining the highest density of ancient trees outside of protected areas." This statement offers testimony to the effective timber management that takes place on the North Kaibab Ranger District. Further, new understanding and practices such as the *Large Tree Retention Strategy* developed by the 4 Forest Restoration Initiative Stakeholders Group lends new approaches to forest management with the intent of retaining old growth trees.

## **2. Protect Cultural and Archaeological Sites.**

The proponent's implication here is that monument designation is necessary to protect cultural resources and archeological sites. This is simply not accurate as there is an extensive body of both state and federal laws that provide a very high level of protection for cultural resources and archeological sites. Title 41 of the Arizona Revised Statutes contain a series of state statutes that prescribe how state agencies have a responsibility for protecting these important resources. A portion of the statute clearly mandates that any state-sponsored action have to ensure that the prehistorical, historical, archeological, or culturally significant values will be preserved or enhanced.

It is important to note that the National Historic Protection Act of 1966 as amended also provides very clear direction and puts in place programs for the protection of all cultural/archeological resources. In the aggregate, these laws provide substantial protection for these resources and violations can result in sanctions to include felony charges and fines up to \$100,000. Monument status will do nothing to change the statutory protection for cultural resources.

## **3. Manage for Native Wildlife and Wildlife Migration Routes.**

All species of wildlife and the habitat they depend on are well managed on the Kaibab Plateau under several guiding documents. First, as previously mentioned, the Kaibab National Forest is nearing completion of the Forest Plan and many of the concerns raised by the monument proponents are being addressed in this plan. As stated in the most recent draft of the Forest Plan there is recognition of the need for interconnected habitats. Further, the Forest is a participant in the Arizona Wildlife Linkages Workgroup, a recently formed group whose charter is to ensure to the extent possible that wildlife has passages between key areas and among discrete population segments to optimize genetic exchange and maintain population viability.

The management of wildlife and wildlife habitat is conducted under a cooperative approach between the Arizona Game and Fish Department, the Forest Service, and the Bureau of Land Management as appropriate depending on the current land status. We believe the cooperative management approach among these agencies is progressive and wildlife populations are doing well. As an example, as the result of collaborative habitat management programs on the national forest, habitat conditions are improving and the mule deer population is responding to better conditions. The proponents make reference to the need for a scientifically credible analysis of the potential for recovery of the extirpated Mexican gray wolf. Currently, the U. S. Fish and Wildlife Service is leading a

large group of key scientists and stakeholders in development of a new Mexican Gray Wolf Recovery Plan. In this era of limited state and federal funding for wildlife management, it just makes no sense to duplicate such an expensive program review. It is also important to reiterate that much of the area is presently managed under the umbrella of the Grand Canyon National Game Preserve, a status afforded by President Theodore Roosevelt in 1906. This status recognizes the importance of the wildlife of the region and ensures collaborative and effective management of the region's wildlife under the current agency administrative authorities.

#### **4. Reduce Road Density.**

The Kaibab National Forest has instituted their Travel Management Rule (TMR) for the North Kaibab Ranger District and currently supports the closure of roads on the Forest. The TMR in its current form recognizes the need for change in road management and the importance of resource protection with the following approaches:

- Roads will be open to important and popular destinations.
- Open roads will minimize impact to natural and cultural resources.
- Provide for reasonable access for hunters while minimizing habitat disturbance.
- Motorized dispersed camping will have reasonable access while minimizing resource impacts.
- Prohibits most forms of off-road travel.

In recognition of the importance of road management, the current draft of the TMR proposes the closure of 380 miles of roads on the forest. We believe that the Forest has taken a progressive approach to road management in the development of the TMR and that this process has had the opportunity for broad public involvement. We agree that the extent of any road network on publicly held lands should not exceed a density based on credible scientific standards and after review of the North Kaibab Ranger District; it is clearly evident that this objective is being addressed within the current TMR planning process.

#### **5. Provide for Voluntary Retirement of Grazing Permits**

Grazing management is a complex and often controversial topic. The Forest Service has been responsive to change and different management approaches as new grazing regimes have been developed. Within the draft Forest Plan there are several key points that support the Forest Service approach to grazing management.

- As grazing permits are waived back to the Forest, they should be evaluated for conversion to forage reserves to improved flexibility for restoring fire-adapted ecosystems and range management in times of drought.
- Annual operating instructions for livestock grazing permittees should ensure livestock numbers are balanced with capacity and address any relevant resource concerns, (e.g., forage production, fawning habitat, soils, etc.).
- Post-fire grazing should not be authorized until Forest Service range staff confirms range readiness.

We believe that these approaches are important recognitions of the need to use best management practices in grazing on public lands.

#### **6. Prevent New Uranium Mines**

As the proponents state, uranium mining on 1,000,000 million acres was precluded for a period of 20 years by Secretary Salazar and was made public during his January 9, 2012 statement. As with the several of the other issues raised by the monument proponents, this decision was made after considerable open public debate. We believe this is adequate protection for the foreseeable future and a decision that can be revisited in 20 years. It should not be used as the basis for designating a new national monument.

In closing, we believe the proposal is a clear attempt to by-pass the ongoing planning and management efforts that serve wildlife, wildlife habitat, and the public well with the intent of satisfying a few special interest groups. We strongly disagree that the designation of a new monument on the Arizona Strip is either needed or in the best interest of natural resources or the American public. As we pointed out, there is already over 4 million acres in wilderness, monument, or park status in the region and the designation of another 1.7 million acres is not justified. We believe that maintaining the current management authorities is the most appropriate approach.

If you have questions or need any further clarification, please feel free to contact:

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