



March 30, 2016

Christy Goldfuss
Managing Director
White House Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

RE: Proposed Grand Canyon Watershed National Monument in Arizona

Dear Managing Director Goldfuss:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 non-profit organization whose mission is to educate and inform sportsmen, wildlife conservation organizations throughout the state and the public at large on important issues related to wildlife and wildlife habitat, and to provide, via grants or other sources, funding to conserve Arizona's wildlife populations through habitat enhancement initiatives.

The organization is comprised of twenty seven member groups, affiliate members, and partner organizations whose goals and objectives are consistent with the mission of AZSFWC. Our member organizations are a diverse cross section of sportsmen and women, representing hunting groups, angling groups, shooting groups, wildlife and fish conservation groups, and a couple groups that work with youth, first responders and wounded warriors.

AZSFWC is aware of the Theodore Roosevelt Conservation Partnership's report entitled "*National Monuments: a Sportsmen's Perspective*", which outlines eight key tenants that must be met to gain widespread hunter and angler support for new national monuments. It's a well thought out document.

The Antiquities Act has been a powerful conservation tool, but our organization believes it should only be used in a thoughtful and inclusive manner, and only when necessary to achieve a greater measure of protection for land and resources than what they are currently afforded. In some states, organized sportsmen groups and businesses have supported new monuments, notably in Colorado and New Mexico. That level of support and inclusiveness **does not** exist in Arizona for the proposed Grand Canyon Watershed National Monument (GCWNM).

AZSFWC letter to White House CEQ Director opposing a Grand Canyon Watershed NM – 3-30-2016

Arizona Sportsmen for Wildlife Conservation
PO Box 12590 Glendale, AZ 85318

We are also well aware of the management issues surrounding Arizona's wildlife, and how complex that can be, particularly in dealing with land ownership matters, and the various Federal designations placed on much of that land. Arizona has more National Monuments (18), than any other State in the Union. In fact, only 23% of the remaining federally owned land in our State does not have some sort of special designation. We do not believe we need any more!

We are supporters of the multi-use concept on our public land. That approach allows the general public the most recreational opportunities for whatever pursuit they may desire; from hunting, to fishing, wildlife watching, boating, hiking, camping, photography, or OHV use. This multi-use approach has also allowed the AZ Game & Fish Department (AZGFD) to work closely with the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) in concert to further the objectives of the multi-use concept for the land and wildlife.

That partnership is not broken, and we do not believe another layer of bureaucracy is needed to conserve or "protect" 1.7 million more acres on the Arizona Strip or Kaibab National Forest. Proponents have put forth some reasons why they think a monument designation is needed, but we believe their reasoning is simply a solution to a non-existing problem!

Some of those issues include the following:

- **Protection from uranium mining** The area is already protected under a moratorium on uranium mining until the year 2032. If that ore is ever needed, we might have an environmentally safe technology in the future that would allow for clean extraction.
- **Protection of old growth trees** Arizona's forest products industry is but a shell of its former self and selected harvest and forest management shouldn't be eliminated as a viable management tool. Some of the catastrophic fires over the last decade demonstrate the importance of regulated forest management.
- **Public land grazing** The proponents of eliminating what they call "inappropriate livestock grazing" would eliminate ranchers who exhibit good stewardship practices for both the land and wildlife. No one wants poor land stewards and they should be dealt with accordingly, but the good ones not only make a living ranching, they do so with wildlife in mind. The AZGFD works hand in hand with ranchers and private land owners all over the state to that end.
- **Road closures** Extensive travel management plans have been undertaken by the USFS and BLM resulting in the closure of many roads, and access for many citizens. We do not believe the public needs to be further shut out from accessing our public lands.
- **Wildlife migration corridors** Some have said our premiere mule deer herd may be in jeopardy as they move between Arizona and Utah, but so far they are not. If there ever is an issue, we should seek to remedy and mitigate it - not adopt another set of rules on this area now for a non-existent problem.

AZSFWC letter to White House CEQ Director opposing a Grand Canyon Watershed NM – 3-30-2016

Arizona Sportsmen for Wildlife Conservation
PO Box 12590 Glendale, AZ 85318

President Theodore Roosevelt's legacy has already protected much of the Grand Canyon. In fact, the Grand Canyon National Park was first a monument, but now is a National Park and citizens must pay to see it and enjoy it. The National Park Service is behind in maintenance and management, and is millions of dollars in arrears. We don't have that problem on the Kaibab and Arizona Strip so we would respectfully request that you not seek to designate these lands as a monument and subject them to more rules and regulations that are not only unnecessary, but would complicate the management of Arizona's wildlife by the AZGFD.

National Monuments are special places for our country but we can ensure Arizona's beautiful landscape and abundant wildlife is properly managed and conserved by the continued cooperation and partnership of the AZGFD, USFS and BLM, without the necessity of another national monument designation.

Thank you for your consideration.

Yours in Conservation,

A handwritten signature in black ink, appearing to read "Jim Unmacht". The signature is stylized and somewhat cursive, with a long horizontal line extending to the right from the top of the first letter.

Jim Unmacht
President

CC:

Whit Fosburgh, President and CEO, TRCP
Tommy Beaudreau, Chief of Staff, DOI
Robert Bonnie, Undersecretary for Natural Resources and Environment, USDA
Arizona Congressional Delegation



AZSFWC Member Organizations Opposed to the Creation of a Grand Canyon Watershed National Monument

Anglers United
AZ Antelope Foundation
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Bowhunters Association
AZ Catfish Conservation Association
AZ Chapter National Wild Turkey Federation
AZ Chapter Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Elk Society
AZ Flycasters Club
AZ Houndsmen
AZ Outdoor Sports
Coconino Sportsmen
Mohave Sportsman's Club
Outdoor Experience 4 All
South Eastern AZ Sportsmen Club
SRT Outdoors
The Bass Federation
Xtreme Predator Callers
1.2.3.Go...

AZSFWC letter to White House CEQ Director opposing a Grand Canyon Watershed NM – 3-30-2016

Arizona Sportsmen for Wildlife Conservation
PO Box 12590 Glendale, AZ 85318