



**ARIZONA WILDLIFE FEDERATION**  
PO Box 51510  
Mesa, AZ 85208

March 5, 2015  
The Honorable Ann Kirkpatrick  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Representative Kirkpatrick:

Thank you very much for the opportunity to comment on the proposal to create the Grand Canyon Watershed National Monument (GCWNM) in northern Arizona.

The Arizona Wildlife Federation (AWF) is the oldest wildlife conservation organization in the State. We have worked tirelessly to protect wildlife habitat in our wonderful state for 92 years. The AWF is a leader in the broad-based statewide coalition that worked to develop the moratorium on new uranium mining claims near the Grand Canyon. We applaud your efforts to permanently protect these critical lands from uranium mining threats and look forward to working with you in that regard.

We are very concerned, however, about the reach of the pending proposal to create the GCWNM in northern Arizona and believe that miscellaneous key protections outlined in this proposal are already in place through numerous Federal and State regulations and that the new designation will add an unnecessary level of “oversight” which will do little to improve the situation. There’s a good possibility that with this added oversight the opportunity for legal actions may increase and further impede much needed forest thinning and fire management treatments and maintenance of important wildlife water developments. Additional problems associated with access and traditional pastimes may also be adversely impacted.

When the GCWNM proposal first came to light several years ago there was widespread opposition from the sporting community and the Arizona Game and Fish Department and Commission. There appears to be little to no change in the proposal presented today so we must continue to oppose this designation.

Proponents of the GCWNM designation do not acknowledge the management improvements that have occurred in recent years (highlighted below).

- A 20% reduction in open roads on the North Kaibab Ranger District and an additional closure of over 18% on the Tusayan Ranger District.
- The Kaibab National Forest implementation of a new Travel Management Plan as well as a new Land and Resource Management Plan that addresses items such as timber harvests and clarification of protective measures for Threatened and Endangered Species including the Northern Goshawk and Mexican Spotted Owl.
- The additional restrictions which have been implemented to minimize motorized big game retrieval for deer and additional enforcement and the educational programs implemented to address other off road vehicle activities.

- The new collaborative efforts underway which include the Burnt Corral collaborative and the 4FRI collaborative which recently endorsed the FEIS and ROD on a 2 million acre restoration project that includes protection for old growth and large trees.
- The formation of the Arizona Wildlife Linkages Workgroup to address connectivity and migration routes.

The AWF strongly supports additional actions to address future threats posed by uranium mining near the Grand Canyon particularly given the threats posed by existing grand-fathered-in claims and mines, it is unclear how or whether the GCWNM designation will impact those operations.

The widespread support for the uranium moratorium was a fine example of how diverse groups and individuals can work collectively to achieve a common goal. Important decisions, such as the development of the GCWNM proposal deserve a similar consensus-building process.

We believe that this proposal is an over-reach in its size, scope, and the lack of consideration of the remedial actions which are continuing today. And, we are convinced that its implementation will require additional layers of bureaucracy and cause delays in critical habitat-protection.

We thank you for this opportunity and we would willingly participate with you and others in any alternative conservation effort that will truly improve this highly valued and historically important landscape.

Sincerely,  
Tom Mackin, President