April 11, 2016

RE: Sportsmen Opposed to the Proposed Grand Canyon Watershed NM

My name is Jim Unmacht, and I am the President of Arizona Sportsmen for Wildlife Conservation (AZSFWC).

We are 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, among other objectives, including funding for habitat enhancement initiatives in Arizona.

Our 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 made up of a diverse cross section of sportsmen and women. Those groups represent hunting groups, angling groups, shooting groups, wildlife and fish conservation groups, and a couple groups that work with youth, first responders and wounded warriors.

Arizona Sportsmen for Wildlife Conservation and 24 of our member groups, representing thousands of Arizona residents, oppose any form of a national monument in and around the so-called Grand Canyon Watershed.

The consensus among most sportsmen is these lands and the wildlife they support are currently being managed appropriately by the Bureau of Land Management (BLM) and the US Forest Service (USFS) in coordination with the Arizona Game and Fish Department (AZGFD) through open collaborative processes under existing multiple-use mandates.

This cooperation and partnership isn’t 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 offered some reasons why they think a monument designation is needed, however we believe their reasoning fails to even acknowledge the many management improvements that have taken place in the last few years, defeating most of their arguments.

Some of those issues include the following:

- **Access and Road closures** Extensive travel management plans have been undertaken by the USFS and BLM resulting in the closure of many roads, and access for the general public. A 20% reduction in open roads has already occurred on the North Kaibab Ranger District, and an almost 18% closure on the

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Tusayan Ranger District. 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. This area continues to offer some of the best places to hunt mule deer on the planet! 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. A working group was set up to monitor this, the AZ Wildlife Linkages Workgroup.

- **Wildlife management** Managing 800 species of wildlife in our state is a complex task undertaken by the AZGFD. More rules and regulations mandated by a national monument designation complicates those efforts, like they have done on some of Arizona’s other 18 National Monuments. As examples, the designation of the Sonoran Desert NM has impaired recovery efforts for the endangered Sonoran pronghorn, and in the Ironwood Forest NM it has restricted water development projects critical to the desert bighorn sheep population. In both of these examples, the monument designation substantially increased the associated costs involved with the management efforts.

Of note here, sportsmen pay for these costs, not the taxpayer!

- **Recognized Habitat improvements** Another layer of “protection” on the Kaibab National Forest would likely impede some of the collaborative efforts underway right now, with the Burnt Corral collaborative and the 4FRI collaborative. A healthy forest landscape can only benefit Arizona’s wildlife. Some of the catastrophic fires over the last decade demonstrate the importance of regulated forest management.

- **Motorized Game retrieval** Additional restrictions have been implemented to minimize any adverse impact to the land when a sportsman is retrieving a harvested animal. At the same time, additional enforcement and educational programs have been implemented to address other off road activities.

- **Multi-use concept** We support the multi-use concept on our public land allowing the general public more recreational opportunities for whatever pursuit they may desire; from hunting, to fishing, wildlife watching, boating, hiking, camping, photography, or OHV use. The cooperation between AZGFD, USFS and the BLM not only benefits sportsmen and the general public, but the land and wildlife too.

National Monuments are special places in our country, however 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 here. In fact only 23% of the remaining federally owned land in our State does not have some sort of special designation.

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President Theodore Roosevelt's legacy has already protected much of the Grand Canyon. In June, of 1906, he 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 sportsmen and stakeholder input.

For the record, there is no hunting on the Grand Canyon National Park, and it was first a monument. Now as a National Park, citizens must pay to see it and enjoy it. At the same time, the National Park Service is behind in maintenance and management and is millions of dollars in arrears.

Absent problems on the Kaibab National Forest and Arizona Strip, why would we want to designate these lands as a monument and subject them to more rules and regulations we already can’t afford?

The bottom line is we don’t need a solution for a problem that doesn’t exist.