WALNUT CANYON NATIONAL MONUMENT
SPECIAL STUDY COMMENTS
THROUGH AUGUST 2010

ATTACHMENTS

ATTACHMENT 1: COMMENT FORM RESPONES

	QUESTION 1 (WHY IMPORTANT/SPECIAL)	QUESTION 2 (RECREATIONAL/VISITOR OPPORTUNITIES	QUESTION 3 (RESOURCES)	QUESTION 4 (MANAGEMENT ISSUES)
1	I'm an outdoors person & I coordinated the Loop Trail Program from 2008 - 2010. I conducted numerous surveys on public use of the Loop Trail & there was overwhelming opposition to motorized traffic, but great support for mt. biking access. Part of the Walnut Area under consideration will more than likely impinge on the Loop Trail, & it would be a great loss to Flagstaff & all outdoor recreationist (non-motorized) to lose this portion of the Loop Trail. Further, much work has already gone into planning & routing the Loop Trail. I do not like this idea. It is expensive and hard to keep these parks open. These areas of concern already have management and wildlife safeguards in place. Where is the public lands going to be if we keep closing them.	MT BIKING & THE LOOP TRAIL. (KEEP!) If horse access is allowed, it should be restricted & monitored as these folks to a great deal of damage to trails & introduction of invasive species. Keeping all roads open for the public to enjoy.	Observation of ecosystem fragility & threated species, Loop Trail routing, watershed protection. Impacts of recreation to trails, smells & sounds of forest, and preservation of cultural resources. The cost and impact it will have on the communities.	Make sure motorized traffic is limited or denied to most areas. If you close that area (hope that never happens), what increased activities could effect the outer boundries and resources.
2	This letter is in response to your April 5, 2010, correspondence regarding the National Park Service (NPS) and U.S. Forest Service (USFS) initiating a special resource study to explore management options for a 30,000 acre area of the Coconino National Forest surrounding Walnut Canyon National Monument. The Hopi Tribe claims ancestral and cultural affiliation to the Sinagua prehistoric cultural group in Walnut Canyon National Monument and surrounding Forest Service lands. Walnut Canyon is an ancestral home of the Bluebird and Bearstrap Clans and a Traditional Cultural property of the Hopi Tribe. Therefore, we appreciate the NPS's and USFS's continuing solicitation of our input and your efforts to address our concerns. The Hopi Cultural Preservation Office supports identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the archaeological sites of our ancestors to be Traditional Cultural Properties. We understand this study results from an Act of Congress and involves a possible expansion of Walnut Canyon National Monument. We have participated in such studies previously. As Director of the Hopi			

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	Cultural Preservation Office, I will be the contact person regarding the Walnut Canyon Study. To set up a meeting with the Hopi Cultural Preservation Office to discuss issues of mutual concern related to the study, please contact me at 928-734-3611 or lkuwanwisiwma@hopi.nsn.us. Thank you for your consideration. Respectfully, Leigh J. Kuwanwisiwma, Director			
3	The historical and archelogical significance to the country, Arizona, and the local citizenry especially.	birdwatching petroglyph viewing & protect the entire park	Archelogical, native cultural interests need to be considered and protected.	not to let development impinge on the area
4	Walnut Canyons history, archeological sites, wildlife and birds. This area has the above interests important to me because I do not have them near my home.	I believe that wildlife viewing an bird watching should be encouraged to help keep humans connected to nature. And the preserve and enhance the archeology.	the natural areas, wildlife habitat, bird sanctuary and the protection of this unique area for Northern AZ	Bird habitat, wildlife mgmnt & protection, and the protection of the Native American sites
5	Unique Cultural Resource Natural Resources Sacred space to Native People	Bird Watching Apreciation of native plants & archeology sites Pictogrphs & Petroglyphs	Wildlife Native American archaeological site Petroglyphs - Pictographs Old growth fores	Needs Congressional designation for the entire study area to protect from development - Protect entire watershed--
6	I don't want beautiful, scenic sites destroyed. historical, cultural, beauty value I don't want to see this area developed i.e. turned into a subdivision.	None parking, advertisement It should be maintained for rock climbing opportunities. Biking, hiking.	?	
7			water, historical	
8			The trees, historical sites, H2O, the critters	Be designated as National Park and Preserve
9	I don't want beautiful, scenic sites destroyed. historical, cultural, beauty value I don't want to see this area developed i.e. turned into a subdivision.	More advertisement to invite public - mainly to emphasis on public awareness of pre-historic cultural presresvation, pre-vention of destruction, pot and artifact collection prevention, to circulation of awareness of sensitive treasures of our few Wild lands & Habitat.	all Wild land resources. Flagstaff is big enough - no more construction.	all natural Habitats for all Wild life. There had been
10				This area needs to be a National Park!!
11	Because it is a beautiful area.	Keep Area Protected	Keeping the Resources safe	Protcet it from houses & highways
12		Please leave open for cycling!		The area is beautiful and important to the health of our ecosystem, and should be protected be

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				protected from development.
13	It is important to maintain the area, canyon for all future residents.	The encroachment of blding divisions.	Wildlife, Wildlife, Wildlife, and def. watershed.	
14	Walnut Canyon is a beautiful natural resource and has great historical value.	Preservation of the sight and integrity of the ancient artifacts at Walnut Canyon	Old growth Ponerosa Pine stands, wildlife, watershed and viewshed, cliff dwellings, historical lodging remains.	Protection through formal management and maintenance of the site.
15				Protect Walnut Cyn by giving it federal status.
16	I enjoy Mountain Bike riding between Lake Mary Road and Fisher Point	Mountain Bike Riding	Bike Trail	Environment protection
17	We need open space areas around such an important National Monument.	hikin/biking trails		
18	I have made many trips into the Walnut Canyon Study Area--along jeep trail; directly to SP dam; Fischer Point top; bottom (trail between). As development nears from NW, this needs to be stopped as this now is.	water protection of ruins		Ideally, the National Park Service would manage largest possible area under this study.
19	To determine recreational uses within the canyon.	Hiking to the Santa Fe Dam. Hikers need to be able to cross trust lands to access the forest.		
20				Please Protect our National Park. Thanks The Family, The citizens
21	The Study Area is a beautiful & important part of Arizona. It is not only a great place to visit, but it is very culturally enriched.	Housing Development should be prohibited.	Wwildlife, water & trees	The federal government should make this area a priority & protect against development.
22				this area, Walnut Canyon should be designated as a national Park & Preserve.
23	Ongoing history for our children & grand children.			Study area needs a congressional designation for protection against development.
24				Please protect this area with a federal designation. It has been way too long for this to occur.
25	Walnut Canyon is part of my community that I feel needs protecting. It is full of natural resources that have existed for many years.	Leave the surrounding area protected, limet any Furter Building.	native plants, water, soil, wild life.	Preserving the natural environment.
26				I would like this land to be a national park.

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27	The Study Area is important to me because of ancestarial sites as well as the natural beauty of the area. It is special to me because it offers an educational as well as a cultural awareness opportunity.	The Walnut Canyon archaeological site is possibly only a small portion of a larger "cultural use area."	The ecosystem as a whole. How is development impacting the area? The Ponderosa Pine is a valuble resource.	Consultation with Hopi Cultural Preservation Office.
28	The Study Area is important to me because of ancestarial sites as well as the natural beauty of the area. It is special to me because it offers an educational as well as a cultural awareness opportunity.	hiking and equestrain trails, rock climbing	the natural beauty of the area	ecological health of the area
29	Walnut Canyon should be preserved, protected, & established as a permanent park	Backpacking, hiking, horseback riding, & all around enjoyment of preserved nature & wilderness.	Ponderosa Pines, wild life, Historical preservation!	Congressional Designation to protect Walnut Canyon.
30				This area has my advocacy vote to remain as wild & special as it is wihtout another housing development that would NEGATIVELY impact another of Flagstaff & AZ's special places.
31	archeological sites, animal habitats	The National Park		I think the Walnut Canyon Study area needs to be protected from encroachment from Flagstaff
32	It's a beautiful area.	Climbing & Mountain Biking	Water land & ecology	Protection of Walnut Canyon
33	The historic sites are incredible. Needs to be preserved.	managed trails	Native American cultural sites	Maintain the beautiful viewshed
34	I've always heard of it's beauty, but haven't had a chance to enjoy it first-hand.	I would be most interested in equestrian trails, hiking trails, and rock climbing areas.	The natural wildlife, water ways and vegetation.	They should evaluate what type of land management policy and legislation would have the most effective and lasting protection.
35	This is a beautiful area which I and my children have enjoyed for years.	Hiking & mountain biking	Cultural/historical Native American sites. Ponderosa pine growth & preservation.	Congressional designation to protect area from building. Designation of the area as a national park/preserve.
36	Sacred & beautiful nature needs to be protected.		All in area	needs to be part of national monument
37	The Study Area is important to me because of ancestarial sites as well as the natural beauty of the area. It is special to me because it offers an educational as well as a cultural awareness opportunity.	hiking, education	wildlife, historical sites	protecting the site from city encroachment.

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38	This ia a unique and valuable ecosystem that needs to be preserved. Everyone will benefit from this area. Wildlife and people a like are drawn to this area for its benefits. The Walnut Canyon has been a special place since I was little. I've lived here in Flagstaff my whole life and would like to keep it protected, exspecially the Native American historical sites.	This area should be left open for the enjoyment of all recreation such as hiking, biking, bird watching and cross country skiing. OHV and ATV use should NOT be allowed. Native American sites, the animals that rome throgh the area.	The unique diversity of ponderosa pine, animal and cultural sites.	I strongly believe this area should be set aside as a national park, or national monument.
39			Keeping the Walnut Canyon from being constructed over. Keep it safe	
40	Local Flagstaff resource. Source for native vegetation, wildlife	non motor vehicle use. Open public use.	historical archeology. Old growth pine Forest. Specific boundaries. water source for wildlife habitat	designation as nationally protected resoure. Recreation area indicates importance on use rather than protection of natural environment.
41	Native American Cultural sites and scared places	Hiking	Old Growth Ponderosas Pine	
42	Historic & beautiful - let's keep it for future generations	Maintained trails	Keep development out	Make it a National Park
43	Old Growth Ponderosa Pines Stands	Native American Cultural Sites and Sacred Places	The Wal Nut Canyon Watershed and Viewshed	Wildlife - Bear, Mt Lion, Mexican Spotted Owl, Peregrine Falcon
44	Walnut Canyon is unique both as a natural landscape and a part of southwest cultural history.	The current hiking trail is terriffic and should be preserved. There's no need for additional uses.	Native American cultural history. Wilflife and old-growth forest.	All of the canyon should be permanently protected from any form of development.
45	This area is close to my home and a fantastic escape from the city. It is simply gorgeous	hiking trail running biking	PROTECT WALNUT CANYON!	Keeping the area beautiful & protected. It is important!
46	Natural Arch. Sites	walking	preservation	preserve
47	Old growth protection	Access, but in a way that absolutely protects the area from overuse	Historical preservation of sites/cabins, etc.	Should be made a nat'l park/mont designation
48	old growth trees Ancient drawing/historical carvings	All of the Walnut Canyon Study area deserves a permanent Congretional Designation to protect it from houses and highways in the future.	old groth Ponderosa Pines Native American Cultural & Sacred Sites Watershed & viewshed Wildlife	Should be protected from development. Please make it a National Monument.
49	An incredible diverse cultural and wildlife area so close to a major town. Forested canyons are really special!			Expand the Monument to the whole study area!
50	The Historical Landscape of Pictographs and old growth Logging History.	Hiking, Horseback Riding	Pictographs, old growth trees.	Walnut Canyon needs Congressional designation as a protected area.
51	It is a local area we hike & bird watch in. We would like to see the natural resources preserved.	Hiking, bird watching no motorized vehicles allowed	wildlife habitat archaeological sites	This area ought to be preserved for life by an act of congress.

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52	it is adjacent to a very historical & ecologically important area of Northern Arizona which deserve to be preserved.			his area needs to be designated a national Park or preserve & deservs permanent congressional designation to protect it.
53	Great hiking, bike riding and other outdoor activities are important, but most important is creating a buffer that protects the core of Walnut Canyon.	Bike riding & hiking, bird watching, nature tours etc.	all the archeaological and cultural resources are of prime importance	Water resource protection
54				Needs congressonal designation to Prevent any development
55	A unique archaeological area that contains resources for future research on	Visitorship that is interpreted, possibly escorted, and does not damage the ruins and sites. No bikes or ATV's, designated trails for foot traffic only.	archaeological & ecological	24/7 protection of the resources
56	Past Natural Resource	Hiking	Food for wildlife	None
57	Our family loves the historical artifacts that are in the canyon - a wonderful place to take school children & tourists to No. AZ. I also enjoy hiking and horseback riding in that beautiful area. We need this green belt on the border of our city.	Please - no recreation! It will ruin the area.	wildlife protection and Native American cliff dwellings & artifacts old growth Ponderosa pines.	We need to designate W.C. a permanent Congressional designation to avoid development of housing tracts & highways.
58	Keep it in it's Natural State	Hiking limiting off road use	old growth ponderosa pine stands the watershed historical sites wildlife	
59	Our family loves the historical artifacts that are in the canyon - a wonderful place to take school children & tourists to No. AZ. I also enjoy hiking and horseback riding in that beautiful area. We need this green belt on the border of our city.	The recreational opportunities are critical but should be strictly limited to educational or interpretive visits. The most important aspect of any use should be preservation of this irreplaceable resource. No impact visits are possible and are the only acceptible use.	Landscape preservation. Artifact preservation. Natural quiet. Watershed protection	Limiting the introduction and spread of exotic species. Providing protection from disturbance other than what naturally occurs.
60	Need to preserve the little remaining open areas.	Make it accessible to all to see its natural beauty.	Preservation of the canyon	Avoid development through & near it.
61	The historical artifacts	Walking trail into the canyon	Preservation	Development
62	Protecting historic (& prehistoric) sites for present & future visitors, study, etc.	Opening up sites & recreational opportunities for visitors, academics, etc.	See above.	Protection of areas
63	Keeping Walnut Canyon and surrounding area free from encroaching development is important to me as an Arizona citizen. I feel strongly we need to preserve wilderness here.	Off road vehicles should be restricted from this area to prevent environmental and noise damage.		

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64	All of the Walnut Canyon Study area deserves a permanent congressional designation to protect it from houses & highways in the future.			
65	Walnut Canyon is a wonderful area.			It should be made a National Park. At least some kind of permanent Congressional Designation to protect it from houses & highways.
66	We hike and bike often in the area. We love the natural & human history in the area.	Hiking, biking	Wildlife protections, viewshed & watershed protections	Protection from development, both public & private.
67	recreation use near populated area	outdoor exercise for everyone	wildlife	how to keep area accessible to all
68	A very special habitat close to town accessible from town with an excellent trail (the AZ trail) going through it. Great for biking and hiking.	Hiking and biking on AZ trail should be maintained without additional buildup or development.	riparian habitat, invasive plant species impact of building and additional development preservation of old growth forest	Congressional designation seems very important to protect the area.
69	Walnut Canyon needs preserved. We need no further development.	Keep Walnut Canyon open for hiking and biking.	wildlife historical sites	protect the land - we need not develop there
70	Picture canyon, the waterfall, peace when going threw.	Horse Riding.	Waterfall, petroglypy, trees, animals	natural grasses
71	*Historical homes, & Native American culture - unique ecosystem that needs protection - Very Beautiful, Wildlife Watershed *This is a place to collect herbs for Native American Natural Healing	The area is a beautiful and unique spot for hiking.	The wildlife, cultural sites	The area around a park needs to be protected to also protect the ? Of the ecosystem of the park.
72	Relevance & proximity to Walnut Canyon	Hiking, mountain biking No OHV use	ponderosa pine forests erosion mitigation wildlife habitat	fire management No housing development No grazing allowed
73				not build housing project
74				not build housing project
75	The area is beautiful and full of historic sites, geography and wildlife.	Limited use to protect further the resources of beauty we have.	Ponderosa pine, watershed, historic sites	What effects do tourists have on the area
76				We need Congressional Support to prevent losing Walnut Canyon to Subdivision & Development
77	Its character and solitude.	snow shoe-ing; xc-skiing; mtb biking	Species; vegetation	Urban Interface; urban growth boundaries
78	We hike the area with our kids.			I want to protect it from development.
79	So we can continue to take our family hiking.			It's important for our parks to be protected.

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80	It is a special place with many important natural resources and just as equally important, cultural resources. This place has been important to humans for thousands of years.	low impact activities, interpetation, cultural programs, etc.	natural and cultural.	We need a strong leagal designation to truly protect this area. The best or only way to do this is through federal congressional designation. NP or NM.
81	Old growth ponderosa pine	Maintain cultural sites & sacred places.	wildlife & historial sites	Walnut Canyon watershed
82	unique environment	wildlife siting hiking	native american cultural sites	wildlife
83	preservation of natural habitat	field trips, hiking	pines, sacred sites animal life	we need congressional designation
84	To protect the area for future generations.	Low impact visitation	Volunteer plus use fees	Use NAU for more input and management
85	Currently there is a threat to the existing Walnut Canyon Nat'l Monument & the whole Walnut Canyon eco- system/watershed. This threat is growth of Flagstaff toward the canyon & impacts of current population centers. This is what makes the study important. The area is special because the canyon itself & southern approaches on Anderson Mesa are defacto wilderness & all these wilderness values associated with wildlands. Other values are early Flagstaff history associated with the area, sacred ancestral values to Native Americans, visual aestetic values, wildlife values (including Peregrine Falcons & spotted owls), riparian ecosystem values, & archeological values.	Current recreation uses should be maintained such as birdwatching, hiking, bike riding, equestrian. If Walnut Canyon N.M. is expanded into this area, the enabling legislation should authorize current uses but managed in such a way as to not compromise the resources. Native American traditional uses should be maintained as well.	All of the above resources should be addressed.	The bottom line is that the entire study area needs to be overlayed with some kind of U.S. congressional designation that will ensure the existing resources into perpetuity. Since the Forest Service has no National designations that would pertain or be appropriate for this area, the existing Walnut Canyon N.M. should be expanded & be the stewart of the entire ecosystem & watershed. The Park Service is also better positioned & empowered to handle a wilderness/urban interface (Sabuaro N.P. an example). Also, an expanded monument would enhance the economics of Flagstaff & offer more educational oppoertunities for Flagstaff school children.
86			Keep as much land surrounding WACA free from development as a buffer.	The area needs to be large enough to support all of the vast array of wildlife indigenous to this region. Therefore, the only sensible course of action is to enlarge WACA National Monument to provide a continuous wildlife corridor.

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87	Walnut Canyon is an extremely sensitive cultural site of significance to the prehistoric as well as contemporary Native American experience. It also offers prime hiking in a wilderness setting. This area deserves & needs to be protected from any of possible encroachment efforts from Flagstaff.	Current recreation uses should be maintained such as birdwatching, hiking, bike riding, equestrian. If Walnut Canyon N.M. is expanded into this area, the enabling legislation should authorize current uses but managed in such a way as to not compromise the resources. Native American traditional uses should be maintained as well.		
88	With the close proximity to Flagstaff, it affords a wonderful area for numerous varied recreational opportunities while not at a high fuel cost for driving nor any "entry fees."	Current recreation uses should be maintained such as birdwatching, hiking, bike riding, equestrian. If Walnut Canyon N.M. is expanded into this area, the enabling legislation should authorize current uses but managed in such a way as to not compromise the resources. Native American traditional uses should be maintained as well.	wildlife, wildlife habitat, riparian areas, forest diversity	I think this should remain under Forest Service management utilizing a NCA approach with specific language to assure no net loss of any recreational opportunities.
89	It contains history of a people that occupied this area before Columbus. The protection these and the natural resoures that exist should have better protection from incrochment. Recreation can still be had, but sensitive resources should not take a back seat.	Some biking & hiking, but limit camping, many more areas in the local forest for that activity.	Both the cultural and natural resources.	In holding & current uses by businesses. Other uses by the public other than biking/hiking & camping.
90	I love to hike and horseback ride in the area. Love the beautiful meadow by Fisher Pt., and hiking the denses canyon, enjoying the solitude and wildlife.	No recreation - no, no, no! Maintain trails, no motorized anything. I love the quiet, which will become more important as our earth becomes more crowded.	Protect the ancient artifacts, the old growth Ponderosa, the birds & other wildlife.	Put this area under permanent Congressional protection - a Nat. Park? So that there will be no encroachment by cities or highways.
91	The study area is a vital natural resource to Northern Arizona. The number of special places like this study area are very limited and need to be presevered and restored.	To address a low impact visitor option is important.	Wildlife and healthy eco-system resources should be addressed.	1. No OHV use. 2. Restoration of impacted areas.
92	The study area is a vital natural resource to Northern Arizona. The number of special places like this study area are very limited and need to be presevered and restored.	I believe all current uses should be considered and maintained for future users. I do not believe the area (proposed lands) should be transferred to NPS jurisdiction.	1. All recreational opportunities that now exist. 2. Management of native wildlife to include habitat enhancement activities and population mgt. of large ungulates 3. Livestock grazing 4. Fuel wood gathering	I think the no action alternative should be closely evaluated. Any major restriction of current (status quo) uses will diminish the value of this "close to town" area. If a more restrictive level of mgt. is indicated, it can be best accomplished under uses USFS jurisdiction.

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93	I'm an avid outdoorsperson & I coordinated the Loop Trail Program from 2008 - 2010. I conducted numerous surveys on public use of the loop trail & there was overwhelming opposition to motorized traffic, but great support for mt. biking access. Part of the Walnut Area under consideration will more than likely impinge on the loop trail, & it would be a great loss to Flagstaff & all outdoor recreationist (non-motorized) to lose this portion of the Loop Trail. Further, much work has already gone into planning & routing the Loop Trail.	MT BIKING & THE LOOP TRAIL. (KEEP!) If horse access is allowed, it should be restricted & monitored as these folks to a great deal of damage to trails & introduction of invasive species.	Observation of ecosystem fragility & threated species, Loop Trail routing, watershed protection. Impacts of recreation to trails, smells & sounds of forest, and preservation of cultural resources.	Make sure motorized traffic is limited or denied to most areas.
94	great location for Mtn. Biking & Hiking. special because it is rideable from my house so no fossil fuels spent to get there.	Maintaing current hiking biking trails provided they do not infringe on cultural resource -- both prehistoric & historic (such as logging RR grades).	cultural as explained above wildlife	Don't know. I generally support expansion of the Nat'l Monument but would like to keep limited recreational opportunities (no motorized) available as long as they don't infringe on cultural resource protection.
95	Very simply it is a unique resource that is close to development and potentially threatened. Unique -- topography, ecologically, cluturally	low impact traffic on defined trails (foot & possibly bike & horse)	views, the ecologey, cultural	Hunting - No, camping - designated areas, and motorize vehicles -No
96	1. It is a wonderful area to hike & enjoy the wildlife & scenery.	Preserve the open spaces, non motorized preferred, for bird watching & winter skiing. And it is so close to Flagstaff.	Old growth Ponderosa Pine Forest Threatened bird species - wildlife in general Watershed View shed	1. I would like to see Walnut Canyon National Monument expanded to include the study area, with the exception of Campbell Mesa. 2. Absolutely no trading any of the study area. 3. Absolutely no roads or highways through the study area. 4. No motorized vehicles allowed in the study area, no matter what the designation. 5. No hunting in the study area.

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97	As Flag is expanding, it is important that "quiet" areas are protected from development. High density housing and more roads are not the answer and the canyon needs Nat'l monument status for protection.		I am very concerned about the human artifacts, eg, netate, pictograph, petroglyphs which are outside the Nat'l Monument. Some have already been desicrated as they are not protected. Also the Native animals are disappearing from the S/W and if not protected in the National Park, where will they go. The canyon has important migration corridors and is home to bear, Mt. Lion, Mex Spotted Owl & falcon. Lets keep them here!	To insure protection of Walnut Cyn, it is important that a Congressional Act create WC as a National Monument.
98	Walnut Canyon N. Mt. is an unique and wonderous place that needs to be protected from uncaring, thoughtless, and greedy people.			I would like to see a buffer zone adjacent to Walnut Canyon National Monument established, thus protecting the monument from adjacent development. I don't want to see any residences or commercial buildings or golf courses encroaching on Walnut Canyon National Monument.
99	I value both the natural and cultural resources of this area. There are great places to hike. Fisher Point is special. I value habitat for the Mexican Spotted Owl, Northern Goshawk and other fauna.	Hiking and bird watching - or other wildlife.	Natural Resources Cultural Resources Flora and fauna of the area Hiking Trails	ATV's and other offroad motorized vehicles should be prohibited. Natural and cultural resources should be protected. If hunting is allowed, hunters must pack out game.
100	Walnut Canyon is one of the most beautiful canyons in the Flagstaff area. This includes the area from Lake Mary to the Park within the canyon and the land North & South of the canyon that is undveloped. I hike in this area and appreciate the ruins, the wildlife, the trees & plans, the spring flowers, the aspens in the fall, the solitude & the spectacular views. I would like to see this area become a National Park.	Preserve the open spaces, non motorized preferred, for bird watching & winter skiing. And it is so close to Flagstaff.	The archeological resources in the study area need the protection Natl. Park Status would bring them - they should be studied & catalogued if not done already. I support hunting in the park but do not support vehicle retrieval. No motors in the study area - is hunting feasible w/o motors? I'd like to know what impact the roads to off road travel have on wildlife & the spread of invasive species.	I do not want to see the USFS trade land in this area for future development. The pressures will be great in the next decades as Flagstaff reaches 100,000 people. What guarantees can the USFS make that this will not happen? Only national park status can do that. I don't want to see the kind of encroachment on the park that happened to Petroglyph Park in Albuquerque -- subdivisions within view of the trails in the monument!
101				This area requires congressionally mandated protection to insure the values of this area remain protected.

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102	Hiking, Skiing & wildlife viewing.	Non-motorized - hike, bike, ski etc.	Natural beauty, quiet, wildlife, wilderness	Full protection for the whole study area. Make it a National Park.
103	Walnut Canyon and surrounding lands in the study area are irreplaceable open space. While the archaeological and historical values here are huge - I believe the protection of the natural is most important. I want to be sure that houses and and highways will never be in this area! The agency that acts now to protect the Walnut Canyon Study Area is the agency that acts with lasting importance.	Public access for hiking, biking, birding, cross-country skiing - hopefully without a fee.	Old growth Ponderosa Pine stands. Native American cultural and sacred sites. Walnut Canyon watershed and viewshed. Wildlife: bear, mountain lion, mexican spotted owl, peregrine falcon Early settlers' historical sites Historical logging remains	I want this study to end with some sort of Congressional designation to protect the whole study area! I believe Walnut Canyon would best be protected by the National Park Service. I want the state sections inside the study area to definitely be included in whatever designation comes out of this.
104	Walnut Canyon is a very special place, a gem in the Flagstaff area with historic wilderness & recreation values. That deserves expanded protection.	The study should be comprehensive and cover all values of biological, social, economic, recreational significance.	All resourses need to be considered so that the study is comprehensive. This includes areas ajacent to the monument.	I've said comprehensive but the idea of monument expantion is very important. The current monument surrounded by development would lose its biological significance.
105	Walnut Canyon Resources (both inside the existing Monument and areas surrounding the Monument). Walnut Canhyon, together with its associated watershed and canyon rims, contains a variety of ecological, botanical, geological, archaeological, scenic, historical, spiritual, and wildlife resources which include: a unique riparian ecosystem; ethnographic and cultural resources important to Native Americans; habitat for the threatened Spotted Owl as well as sensitive flora and fauna species; historical resources and landscapes relative to the opening of the west and early Flagstaff settlement and history; areas rich in plant diversity, including vanishing "old growth Ponderosa Pine; areas of spectacular beauty; and area of solitude and a wilderness experience. In addition, Walnut Canyon, together with its associated watershed and canyon rims, provides extensive opportunities for educational activities, ecological and anthropological research, aesthetic appreciation, and Native American spirituality. It also provides recreational activities of a wide and diverse nature. The Walnut Canyon National Monument purpose was to protect ancient cliff dwellings and associated resources	THE THREAT: The threat is an expand9ing urban area right on the doorstep of the existing monument and those resources outside of the monument. Though the Park Service works cooperatively with the U.S. Forest Service, the State Land Department, the City of Flagstaff and Coconino County, there will eventually be tremendous developmental pressure to expand the current growth boundary into Forest Service and State Land jurisdictions. Various initiatives to obtain the two State Sections closest to Walnut Canyon have failed with no solution in sight. Another State section, section 30, has not been included in the initiative and is ripe for trade. A major arterial, Fourth Street, is slated to run east of this section, and another major arterial, JW Powell Blvd, is slated to run just south of this section. This section is one mile from Fisher Point (the gateway to Walnut Canyon proper) and less than two miles from the	THE SOLUTION: The mission of Walnut Canyon National Monument is to protect the above resources and to tell the Walnut Canyon "story", and to do so into perpetuity. But not all the resources are in the existing Monument. For the complete story to be told, the Monument needs to expand into the surrounding area; and for the complete story to be protected, the Monument needs to expand into the surrounding areas. Expansion would include significant resources or opportunities for public enjoyment and research as described in the resources above, and would protect resources critical to fulfilling the purpose and significance of the existing Monument. Expansion would address operational and management needs such as addressing the entrance road into the existing monument, establishing a new visitors center near the freeway, and putting management of the resources under one jurisdiction rather than under two jurisdictions in different departments,	

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	that are of great ethnographic, scientific, educational, and spiritual value. The significance of Walnut Canyon National Monument, and indeed the entire Walnut Canyon ecosystem and watershed, includes: a concentration of ancestral Puebloan habitations which are unusual and include the only cliff dwelling architecture of the Northern Sinagua culture; natural and cultural resources known to be significant to contemporary native tribes as evidenced by oral history, continuing practices, and the archaeological record; ecological communities that overlap to form ecotones, bringing together species usually separated by elevation and therby creating a rare compression of flora/fauna zones (this biodiversity and high concentration of sensitive species is thought to have contributed to the decision of prehistoric people to settle here); a topographic relief and defacto wilderness that offers outstanding scenic resources (especially so close to a growing urban area); a concentration of artifacts that reflect early Flagstaff history; and a greenbelt and sanctuary to the citizens of Flagstaff.	existing monument. Another State Section, section 20 is in the Stage Two Urban Growth boundary and will definitely be sold in the not too distant future. A major arterial, Butler Avenue, ends against this section, and a major water line goes through it. This section is less than two miles from Fisher Point and only one mile from the existing Monument. A major development, Juniper Point, already in the development stage, is two miles from Fisher Point. Another State Section, Section 26, along with some private land, is just east of Juniper Point and will be next in line for development. This section is one mile from Fisher Point. All the preceding is what is currently transpiring, obviously there will be many more threats as the Flagstaff urban growth area expands. All of these areas butt up to, or are very close to the urban growth boundary and the Forest Service and offer extreme threats and pressure for future trades. Neither the City nor the Forest Service can guarantee, for the future, that areas close to Walnut Canyon National Monument, and the resources both inside and outside the Monument, can or will be preserved and protected.	which have different missions and sometimes conflicts in management objectives, goals and strategies. Expansion can feasibly be administered with existing uses, and there would be no purchase of private lands (other than what's already in the existing Monument). Expansion, because of Park Service expertise, would enhance the public education and understanding of the area and its relationship to the various cultures and history. Expansion would secure resource protection for future generations that other protections or management options cannot guarantee. Expansion would be a boost to the economic development of the City of Flagstaff and Coconino County. Studies have shown that this is the case with the expansion of existing Park Service units. Expansion would enable the Park Service to exercise its management experience with urban interface conflicts and cooperation (Saguaro National Park being a prime example). There are numerous criteria that are met that justifies Monument expansion, the above being some of them, but I think that the point has been made concerning resources, threats and solutions that I need not continue further.	
106	We are entirely happy with the management and services accomplished by the Coconino. I think it would be a huge disservice and waste of energy, effort and money to allow the Park Service to assume authority of this area.		Private inholdings - access roads	cattle permits - no new restrictions

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107	The study area that is currently shown is in my back yard. I use the public land for recreation (horseback, hicking, hunting etc.) for many years. (since 1991) It is very important to me that this area does not be limited in use. My property (113-07-001G) lies within the study area as does my 2.5 mile driveway that is currently in the non motorized area that I am permited to use. (USFS road use). The USFS has been and is currently man aging this area to its best use and does a great job of it.	The study should be comprehensive and cover all values of biological, social, economic, recreational significance.	If you are looking for a resource issue you will find one. The resources should be used by the public b ut not abused. The land has already been managed for this purpose by the USFS. Managed and studied by Park Service would create limited use of these resources.	The main issue that concerns me Is the expansion of the study area. I have been following the progress and have learned that every time the study comes up for public imput the boundry of the study area increases. The intrest of small groups have overpowered the rational thinking of Government and put the public and property owners at the mercy of there intrest.
108	I have enjoyed riding and hiking in the area and have always viewed it as a well managed area and trail system. I was shocked to see a proposal for additional restricted access. Why? Things are in balance and someone wants to fix something that is not broken.	Everything that is there now. I have asked what the "need" was for this study. I did not really hear an answer. Don't change a thing.	? Someone said we were "protecting the watershed." And to believe that riding or hiking on a trail is negatively impacting the watershed. Please! That can't be the real reason.	It would be nice to keep it the way it is forever. But, I fail to see the benefit of increased management control.
109	Proposed expansion of the Walnut Canyon national monument The new proposal, as differing from the original proposal, offered by previous congressional representatives J.D. Hayworth, and Karen English, is quite different. The original proposal involved a few square miles of land just north of the existing monument. As we are very familiar with the area in both the previous proposal, and current proposal, we can not agree that it meets the criteria needed for national significance. From the original proposal, there has been an addition of several square miles added south of the monument, which is not significant to the monument. The impact to the majority stakeholders, if this proposal is in acted, would be locally overwhelming. This would include camping, hunting, fishing, firewood collecting, fossil hunting, four wheeling, and generally enjoying this part of the forest. The majority stakeholders, people like my family, thoroughly enjoy these activities in this part of the Coconino forest. We realize that turning these areas over to a national monument, would severely restrict, or outright ban our recreation use of these areas. We have resiedences overlooking Padre Canyon. We have for many years been			

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	caretakers of this area. Looking at historical findings on our private property is just like looking at the same kind of artifacts in the Walnut Canyon area. What we discovered is that there are areas of artifacts identical to those found around in the Walnut Canyon area. In other words the artifacts found near Walnut Canyon are not exclusively unique to Walnut Canyon. The same type of ruins, pottery chips, obsidian tools, gravesites, and Native American artifacts, can be found all across northern Arizona. To add this area proposed to Walnut Canyon monument, is going to be more bureaucracy and red tape, during a time of downturn, when we should trying to avoid adding much more costs to our overburdened park system. Our family, Daniel McDonald, Maura Fahey, Mark Grosenick, and Elizabeth Fahey, would like to go on record opposing this proposed expansion. We love using this area, and would feel very restricted from using this area, if this proposal is allowed.			
110	The Study Area is a large piece of contiguous forest habitat in an area that is otherwise fragmented by freeways and development. It is an area of great biodiversity because it is deeply dissected by tributary canyons. It has stands of old-growth ponderosa pines, which are quite rare. It is a wonderful place for hiking.	I would like to see the area managed much like Saguaro NP on the outskirts of Tucson. So that there would be multiple points north and south from which to access the existing trails. It would be wonderful if there could be interpretive programs and volunteer projects even more frequent than now.	Mexican spotted owl, northern goshawk, pronghorn, other rare or uncommon (yet present) wildlife including gray fox, black bear, and mountain lion. Also riparian flora as well as sensitive species, such as *Hedeoma diffusa, Aquilegia desertorum, and Clematis hirsutissima var. arizonica.* Also old-growth trees - ponderosa, Douglas fir, Gambel oak.	Motorized use of muddy roads, restoration of some parts of the forest, where it is overgrown with small diameter trees, invasive weeds.
111	I have lived in the area for 33 years. I enjoy the activities on a daily basis. I walk daily and ride horseback often. A national park designation, I believe, would be detrimental to the current uses of the land. The area has maintained it's charm & beauty over the years as many other places close by have been gobbled up by housing & developments. There are many people who also use this region daily to walk, bicycle, jog, hunt, horseback ride. I am quite certain most of these folks have no idea what is possibly going to happen as it has been kept very quiet to the general public.	I feel it is imperative to keep all current activities as is. Limitations of any sort in unfair to the residents in our area that expect to be able to have use of their public land. I would like to see better "policeing" of the motorized vehicles so the of rest aren't ruined, they need to be on the main roads, but not cut-off completely. I would like grazing to be re-introduced to our immediate area.	The Forest Service has done a fine job of management for many years. I am very concerned about a p0ossible change to National Park Service. I don't believe they would have the man-power, finances, or capabilities of handling such a vast area. Free protection is a major concern of mine. Also Arizona Game and Fish should keep control. We have huge elk populations that without hunting would explode to unhealthy herd levels. The vegetation & animals would likely	I would like to see a conservation area instead of a parkland. This would be the "best of all worlds" for all people/animals/plants involved to maintain what we've got, preserve it for the future and let anybody enjoy!

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			suffer if there is no hunting allowed.	
112	I live right in the middle of the expansion area. We have the Forest Service land in front of.. And behind our property on Old Walnut Canyon Rd. Our current house was the head quarters of the Fish Ranch Est. in 1914. We have lived here for 34 years.	I think all of the current recreational activities are wonderful. We have tons of hikers, runners, bike riders, horseback riders, an on occasional RV. Bow hunting is great, too. Our whole community seems to enjoy this area year wound and we have found them to be very respectful of the area.	I don't see any problems or concerns right now other than perhaps that of future development. I am totally against the expansion of Walnut Canyon National Monument. This would endanger much of Flagstaff if the Park Service was in charge of fire prevention. The study lands come very close to looking like a land grab by the Park Service. There is no logical reason to expand the boundaries of Walnut Canyon National Monument.	If the National Park Service were to become the managers of such a large area it would probably mean many of the activities we now enjoy would disappear. This would be very sad for the residents that reside in the neighborhoods as well as those who come to Flagstaff for recreation. We are a tourist community and believe me, this would eliminate a large number of outdoor activities currently enjoyed by many. With government emphasis on healthy life style, it seems it is part of their duty to provide healthy recreation available at no cost for all.
113	Campbell Mesa is an excellent area for non-technical mountain bike riding. There is no place like it nearby. Please do not impact this area.			maintain free access to hiking-biking trials that go from entrance to Campbell Mesa (across cemetery) all the way to the Arizona Trail. Remain open to horseback riding in area of Campbell Mesa and the land between Old Walnut Canyon Rd and I-40. Continue to keep this area closed to motorized vehicles. Ensure the are no Forest Service land exchanges to permit development. Provide a public comment period after each stage of the draft

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114	It is close to town, good access, and provides areas to walk, hike and bike, ski (XC) and the opportunity to see wildlife	This area should remain open to all those activities mentioned above. I would prefer it is not open to motorized vehicles. But I know that will not happen. There many more roads in the area than there needs to be and some of them should be blocked off. Off road vehicle travel should be banned. It may be that it is banned now, but this is widely ignored and not enforced.	I don't want to see commercial logging in the area, the old growth should be allowed to stay. Any thinning projects could be opened to firewood gathering (after being thinned) to cut down on the amount of field slash that is burned. There should be no houses of buildings allowed in there...EVER. I'm not sure exactly what designation this should be called, but I think it should be part of Walnut Canyon Nat. Mon. "Nat. Rec." site will not cover it. There are many early Native American sites throughout the area, These would be destroyed by unregulated use. Some are now destroyed.	Most important is to close the area to development, no houses or new roads. Many existing roads should be blocked off, off road vehicle use should be limited.
115	Pristine birding habitat	birding, guided bird tours		Protection of any and all areas associated with the study area. No commercial development.
116	(part of comment form was torn off) I own private property next to the Walnut Canyon at Marshal Lake. I also own the Walnut Canyon cattle allotment		I hope they will still allow cattle grazing	We would like to see the continuation of a healthy forest along with multiple use.
117	Highly diverse environment of mesas, valleys, cliffs - high biodiversity, great hiking near big city.	All recreational aspects with very limited motorized access.	Biodiversity	analyzing options to prevent development of any type.
118	Important because its the closest land to precious Walnut Canyon which if you'd ever been there is quiet priceless, plus so close to a small city - this is special - seems like we just went thru this whole process a few years ago didn't we? What changed?	Off-road vehicles continue to be operated by zeros who think its all theirs to destroy. Keep them out. Babysitters are needed who actually patrol & who are able to enforce codes w/ tickets.	All resources in area should be protected. Duh. Do we really need hunters in this area? There are many fine animals in the area - they seem to like it there. (You left out javelina in your newsletter)	See above. I'm a little fuzzy on current management. How is this land being "managed"? I've never seen a ranger in the area except at the visitor center collecting fees. Thanks for your time.
119	Because Walnut Canyon is "my backyard"	Hiking and Biking Trails, Keep it all closed to vehicles	Forest thinning resources	To annex the State Trust Land Section 20 to allow a buffer between houses and Walnut Canyon
120	I have visited this area during the 30 years I've resided in Flagstaff. I've hiked & cycled in the area. This area is important because of the geology , flora, fauna, the water shed and archaeological resources. It is close to the city - closer & closer, which threatens everything valuable. Allowing development to encroach on	Minimal impact= hiking, cycling on trails, horseback riding - these types of LOW IMPACT uses should be maintained. Motorized vehicles (trucks, cars, motorcycles, quads, snowmobiles, etc.) disturb wildlife, can damage the land & should be at	The study needs to document for Congress what is here - they do not know why private citizens, residents have worked for decades to protect the area. The study needs to make it crystal clear why locals gave so much to protect the area.	I believe the study area would be best managed by adding it to the monument - managed by the NPS. Their mission is more focused on resource protection & recreation/education than the Forest Service or BLM. The NPS

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	this area will result in irreversible damage. This area is important for its own resources but is also a buffer for the established monument. Use has increased over the years & we need to protect the resources from - us- human caused damage.	least minimized or excluded (there is ALOT of forest service land adjacent that is not as sensitive.		would protect the Walnut Canyon area - forever.
121	I reside in the center of the study area. I use the study area land on a daily basis. I remember the last expansion of the "Monument" and the land that was taken from public use. I would object strenuously to the confiscation of further acreage. Along with the loss of personal use, any additional taking of property by the "Monument" would have an adverse affect on my personal property value.	All individual "free" uses should be considered. Many, many people use the study area land for hiking, hunting, horseback riding, jogging, bird watching. Any area that would be added to the "Monument" would result in fencing the current users out of the area and in effect steal land from those who's taxes pay for it.	I don't believe that anything other than restricting motorized travel should be considered for the study area. It's current use accommodates the largest group of users. Leave it alone.	Remove all but the "trunk line" roads within the study area. Allow the broadest possible uses within the study area. Add Section 21 to the study area and consider it for perminente protection.
122	It's been an excellent buffer between urban and surban sprawl. It's an area that has old growth P. pine trees, a natural area with wildlife and Mexican spotted owl. The study area may become part of Walnut Canyon Nat'l Monument which would protect it from development of any kind.	Hiking, biking, horseback riding and viewing of birds and other wildlife. Maintain as a natural area. It's useful for educational study trips by schools and other organizations.	Old growth trees, riparian recharge to water resources. Do not thin or manipulate trees at this time. Wait until a decision is made on inclusion or exclusion of this area into Walnut Canyon Nat'l Monument.	Flagstaff thru roads or alternative traffic routes should not impinge on this study area as it may reduce the quality of usefulness for natural area.
123	It's close to town, easy to use for dog walking, hiking, biking, without having to drive far to get to it. Just think how important central park is to NY City.	biking, hiking, dog walking		Keep Campbell Mesa & rest of area between Old Walnut Canyon Rd & I-40 undeveloped. Also an important elk calving area.
124	We are property owners (5.23 acres) on Old Walnut Canyon Rd. During the 23 years we've lived here, the traffic volume has increased dramatically, resulting in speeding, drinking, major accidents, and deaths. The road is poorly maintained and hazardous to bikers, pedestrians, and other vehicles. The monument must be protected but I have major concerns that the "special study area" has grown and expanded several times since talks began (1992-1996, 2002, 2004, 2006 & 2008)	Visitation at the Walnut Canyon National Monument and visitor access to the sites and trails. Educational school trips and programs. Hiking, biking, riding in area. Continue public access and continue grazing & land use permits. Full access to our private property with no restrictions	The monument and its original boundaries, the cultural & archaeological resources, on and adjacent to the monument. US Forest Service should establish a national conservation area and maintain its present role assuring continued public access to the area, grazing permits, and not relinquish site/region to national park service	Evaluation/impact of continual public visitation. Guarantee public access to area in perpetuity so land is protected. National Park management spells "limited to no access, permits/fees, limits to Arizona trail travel through area - "more expansion" - control!
125	I have lived here for 35 years and know the area and land management issues well. I hike a lot and am a science educator.	Wilderness designation for much of the monument	forestry management should be intensified to preclude catastrophic fire	I think that WACA should be enlarged in size to include both sunset crater NM and Wupatki NM and be called Sinagua National Park.

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126	Also historical archaeology. My husband and I are very familiar with the area between the Southside of the canyon and Lake Mary Road and between Marshall Lake and the east side of the canyon. This is a very special area, containing a beautiful section of the Arizona Trail with huge alligator junipers and mature yellow pine stands. In additional, there is an area on the rim and close by which is old growth & has never been cut. There is important (XXX?) owl, spotted owl, and goshawk habitat as well as many other birds and mammals here.	Hiking, horseback riding, bird watching, maintain biking,. I would hope that the above area would be closed to motorized travel because of its very special qualities.	Wildlife and wildlife corridors, non motorized recreation, saving old growth and large tree stands of P. Pine - also oak and juniper pinion & wildflower meadows & water sources	Coordination between state and federal lands in land use to protect archeological & wildlife resources and habitat.
127	My family has a forest allotment within the study area located on the north side	That people are able to hike, bike, ride horses, and hunt	Personally, my concern would be that if the study area were put under poor management, they would eventually fence us out as they have done in the past. To lose more grazing land from out allotment would be catastrophic, forcing us to run less numbers, producing less profit in a business that is already very financially challenging.	I think it would be in the best interest of most people concerned to put this area as a National Conservation Area remaining under the jurisdiction of the Coconino National Forest Service for several reasons; these include: Allowing people more freedom on the land. protecting the land from being subdivided or developed, grazing would remain as it is, the land would continue to be multi use and hunting would continue as is.
128	I believe that no changes should be made to the Walnut Canyon National Monument boundaries. We have more people today wanting access to their National Forest Lands than at any other time in our history. We do not need to limit access or usage of our National Forest Lands. The designation of this additional 30,000 acres to National Monument status is not acceptable. This is the most ridiculous proposal that I have ever seen. The location, the proximity to the city, and the size should never have been proposed let along actually considered. These lands were set aside for the people for our Multiple Use Sustain Yield. Tell Washington NO and also tell them to BACK OFF.			

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131	The Area is my prime recreation area on a frequent basis. I visit it for hiking, birding, wildlife viewing, limited road driving and for quiet. The open space and beauty are greatly appreciated.	Hiking, wildlife viewing, photography. The many varieties of open space that includes local biota and views of the Canyon and forest.	Open space, recreational opportunities on a wide spectrum. Wildlife. Plant life. (endemic and rare species) and the qualities of a buffer for protection of archaeological and natural qualities.	The Area should be examined for all of its recreational values and as an open space buffer that precludes development and offer protection t Walnut Canyon Monument. Many parts of this area would qualify for federal status as a protected area under NPS or USFS management.
132	I hike at this area almost every day & I snow shoe in the winter. I like that this area is non motorized and within a short distance from my house. I also like the loop of a variety of distances.	non-motorized, walking, biking, horse trails	I'm not sure	maintain free access to hiking-biking trials that go from entrance to Campbell Mesa (across cemetery) all the way to the Arizona Trail. Remain open to horseback riding in area of Campbell Mesa and the land between Old Walnut Canyon Rd and I-40. Continue to keep this area closed to motorized vehicles. Ensure the are no Forest Service lands exchanges to permit development. Provide a public comment period after each stage of the draft.
133	The area contains some good grazing land and is used by hunters and wood cutters. The land is also used by hikers, trail riders, bikers, and has some great bird watching.	All uses now these should be left i.e., the future uses	Listen to the majority of the people who use the land	The conservation and multiple use views should be used.
134	Maintain free access to the hiking-biking trails in the area between Old Walnut Canyon Rd & I-40. No development. Land exchanges or motorized vehicles			maintain free access to hiking-biking trials that go from entrance to Campbell Mesa (across cemetery) all the way to the Arizona Trail. Remain open to horseback riding in area of Campbell Mesa and the land between Old Walnut Canyon Rd and I-40. Continue to keep this area closed to motorized vehicles. Ensure the are no Forest Service lands exchanges to permit development. Provide a public comment period after each stage of the draft.

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135	It's important because it's a rich & diverse area (archaeology, biology, geology, wildlife, etc) close to a major city. And it's beautiful. There is old growth ponderosa in the area - a rare resource in the Flagstaff area.	Hiking, bird watching, jogging, horse back riding, should all be maintained. Some bicycling should be allowed, but not everywhere because 1) bicyclists often barrel down trails & almost run over other users, and 2) bicyclists are building too many illegal trails all over Flagstaff - they can't be trusted.	Archaeology is #1. But all resources should be protected. The area should be managed to keep it as wild as possible, and as untouched as possible. Please don't go building roads & buildings is there. I read there was a plan to put major arterial roadways in the area. This would be a huge mistake!	The Walnut Creek watershed should be protected. Bottom line - Please keep this area as wild and as natural as possible. If necessary, keep people out, just do what you need to do to protect the land and resources. Thanks
136	(This comment form was partial destroyed in the mail) The study area is a large amount of primitive land and would be a gift to all people if it is preserved. The larger the area preserved ….. The more likely many species can …… take advantage of this opportunity.	not legible	not legible	… study needs to address hunting which I … should be allowed only if necessary. I opposed cattle grazing.
137	My wife and I hike in the Study Area four or five times a week. I ride my horse there three or four times a week. That's the direct personal benefit. But the Study Area's important and special character lie deeper, too. The Area Provides wonderful National Forest for everyone right next to Flagstaff's Urban Growth Boundary. The canyon itself (west of the WCNM boundary) provides exceptional habitat for peregrine falcons and spotted owl. Above the rim, I see a goshawk every two years or so.	The public dialogue in 2002 culminated in a "List of Public Uses" (Exhibit D of the joint City-County resolution of December 2002). I view *all* of those current public uses as activities that should be retained in the Study Area. For special emphasis, I select hunting, livestock grazing, mountain biking, hiking, and horse back riding. Some of these items are hot button items, but they have been pursued for decades in a *sustainable* fashion. The personal views of several individuals or organizations should not be allowed to disfrachise the general public. *In short, if it's sustainable, keep it.*	With only one small exception, the Forest Service land within the Study Area is typical contemporary ponderosa forest or pinion-juniper forest. A few areas have a substantial number of (almost) old-growth ponderosa pines, and those areas have a low umber of density of trees, making them good reminder of what the pre-Anglo-settlement forest looked like. Those area are lovely, but - also - they are not threatened by any local human action; so one can just leave them alone and enjoy them. In short, they need no special treatment it the study. The "one small exception" consists of the western inner canyon, the land below the rim of Walnut Canyon between the western boundary of WCNM and the meadow below Fisher Point. That area - cool and full of Douglas fir on the canyon walls - provides priceless habitat for peregrine falcon and spotted owls. Currently, however, the Forest Service doe as fine job of managing the area. Traffic more that a mile into the area (from the west) is rare. In my view, the Special Study need not devote attention to the western inner canyon.	The City-County joint resolution of December 2002 captured the community's goals exceptional well. I think it fair to encapsulate those goals as follows. *In perpetuity.* Protect the land an resources of the Walnut Canyon Study Area in perpetuity (with development being a major threat). *Current Uses goals.* Maintain current public access and uses. As I see it, your job is to find one or more management options that meet those twin goals (and that are politically viable.)For all practical purposes, the Study bill signed by President Obama in 2009, which is your governing document, set the same goals. I would note that the word "land" in the community's first goal must mean primarily the federal land currently managed b y the Forest Service. A bit over three section of State Trust land lie within the Study Area, and most of the community would like to see all that land protected from development also. That's a special challenge, but not one that you

	QUESTION 1 (WHY IMPORTANT/SPECIAL)	QUESTION 2 (RECREATIONAL/VISITOR OPPORTUNITIES	QUESTION 3 (RESOURCES)	QUESTION 4 (MANAGEMENT ISSUES)
			After Congress has determined the land designation for the Study Area and selected the managing agency, an initial management plan will be developed (with participation by community). At that time, the western inner canyon can be reviewed. As I see things nothing different need be done about that area until - alas- the population of Flagstaff increases further and more persons penetrate the canyon. You will surely address archaeological resources on the Forest Service land within the study area/ The professional archeologists with the Forest Service, the NPS, and the Museum of Northern Arizona know a great deal about the Study Area, and the Forest Service has some surveys, often done in connection with timber sales or roads. Fore more than a decade, I have hiked and ridden my horse over the portion of the Study Area north of Walnut Canyon. I have notice a number of archaeological sites - identifiable by pottery shards or crumbled rock walls. Some sites have the little aluminum tag that the Forest Service uses to mark a registered site; others seem not to have been recorded. The Coconino National Forest has more than 9,000 registered archeological sites, and so it's no surprise that some fall within the Study Area. From my own observations and for conversations with some Forest Service archeologists, I conclude that the Forest Service land within the Study area contains no exceptional archeological sites - and certainly none of "national significance." Of course, that's am amateur's view and based on limited data. But in support, I note here that the NPS's internal document, Walnut Canyon National Monument. Proposed Boundary	need to address. There may yet be successful state-wide attempt at reform of the State Land Trust, the outcome of which will be that Sections 22 and 28 become protected without cost. Section 30 and the sliver of Section 10 will probably require purchase in order to be protected. But, as I said earlier, that not a issue that need occupy you. Separately, I will submit a proposal for management option that, I believe, meets both of the City-County goals. Unless you spend a lot of time searching old copies of Arizona Daily Sun, you will not know some of the insightful statements that were made in 2002. I will close by typing two of them here. What Sam Henderson hears "We like it the way it is - and how can we keep it that way forever." - Sam Henderson at City-County Joint meeting, 12 February 2002, according to my notes. At the time Sam Henderson was Superintendent of the Flagstaff Area National Monuments. The area doesn't have to become a park, Henderson says, to be managed effectively for the resource values at hand. "There are endless opportunities for compromises," he said. "There are alternatives that require no expansion at all." - article by Anne Minard in Arizona Daily Sun, 13 February 2002.

	QUESTION 1 (WHY IMPORTANT/SPECIAL)	QUESTION 2 (RECREATIONAL/VISITOR OPPORTUNITIES	QUESTION 3 (RESOURCES)	QUESTION 4 (MANAGEMENT ISSUES)
			Expansion: Area Required for Long-Term Protection of Walnut Canyon "Environment," a draft of which was dated November 2001, scarcely mentions archeological resources in the area outside the current WCNM.	

ATTACHMENT 2: WEB SITE RESPONSES

COMMENTS	ATTACHMENT
The Walnut Canyon Nation Monument is a wonderful amenity to Arizona and visitors of Arizona. It should be expanded. Within this area there are fantastic examples of Native American history that need to be preserved as well as the wonderful unique natural habitat of the area. This expanded area will provide a wonderful buffer to future development which if allowed into the study area will cause this wilderness to be lost forever.	
SAVE THIS AREA PLEASE! We have enough roads and homes eating up our green space and this is a special one it deserves protection SAVE IT SAVE IT SAVE IT!	
Why is this study area so large? I don't believe this entire area would qualify for inclusion as a National Park. Does the National Park Service have the budget to manage additions to the system?	
To Whom It Concerns: As a former intern at the Flagstaff Area National Monuments, and as a former resident of Flagstaff, would like to express my concern for the consequences of increased recreational and industrial development in the Walnut Canyon Study Area. In particular, I believe (and through on the ground experiences can affirm) that the land needs strong protection, either enforcing current rules or even possibly offering further protection from all types of development. For example: *The USFS and NPS lands both need to be surveyed for Wilderness character under the Wilderness Act of 1964. If they already have been surveyed, these surveys may still be current. In any case, this land that has wild character need to be considered, recommended, or proposed for Wilderness designation as is the mandate to each of the federal agencies (i.e. Wilderness Study Area). Under the WSA designation, the land is managed as Wilderness until Congress decides if it should or should not be such. *Grazing needs to be prevented from impacting any landscapes where it has not already existed. Current Grazing permits, especially on plots with archeological resources, should be sold back and eliminated where possible. The VAST majnority of ranchers in the west do not make their income off ranching. The other option is to charge these rancers the ACTUAL cost that it costs to maintain the area including water tanks, fencing, road maintenance, revegetation of damaged areas, etc. Current rates in the USFS often are heavily "subsidized" compared to these true costs that the agency faces. *Off-road vehicle (OHV), ATV, and other motorized uses need to be restricted to well-defined areas that are contained in one area and not spread out doing damaged over a massive area of publicly owned lands. Drivers have the right to recreate, and those that enjoy landscapes that are not scarred by OHVs etc. have the right to ensure the integrity of the lands that both of these parties share as American co-owners of public lands. OHVs should be allowed to travel on existing, designated routes that are not especially damaging to the archeological, ecosystem, or other cultural and natural resources. *I would like to encourage minimal trail development for any uses. Impacts should be concentrated in the case of biking, hiking, and other recreation use social trails. In areas where off-trail travel is damaging, informal trails should be closed off and mitigated for rehabilitation. Before any further trails are developed, they should be seriously considered not just whether we humans need them to recreate, but if they are truly appropriate and sustainable for the existing or ideal habitat. Thank you for evaluating and considering this input.	
My family and I love Walnut Canyon and consier it a local and national treasure. This beautiful place and important cultural resource deserves the highest level of protections. We support the expansion of Walnut Canyon National Monument and emphasize that any expansion area should have the same protections as the current monument. As a National Park Service unit, it should focus on resource protection per the National Park Service Organic Act of 1916. The Organic Act states: We do not think off-road activities, including snowmobiles, livestock grazing, hunting and target shooting, and other activities should be allowed within the Monument. Thank you.	
Please protect our play area. We hike out there avidly.	
I strongly support protection of the proposed study area and am very happy the study is finally being undertaken - thank you. I also believe the this area is deserving of the highest level of protection and therefore support management by the National Park Service.	
I have lived, hiked and ride my horse close to the Fisher Point area since 1985. The public use has increased yearly and it is a good thing. Now the public will comment on wanting to keep and manage the Walnut Canyon area for recreation and wildlife. I rarely see any trash or vandalism. Some of the trails have had maintenance and everything is in good shape. It will need to be continued as the usage increases. I used to live in the Phoenix area where forest areas increased in usage very quickly. Parking areas had to be created. Even pay to park areas had to be developed. This will be in the future for the Walnut Canyon area. My main concern for the Walnut Canyon study area is that it be kept in the most natural and wild state as possible. Also the area should be expanded and kept out of My main concern for the Walnut Canyon study area is that it be kept in the most natural and wild state as possible. Also the area should be expanded and kept out of the hands of developers. Hunting and Ranching should be allowed within the law.	

I'm wondering if Picture Canyon, slightly north of Walnut Canyon, can be included in the study. It currently is not, yet represents a high concentration of pre-contact petroglyphs in need of protection. I believe that this study represents a chance for the Coconino National Forest and the National Park Service to get creative about how to best protect these lands. The major objective is to protect the Study Area from development, yet based on the differing missions of the NFS and the NPS, we've had trouble agreeing on how best to protect it. Some might say that the NFS under-protects it currently, but that the NPS would overprotect it. It seems a good solution would be to overprotect some of the area (perhaps certain parts of the interior canyon itself) while continuing to allow hiking, non-mechanized biking, and horseback riding over the larger areas of the mesa. Whether or not this can be accomplished under NFS or NPS ownership is irrelevant to me. I personally work for the NPS, but also love to take my dogs hiking on the Arizona Trail in that area. I would greatly miss hiking there if it were closed off to the public. I also recognize, though, that certain archeological sites not in the NPS part of Walnut Canyon are not being well protected. There are also endangered species issues we need to consider.	
Please see signed copy of comments delevered to meeting at cromer school 04 22 2010. I cannot confirm if the pdf attachment applied. In case not please contact me, I will send it in US mail. Myself, and my entire family are opposed to the proposed expansion. Thank you.	Walnut-Canyon.pdf
In short, I support the expansion of Walnut Canyon National Monument. Furthermore, the expanded areas should get the same protection as the current park. This area is a wonderful asset to Flagstaff. I live in Flagstaff, AZ and visit Walnut Canyon fairly frequently. It is a jewel of a park. I take visitors there as well. Most recently I went there on a very windy day, just to get away to nature. In spite of the wind and the cold I found my spirit replenished. I have gone on tours to the bottom of the canyon and have entered the canyon from the west (?) end. I fell very fortunate to live so close to this monument.	
I studied the proposal and am violently opposed to the expansion of the Walnut Canyon national park. I find no legitimate purpose, historically, archeology, or any other reason to remove this area from the present custodians to the National Park Service. I live next door to the Walnut Canyon area and use this proposed area for personal use on a weekly basis.	
See attached file. Since some comment references to geography or roads may be particularly difficult to interpret, I am open to and available for telephonic or personal interview	Walnut-Cyn-Study-Input-Apr-10.doc
Why is thie study area important to you and what makes it special? Why is this area so special to Hitchin? Post???? As a public servant we have lived, breathed and cared for it for thirty years for all to enjoy My permit is 100% affected by this study. My permit and business is located entirely within the study area. The brochure I use to advertise my business has a picture of the study area on the front. The study area is everything to me and my business, and through my hard work in the area, caring for it and maintaining it through the years, and taking thousands of people int othe area to enjoy its natural beauty, the area has come to represent something very special to me, and something I will always value and protect. And interestingly, this area that was once scarred from over-use and poor use, that I, the Forest Service and others worked so hard over the last thirty years to protect and conserve, became so high value today that now others want to change the management? Why is this? It IS a special area, a wild and natural area so close to town? WITHIN THE CITY LIMITS OF FLAGSTAFF? And one that we have helped manage as such over these many years. As a Licensed Outfitter and Guide, Hitchin? Post Stables has produced quality recreation for people from around the world in this study area in the last 30 years. 30 years ago we started packing out trash around Fisher Point and working with the Forest Service to close roads that were allowing people to drive into the area and tear the side hills up with their four wheel drives and for homeless people to live and camp and leave trash, start fires and literally destroy the landscape. In consultation with the Forest Service we sandblasted graphite off the rocks at Fisher Point in 1988 and paid for the equipment ourselves. Hitchin? Post has held firm on the importance of Recreation in this area and helped to stop inappropriately planned timber sales, therby keeping the wild and natural look that it now has. The forest Service has gather input and listened to the demands of the public and Hitchin? Post representing people from all over the world, resulting to further protect the sensitive area which has became a Semi primitive non-motorized area, in Forest Service language. After closing more roads and trails we worked together to stop erosion which let grass and vegetation grow back to its national state, protecting meadows and draws within the study area. Hitchin? Post has always helped the land, building trails and always maintaining them for all to enjoy. Hitchin Post Stables has always educated the public on values and history of Walnut Canyon, sharing the history of the Anasazi Indians who once lived in the area. We have helped create noise pollution signs, have worked hard to leave no scars, and have taught our guests to only take memories from the land as we left each day. We have fought hard through the years with the Forest Service to enhance this area for all to enjoy, making it what some folks say today is National Park quality land. It is beacuses Hitchin? Post, working hand in hand with the Forest Service and others, has made this area the valued focal point that it now is. And by making this area non-motorized you and I can experience a very unique and wonderful area any time of day or night, and it sets right in the back door for all the residents of Flagstaff. ?My greatest concern would be the National Park Service would limit our use as it is now. This could effect our over night pack trips that start from the Marshal Lake area and ends up at our Wagon Train campsite above Fay Canyon.	

This has been one of our main rides through the years, giving our guests a wilderness experience that can only happen with the area staying as is. For example, consider what the National Park Service has just proposed and is implementing at the Grand Canyon ? Removing outfitter and guide mules from the trails to Phantom Ranch ? It is happening right now. While I understand the logic of protecting the land, this is taking away a one hundred year old operation on public lands that the public appreciates and benefits from, proving the NPS is ready and willing to make such changes. How many folks around the world can walk out their back door onto public land that is this wild and beautiful and enjoy it to its fullest without having to get a permit from the National Park Service? Or be controlled by where and when you can go and enjoy it? The National Park Service mission is to preserve, protect and in most areas are drastically reducing the entry of people, thinking this is the answer to preserve; whereas the Forest Service mission is to Care for the Land and serve the publoic providing recreation and conservation for all to enjoy - to work with outfitters providing a service for the public and to work together to enhance the land. The history of the National Park Service has been to eliminate permits as mine. Just call the outfitter Guide Service in Yosemite National Park or any other outfitters in any state and hear their problems and facts about eliminating them all together! What Recreational/visitor uses do you think should be addressed by the Special study and maintained in future options? As Flagstaff grows in the future, non-motorized uses such as hiking, horseback riding, cycling, and climbing management should be emphasized for the Walnut Canyon study area. Would more restrictions be added to this area from the National Park regulating the freedom for these uses we now have? One concern is my entire operation could end up in the National Monument, under National Park Service rules and regulation, resulting that my business and all general public would be severely curtailed and regulated in terms of how and when anyone may enter this area. What resources do you think should be addressed by the Special Study? Uses and values that should be addressed in this study include archaeological evaluation and preserveation, wildlife management, economic benefits, natural ecosystem restoration, and wildfire management. Is it not the open space that draws tourists to this area and stimulates the economy? 75% of all flagstaff employment is by tourist related businesses. By my experience in the last 30 years the Forest Service has worked diligently together with Hitchin" Post to improve this area to meet all needs for all resources. We have always kept a working relationship to benefit all public use and have included all wildlife concerns. Hitchin? Post has roughly generated for the Flagstaff economy 3 1/2 to 4 million dollars during these past thirty years. We have generated work for many people and paid taxes and Forest Service fees throughout the years. The majority of our guests have spent the night in flagstaff generating income for hotels and restaurants and spent money ini many other areas. All have come to enjoy the serenity and peace of Walnut canyon Area. The archaeological, wildlife and other natural resource values of this area are extremely high, which goes wihtout saying. What other management issues do you think should be addressed by the special study? Could the National Park work with the Forest Service to further protect the archeological sites outside the current boundary of Walnut National Monument? Could management policies change to benefit all? I feel the Forest Service has proved itself in managing this area properly working with all, listening and always adjusting to growth and the needs of all resources concerned. Keeping this area to what it is now which draws people to enjoy all recreation to it fullest in a non-motorized semi primitive area what is needed today in order to maintain this quality resource for current and future generations. Hitchin? Post together with the Forest Service has implemented a plan for fire control that has worked for years during fire season. Hitchin? Post monitors this area and has actually called in and prevented what could have been 3 major fires just in these last few years. Again, always working hand in hand with the Forest Service. It makes no sense to fence this area in under National Park Service rules and regulations. It might not ring true with some folks, but to those of us that know what makes grass green it makes ploenty of sense to keep the area as is. Otherwise, those of us who understand the difference will certainly plan to fight hard again for this special area that we've worked so hard to protect over the years. PLEASE MAKE MY COMMENTS A PART OF THE OFFICAL RECORD FOR THIS PROJECT, AND PLEASE KEEP ME INFORMED AS THE ANALYSIS PROCEEDS. Thank you for your time	
I was born and raied right next to the study area and have always hunted, camped and cut wood in that area. There is no reason to expand the Park again. When people come to visit this park it is to hike the trails at the visitor center and see the Indian Ruins. I am currently a scoutmaster that very frequently takes the boys into the study area to; mountain bike, rock climb, ride the trails on horses or hike the trails. It is obsurd to think that if the management is turned over to the Park that they will continue to allow these activities, they might say they will but it will never happen. It is also amazing that a small group of people (Friends of Walnut Canyon) can push this so far as to have us the tax payers pay for all these studies for something that should never take place. If they are worried about the development of State Land they have as much right to buy the property just like a Developer. The public ofrest is OUR forest and we can not enjoy it if it is managed by the Park. I can't believe we have wasted as much tax payer money as we already have to get this far. Stop the madness	
I am very supportive of expanding Walnut Canyon National Monument. Expansion should have the same protections as the current monument. As a National Park Service unit, it should focus on resource protection. This should mean that resource protection supersedes recreation and only recreational uses that are compatible with resource protections should be included in the Monument. Please do not include off-road activities, including snowmobiles, livestock grazing, hunting and target shooting, and other activities that are incompatible with the Monument.	

I strongly support the expanding of Walnut Canyon National Monument that includes the sameI strongly support the expanding of Walnut Canyon National Monument that includes the same protections as the current monument. Focus should be on resource protection that supersedes recreation and only uses recreation that are compatible with resource protection should be included. The focus of the study should be resource protection and uses that are consistent with a National Park Service unit and should not include off-road activities, including snowmobiles, livestock grazing, hunting and target shooting, and other activities that are incompatible with the Monument. Also, I strongly recommend Section #20 be included as a buffer zone for the Monument. protections as the current monument. Focus should not include off-road activities, including snowmobiles, livestock grazing, hunting and target shooting, and other activities that are incompatible with the Monument.	
Thank you for the opportunity to comment as part of the Walnut Canyon Study process. Background: Flagstaff Biking Organization is a group of cyclists who came together to ?promote bicycling as a safe and attractive means of transportation and recreaation in Northern Arizona.? Our initial project was to put on a Bike to Work Week for our community in May 2002. Building on the success we started to expand our efforts to keep people informed of cycling related issues and galvanize support for better and safer facilities, trails, and trail access. We have been involved with input on the Walnut Canyon area since 2002. We have assisted in the construction of the Campbell Mesa trails and in maintenance of the Arizona Trail in this area. We proposed the Flagstaff Loop Trail, which is now set for alignment and partially constructed through this area as well. Our primary concern is that bicycle access continues as it has in the past within the boundaries of the Walnut Canyon Study Area. Some of the most popular trails for mountain biking in the Flagstaff area are within these boundaries. The Campbell Mesa trails provide a beginner to intermediate riding experience that is not as common in the Dry Lake Hills or Fort Valley areas adjacent to Flagstaff. The Arizona Trail offers a unique canyon rim riding experience, distinct from the mountain trails nearby. The Arizona Trail also provides connectivityy for an unparalleled opportunity to ride from the Mexico border to Utah. Once finished the Flagstaff Loop Trail will create connectivity to trails offering opportunities for non-motorized transportation and recreation between the City of Flagstaff, Flagstaff Urban Trail System, (FUTS), outlying neighborhoods and the surrounding National Forest Lands and Forest trail systems. Difficulties with Park Service management We have strong concerns with the designation of any of these lands as National Monument or National Park. Designations that would entail Park Service management are apt to be problematic for bicycling. We are concerned that Park or Monument designation would present legal problems for trails being designated open for bicycle use. Currently changes are being made to pilicy that should allow for bicycles to be permitted on some existing trails in National Parks through a regular NEPA analysis, rather than through a Special Regulation coupled with NEPA. These changes would still not allow new trail to be constructed with bicycle access in mind. Although we have no intention to push for significant expansion of the existing and planned trails within the Study Area, we do think it may be appropriate in the future to provide connector trails between as of yet to be constructed FUTS and the Flagstaff Loop Trail. Park or Monument designation could create insurmountable barriers to this. We also do not believe that the Study Area is worthy of National Monument or National Park designation. Monuments and Parks are ?America's Best Places?. Although the Walnut Canyon Area outside of the current Monument boundaries is quite beautiful, and marginally unique to the immediate Flagstaff area, it lacks the specific significant criteria for National Monument or National Park status. Regardless of the legal ramifications of bicycle access to National Park or Monument lands, the National Park Service does not focus on the unique aspects of trails constructed with bicycles in mind. Mountain bikers in Flagstaff seek a diverse range of experiences provided for by different parameters for trail construction than those typically employed by the National Park Service. We don't believe that these types of experiences are best addressed by Park Service management. We are concerned that trails are currently free to ride may become part of a fee area, as Walnut Canyon National Monument currently is. Preferred management option This noted, we do support the need for a stronger level of protection of this landscape than is currently offered under the existing management plan. We recommend and support the proposal being forwarded by Ralph Baierlein for the Walnut Canyon Study Area to be proposed for designation as a National Conservation Area under Forest Service management. It is our contention that a National Conservation Area would provide both the permanent protection from development many Flagstaff residents support and the flexibilitiy in management necessary to provide for the multiple user groups who enjoy and recreate within the Study area. We support management by the US Forest Service because we see that this agency possesses to necessary expertise to manage for these multiple uses, and specifically bicycling, in an appropriate manner. We appreciate this opportunity to comment. Please feel free to contact us should you have any questions regarding these comments. We formally request to be included in any correspondence on this process both electronically and on paper. Sincerely, Anthony Quintile, for Flagstaff Biking Organization Board of Directors	FBOWCSAcommentschanged.doc
First of all, I would like this study stopped since it's costing millions of tax dollars taken from people already taxed to death. I say leave the National Parks the size they exist currently because all I hear lately is how much it cost to maintain them, again with some tax dollars along with the increasing entry and usage fees. Once a piece of land is designated National Park it has lost almost every use it ever had by leaving viewing and walking around as the only activities allowed, and you must pay through the nose to do even that! If for some reason the current administration feels the need to spend more that they already have, I ask they put dollars into public safety, education and one area they've failed miserably at is protecting our national borders (currently Arizona is catching hell for attempting to do the Feds job for them in this arena).	

I am concerned that if the NPS gains management control of the proposed area that access will be dramatically restricted. I do not support managing the study area in the same way as Walnut Canyhon National Monument this is due to the fact that 1. There is no access to any backcountry use by anyone who is not affiliated with the monument and I currently enjoy hiking in that area 2. I am a mountain biker and I make frequent use of the trails in that area and have done so for years, the NPS does not allow bikes on any of its trails and I do not want to lose access to the AZ trail, the flagstaff loop trail and the campbell mesa trail system.	
I am writing with concerns regarding the new "study" area proposed for the Walnut Canyon area. I have been a life long resident of Flagstaff and enjoy all that our NF has to offer. The history of protection of green belt areas in Flagstaff gives me concern to the validity of a study area. Lockett Ranches, Cedar Hill, Pine Canyon,and Flagstaff Ranch are alll examples of land that should have been preserved but were lost to development. I see no reason to believe that the same thing would not happen to this area with a "landswap" in the future. This area provides incredable recreation and open space to the Flagstaff community. I would only be in favor of complete protection of this area. This would include the inability for our government to sell or trade this land for more "desireable" land in the future. I believe keeping these lands open for public use and enjoyment is paramont to the growth and health of our community.	
RE: Walnut Canyon Study Area Special Study DATE: May 7, 2010 To Whom It May Concern, The Arizona Game and Fish Department wishes to respectfully submit the following regarding possible management options for the area surrounding the current Walnut Canyon National Monument (i.e. the Walnut Canyon Study Area, WCSA): 1. The Arizona Game and Fish Department (AGFD) supports management options for lands within the Walnut Canyon Study Area that will ensure the protection of this area from development in perpetuity. 2. AGFD supports continued mixed recreational use with the WCSA, including hunting and other appropriate uses (e.g. wildlife watching). The Department has determined that hunting, particularly on Coconino National Forest lands in those portions of the Study Area south and southwest of the current National Monument, functions as an important tool for wildlife management and for minimizing urban human-wildlife conflicts in areas such as the neighborhoods adjacent to Continental Country Club. Hunting in the WCSA regulates the elk herds that regularly move into the Continental area, causing damage to the gold course and homesites and producing frequent and unpleasant close encounters with residents which the Department is often called to address. 3. The preference of AGFD would be continued U.S. Forest Service ownership and management of the greater WCSA lands outside current Monument boundaries, though the Department could also support National Park Service management provided continued support for items #1 and #2 above. In particular we would advocate for the continued allowance of hunting in the WCSA. Hunting is allowed in various other National Park Service units in the United States by federal statute, and can thus be compatible with a range of other recreational uses and aesthetic values associated with National Parks if appropriately regulated. 4. AGFD encourages the Walnut Canyon Special Study to explore the idea of creating a Walnut Canyon ?National Conservation area? (NCA) or some comparable arrangement as a possible solution to management of the WCSA. This alternative was proposed to the Department by a local citizen and has been used as a management model for many Bureau of Land Management lands. NCAs can accommodate hunting (e.g. Gila Box Riparian and Las Cienegas National Conservation Areas in Arizona) and ensure protection of the WCSA from development in perpetuity, and the Department advocates that both of these conditions be included if National Conservation Area designation is pursued. 5. If a National Conservation Area or similar management alternative is considered, the Arizona Game and Fish Department advocates the possible inclusion of Arizona State Land Department (ASLD) sections within the WCSA as part of the NCA. In the aforementioned citizen?s proposal to Arizona Game and Fish (see item #4), it was recommended that ASLD would ?retain all rights to its lands within the Study Area.? However, the Department does not support the latter provision. AGFD views the potential for urban development on the included ASLD sections as one of the principal threats to the ecological integrity of the WCSA, and development on these sections could also lead to an increase in human'wildlife conflicts as described in item #2 above. Possible mechanisms for acquiring ASLD sections in the WCSA could include exchange for less sensitive USFS or NPS lands elsewhere, or reclassification for conservation purposes through the Arizona Preserve Initiative and subsequent purchase at ASLD auction. 6. AGFD supports managed OHV use in the WCSA, preferably as described in the Coconino National Forest?s revised Travel Management Rule. The revised TMR allows for the restricted use of OHV?s by hunters for retrieval of downed and tagged game animals only, and does not permit general OHV access for scouting or hunting. The Department is concerned that a total ban on OHV use would lead to a decrease in the number of elk taken by hunters and an increase in the elk population in this area, leading in turn to more human-wildlife conflicts as described above in item #2. AGFD would consider alternatives to TMR implementation for selected portions of the WCSA, if for example it were shown that OHV use presented the clear potential for damage to critical ecological and/or cultural resources there. The Arizona Game and Fish Departmewnt wishes to acknowledge our appreciation for this opportunity to provide input to the Walnut Canyon Special Study. Please do not hesitate to contact me if you desire further information or clarification. I have attached these comments as an MS Word file as well. Thank you for your consideration. Sincerely, Mark Ogonowski Wildlife Specialist II? Urban Wildlife Planner Arizona Game and Fish Department Region 2 Office 3500 S. Lake Mary Road Flagstaff, AZ 86001 928-214-1252	AGFD0Comments-on-WCSA_Mogonowski_7May10.docx

As a resident who leaves in the vicinity of the Walnut Canyon Monument, I am extremely supportive of expanding Waln ut Canyon National Monument and emphasize that any expansion area should have the same protections as the current monument. As a National Park Service unit, it should focus on resource protection per the National Park Service Organic Act of 1916. The Organic Act states: The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purposes of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. This means that resource protection supersedes recreation and only recreational uses that are compatible with resource protection should be included in the Monument. The focus of the study should be resource protection and uses that are consistent with a National Park Service unit and should not include off-road activities, including snowmobiles, livestock grazing, hunting and target shooting, and other activities that are incompatible with the Monument. The lands being considered for the Monument expansion will enhance the values of Walnujt Canyon National Monument because of the significant wildlife values including Mexican spotted owl (Strix occidentalis lucida) and northern gowhawk (Accipiter gentilis) habitat. The Mexican spotted owl is a threatened species pursuant to the Endangered Species Act and this area contains five Mexican Spotted Owl Protected Activity Centers. Protecting this area under National Park Service mandates will better protect the owl and its habitat. The proposed expansion area is also home to six northern goshawk post-fledgling areas. Including these areas will help better protect this sensitive species. The area also has significant tracts of old growth. Thanks to one hundred years of logging and cattle and sheep grazing, 98% of southwest old growth ponderosa pine has been liquidated. Protecting these remnant old growth tracts presents additional justification for protecting this rare and sensitive habitat under Park Service management. Thank you for including my voice in your endeavors. We have an obligation to protect what can never be replaced.	
I am supportive of expanding Walnut Canyon National Monument and want to stress that any expansion area should have the same protections as the current monument. As a National Park Service unit, it should focus on resource protection per the National Park Service Organic Act of 1916. The Organic Act states: The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purposes of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. This means that resource protection supersedes recreation and only recreational uses that are compatible with resource protection should be included in the Monument. The focus of the study should be resource protection and uses that are consistent with a National Park Service unit and should not include off-road activities, including snowmobiles, livestock grazing, hunting and target shooting, and other activities that are incompatible with the Monument.	
I support expanding Walnut Canyon National Monument. Any expansion area should have the same protections as the current monument. As a National Park Service unit, it should focus on resource protection per the National Park Service Organic Act of 1916. This act specifies that resource protection supersedes recreation and only recreational uses that are compatible with resource protection should be included in the Monument. The focus of the study should be resource protection and uses that are consistent with a National Park Service unit and should not include off-road activities, including snowmobiles, livestock grazing, hunting and target shooting, and other activities that are incompatible with the Monument.	
I support the expansion of the Walnut Canyon Monument. I have hiked in many parts of this area, including campbell mesa, Sandy's canyon, and Fay Canyon. I feel this area has great environmental value, since it has old growth ponderosas, spotted owls, and goshawks. It also has archeological significance. This area is one that we hike when the peaks are too windy or snowy. I live near the cinder lakes, an area where the forest has been torn up by ATV's, and where the motorized access has caused the forest to be littered with cans and bottles. I would not want to see Walnut Canyon suffer this fate.	
Dear Superintendent Chung and Supervisor Stewart: I am writing on behalf of the Sierra Club?s Grand Canyon Chapter and our 12,000 members in Arizona to express our support and some of our concerns regarding the Walnut Canyon Study Special Study recently initiated by the U.S. Forest Service (USFS) and the National Park Service (NPS). This joint study of about 31,000 acres adjacent to the Walnut Canyon National Monument i9s intended to assist land managers in determining the best long-term management strategy for these lands to protect their natural, cultural, and recreational values. Among other objectives, the study will focus on the suitability and feasibility of designating all or part of the study area as an addition to the monument, and explore continued management of the area by the USFS. As the efforts of the City of Flagstaff and Coconino County Board of supervisors indicate, it is important to undertake a study to determine how to best to protect the lands surrounding Walnut Canyon National Monumenyt from future development. The forest lands surrounding Walnut Canyon NM are important open space and natural areas for the community, containing high value natural and cultural resources worthy of protection. We are strongly supportive off expanding Walnut Ca nyon National Monument. However, any expansion area must include the same protections as the current monument and it is critical to have consistent management for the entire monument unit. As a Nationalo Park Service unit, it should focus on resource protection per the National Park Service Organic Act of 1916. The Organic Act states: The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purposes of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the	Walnut-Canyon-Study-Comments-05-2010_v3.doc

natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. This means that resource protection supersedes recreation and only recreational uses that are compatible with resource protection should be included in the Monument. The focus of the study should be resource protection and uses that are consistent with a National Park Service unit and should not include off-road activities, including snowmobiles, livestock grazing, hunting and target shooting, and other activities that are incompatible with the Monument. Such nonconforming uses in a National Park Service unit would be unacceptable. On continued management by the Forest Service, the study should consider eliminating uses of the lands surrounding the current national monument that do not adequately protect the natural and cultural resources for which the monument was established to protect. The lands being considered for the Monument expansion will enhance the values of Walnujt Canyon National Monument because of the significant wildlife values including Mexican spotted owl (Strix occidentalis lucida) and northern gowhawk (Accipiter gentilis) habitat. The Mexican spotted owl is a threatened species pursuant to the Endangered Species Act and this area contains five Mexican Spotted Owl Protected Activity Centers. Protecting this area under National Park Service mandates will better protect the owl and its habitat. The proposed expansion area is also home to six northern goshawk post-fledgling areas. Including these areas will help better protect this sensitive species. The area also has significant tracts of old growth. Thanks to one hundred years of logging and cattle and sheep grazing, 98% of southwest old growth ponderosa pine has been liquidated. Protecting these remnant old growth tracts presents additional justification for protecting this rare and sensitive habitat under Park Service management. Thank you for considering our comments. Please keep us apprised of any developments relative to this matter. Sincerely, Jim Vaaler, Chairperson Sierra Club / Grand Canyon Chapter	
The biggest issue with the WC study area is maintenance and security. Historically for some years now it has been a transient area and overall garbage dump. A lot has been done to clean it up but the garbage comes back and vandalism continues and will continue do to the remote location. Make sure what ever happens out there that funding is provided for upkeep and security otherwise you are wasting your money.	
I am supportive of expanding Walnut Canyon National Monument. Any expansion area should have the same or stronger protections as the current monument. As a National Park Service unit, it should focus on resource protection per the National Park Service Organic Act of 1916.	
Walnut Canyon National Monument and the surrounding area contain some of the finest wilderness in Northern Arizona and some of the best preserved Ancestral-Puebloan ruins. I believe this site should be expanded and used for studying the effects of climate change on native plants and animals. A truly high percentage of Pinyon Pines have died in the area as a result of global warming recently. Historically, native peoples have been dependent on these plants and many other plants and animals depend on them as well. I also believe the area would be a prime place to reintroduce endangered animals such as the Pronghorn Antelope and would likely e a suitable place for the reintroduction of a Mexican Gray Wold pack. The area would also serve as a strong wildlife corridor to help animals pass across the Mogollon Rim and into the San Francisco Peaks area.	
Please conserve Walnut Canyon for the many generations to come, it has always been a special place to me and my family and I woulde be devastated if it were to dissapear or be commercialized.	
I am very glad to see that the study is going forward. I believe that no thinning should take place on land in the study area at this time. The primary concern on the land in the study area is to prevent sale or exchange of any parcels that would result in development or new roads.	
According to requirements, additional areas of Walnut Canyon (WC) should be protected with National Park status. 1) it is an outstanding example of a type of resource. Not only do artifacts and features exist from the Sinagua people, but twig artifacts have been found from archaics. These human remains are extremely valuable and clearly represent 2) cultural themes of our nation's heritage. The canyon is also a 3) superlative opportunity for scientific study. Numerous species of animals live in WCand it is also a protected area for Mexican Spotted Owls. The area is also an important corridor for migration. Therefore it is home to 1) a particular resource, 2) important as a natural theme, 3) and opportunity for scientific study. The overlap of plant and animal zones in WC is a rare occurrence and meets requirements, 1, 2 and 3. If this area is not protected, we will begin to see the degradation of 4) this relatively unspoiled example of a valuable resource.	
This appears to be another land grab. Hinden be hind a so called study area, oh so common these days. Im very disapionted. My family and I live on Lake Mary Road, and enjoy the study areas shown very frequently thuoghout the year hiking, bike riding, hunting or just taking a drive and sight seeing. My family and I are native to Flagstaff our parents and our parents, parents have enjoyed the area menchend for countles years! It saddents us to have such a important area we love to soon be taken away. and then possibly traded later on to developers creating gated communities and or priviate golf resorts. And ruined forever. !!!! Not very good idea in our eyes!	
I would like to urge the NPS and USFS to permanently protect the Walnut Canyon Study Area and to prevent the area to be sold, swapped, or be otherwise vulnerable to future development. Open spaces with high cultural and scenic value should be protected for all public to enjoy.	
I am much in favor of expanding the existing area around Waolnut NM for the preservation of the area and the protection of associated wildlife. I believe it is very iimportant to set these areas aside for the future enjoyment of our posterity. The US leads the world in the important work - let us continue to set the standard.	

Friends of Flagstaff's Future is pleased that the U.S. Forest Service and the National Park Service are conducting the long awaited study of the lands around Walnut Canyon National Monument. Our members have diverse opinions on what kind of recreational uses should be allowed within this unique area of the Coconino National Forests. We are encouraging them to attend the public meetings and submit their comments online. But one thing that we have always promoted in the Flagstaff area is the protection of our beautiful open spaces, especially those areas that have cultural and scenic properties and are threatened by nearby development. The areas around the National Monument, particularly those to the northwest of the Monument that also include state trust lands, are threatened by the exapnding growth of the City of Flagstaff. These State lands and the U.S. Forest lands around the monument should be protected from the future trades or sales in perpetuity. We support management options that would lead to this kind of protection and also the continuation of the recreational uses that our members enjoy. We look forward to commenting on the options presented to the public in future meetings	
The Walnut Canyon area should be given a designation so as to provide maximum protection for this critical natural area. Inclusion in Walnut Canyon National Monument would be the best way to accomplish this. This area is home to many native species of plants and animals and it is vital that we protect this critical habitat.	
In addition to the regional cultural significance of the area, two factors are of primary concern to me: preventing encroachment by development, and preserving the natural quiet of the area. If not addressed, both of these would impact the culteral integrity of Walnut Canyon.	
I am writing to ask that you institute permanent protection for the Walnut Canyon area. Walnut Canyon is a very sensitive eco-system that needs protection. I would like to see it expanded. I would like to see State Trust Lands (Section 20 and 30) included in the study as they are both on the perimeter of this area and to increase land use by building on these two sections of state trust land is a threat to the eco-system in place at Walnut Canyon. There is also a huge riperian area. Several of the birds are on the endangered species list. It is incredibly important to protect this area. Therefore, I'd like to see Walnut Canyon expanded and protected in the best way possible.	
The Walnut Canyon sTudy area is important to me because I live nearby and recreate in the forest. I see people on a regular basis using the forest and state sections of land in the area. Hiking, dog walking, running, biking, archery hunting, cross country skiing, and snowshoeing are popular activities, as well as motor vehicle, ATV, and dirt bike use on the existing roads. Although I enjoy this area, I also recognize it for what it is ? An urban interface that sees high human use and unfortunately a great degree of impact and damage. The Forest Service has done a great job of mitigating some of the imipacts, but this area does not contain pristine or even repairable natural resources that would justify inclusion into the national park system. On the other side of the fence? The Walnut Canyon National Monument is a nice area that fills a certain niche; a highly controlled and regulated environment where people can learn about native peoples that lived in the area. The monument seems more than adequate, in terms of its size, to handle the volume of visitors it receives. I do not believe the Forest Service and Arizona State Lands of the study area can be considered a place of national significance as described by the National Park Service. 1. It is not an outstanding example of a Ponderosa Pine forest, pinon-juniper woodland, or any other resource that I am aware of. 2. Although there are Native American ruins in the area, it does not possess exceptional value of natural or cultural themes. 3. It does not offer superlative opportunities for recreation, for public use and enjoyment, or for scientific study. Its recreational popularity is solely based upon its proximity to Flagstaff neighborhoods. 4. It certainly does not retain a high degree of integrity as a true, accurate, or relatively unspoiled example of the area's natural resources. Thank you for the opportunity to express my thoughts.	
The area under study is of great importance to the Flagstaff region. Known for our great outdoors and open space, this area provides a unique opportunity to experience the area through multiple ways, including rock climbing, hiking, biking, camping, touring and more. To be able to continue to use most of this area in a similar fashion would be important, however knowing that there may be some development along the primary roadways that may provide income to better protect and sustain the area. Throughout the study it would be important to address the feasibility of maintaining the entire area, understanding that in order to maitain our natural beauty, there is a cost. Looking at possible permitting or day use fees may be an option, or re-evaluating grazing permits. As a Flagstaff resident I have visited quite a bit of this area, from rock climbing, hiking the Arizona Trail, taking family to Walnut Canyon or biking around the area. There may be opportunity to further develop some of these activities, or more, through organized recreational opportunities (parks).	
I would prefer to see this Study Area remain under the management of the USFS. This will insure that ranchers may continue to use their grazing allotments to produce beef; as well as continued use by the public for nature studies, hiking, biking, camping, horseback riding, and hunting. If the Study Area is designated as an addition to Walnut Canyon National Monument and managed by the National Park Service, the use of the area by the public will be severely curtailed. Under the management of the Park Service, ranchers and others entitled to use this area would not be able to uses the area for grazing or the many other activities that are permitted at present. My family is involved in the ranching business and this will hurt our livelihood. Please leave this Study Area under the management of the United States Forest Service.	

I would love to see this whole area preserved for primarily hiking/biking and horse back riding. Putting more houses in this area would be detrimental to all these activities, but also, I think, to the mission/purpose of Walnut Canyon NM. If studies support that the deer/elk population would suffer if hunting was excluded, then I would support the continuation of this activity. Otherwise I'd love to hunting excluded from this area as well. Addressing this area as one coherent ecosystem would make most sense. We don't do that very often, and the more we do, the more we, and nature, will benefit. I believe there are several species-of-interest (if not actually endangered) that are thought to live in this area. I would support all efforts to preserve the environments needed for their survival. I would definitely support archeological surveys being done in this area as well. We know there are irreplaceable treasures in Walnut Canyon NM. But there are likely sites in the surrounding area as well that should be preserved. I don't, personally, care who should be responsible for this area (USFS or NPS). I just think it should be preserved and protected in perpetuity.	
I support the study. But I have educated myself as to the Walnut canyon area. I strongly urge the largest piece of contiguous land to the current Monument be added. Furthermore National Park status for the expanded Walnut Canyon, Wupatki, and Sunset Crater is also in the best interest of the region and resources.	
Why is the Study Area imiportant to you and what makes it special? The Study Area borders our neighborhood, and our family usess this land frequently for hiking, mountain biking, dog walking, and occasionally for hunting. This area is a beautiful Ponderosa Woodland, which includes several strikingly beautiful old growth Ponderosa canyons. We strongly support the expansion of Walnut Canyon National Monument and land management by the National Park Service. What recreational/visitor opportunities do you think should be addressed by the Special Study and maintained in future options. We feel that hiking, mountain biking, dog walking, and rock climbing, should be allowed to continue in this area. In general, the National Park System is not friendly to mountain bikers or dog owners (neither are allowed on trails). In addition, dispersed access should be permitted along boundaries to allow access by traditional users and neighbors (currently, the National Park System attempts to funnel all visitors through limited entry sites where fees are charged). Hunting for elk should continue in this area. Elk in the Study Area face only limited predation by Mountain Lions, thus human predation of elk is important in order to limit herd size and promote forest health. What resources do you think should be addressed by the Special Study? Forest health if of primary importance. In particular, thinning and/or burning in and around the remaining stands of old growth Ponderosa should take first priority. Old growth Ponderosa islands exist on the East side of The Pit? Climbing area and extensively along the National Monument. Thinning and/or burning the remaining forest should be a second priority. Grazing should be eliminated through the Study Area as it promotes and maintains the current unhealthy ?dog hair? Ponderosa forest. Wildlife resources are also very important. Two species of note not mentioned in the study area notice are Black Bear and Wild Turkey, both of which have a healthy, year-round presence in the Study Area. What other management issues do you think should be addressed by the special study? Why aren't Marshall Lake and the other small lakes on the Northwest part of Anderson Mesa included in the Study area? These natural riparian areas contain highly diverse plant and animal life, and would be a truly unique addition to the monument. Riparian areas are exceptionally important on the mostly dry Coconino Plateau, and are not well represented in the current Study Area proposal. Currently, these area are negatively impacted by grazing. In addition, Marshall Lake is impacted by the dumping of (literally) tons of trash by campers each year, and the Forest Service seems ill-equipped to prevent such degradation. Why not run the far Eastern boundary of the Study Area due South to Lake Mary Road, in order to protect the unique habitats of Northwest Anderson Mesa?	
First of all, we are very conern that no information or notification was sent to the homeowners of our community, which is within 1 mile of the proposed new boundary. We found out about your study and open houses from friends, rather than directly from the FS or NPS - this is very disturbing! We have attached our comments, as there is very little room for any substantive comment here. Our bottom line: do not expand the boundaries - Walnut Canyon NM does not need additional buffer lands and these lands do not meet any of the standards for National Significance.	Walnut-Canyon-Study-Area-Response-05222010.doc
The forcus of the study should be on the natural and cultural resource protection . This is a very sensitive area for the local wildlife including endangered species which need to be protected. This area also includes many cultural artifacts and need to be protected.	
It is very important to maintain free access to hiking-biking trails that go from Campbell Mesa all the way to the Arizona Trail. The area between Old Walnut Canyon Road and I-40 should remain open to horseback riding, hiking, dog walking. Continue to keep this area closed to motorized vehicles. Ensure there are no Forest Service land exchanges or development. Provide a public comment period after each stady of the study draft.	
Thank you for this opportunity to add these few comments to the scoping process. I attended one of the open houses and observed that many people were able to give information that will inform the scope of your work of the Walnut Canyon Study Area. I just have three items for you to consider. 1. While the legislation guiding this work clearly states that the questions of significance and feasibility, which is used in evaluation possible new units to the Park System, be used in evaluating whether part or all of the study area be added to Walnut Canyon National Monument, it would also be useful to apply the normal criteria the Park Service has established for potential boundary changes. There is no question that Walnut Canyon NM is significant and feasible, so it is almost a given that areas adjacent that have the same resource values for which the monument was established would meet both criteria. The National Park Service's Criteria for Boundary Adjustments, contained in Appendix C of the Supplement to Planning Process Guideline (NPS-2), list these considerations. It is imperative that you evaluate with these criteria as guidance so that local authorities, the public, DOI officials, and the ultimate decision-maker, Congress, will have the information they need to properly evaluate any possible expansion of the	

monument. 2. We hope that your studey will honor and address earlier proposals to expand the Monument's boundary, especially those put forward by the National Park Service, National Parks Conservation Association, or Friends of Walnut Canyon, by including them as alternatives. 3. It has been proposed in the past that Walnut Canyon National Monument be designated a National Park. This should be included as an alternative. Though probably outside the scope of this current effort, I would like to see a discussion of an expanded Walnut Canyon NM being included as a unit of a larger park that could also include Sunset Crater and Wupatki as units of the same park. Joining these units together as one park would not require much change in current NFS management of them, and would provide Flagstaff and Coconino County with greater tourism as more people visits Parsk than Monuments. Again, thank you for your consideration. Please call upon NPCA if we can be of help in this study.	
To whom it may concern, I would like the lands surrounding Walnut Canyon, including the State Trust lands protected from future development. I also want would like further protection of the Monument from the noise pollution that would come if Arizona Game and Fish puts a shooting range within 3 miles of the Visitor Center! Please, PLEASE work towards preserving our valuable and vastly important canyons and unique lands of Arizona. The people need, want and must have these places perserved for our future generations. Sincerely,	
The portions of the proposed area of study--Sections 20, 30 (Arizona State Trust Land)--should be included in the existing study for expansion of Walnut Canyon Nat. Monument and be given careful consideration to be preserved in the Walnut Canyon Monument. Section 30, for example, remains nearly pristine (I have a Ph.D. in Ecology but I use the tern as a layman) especially for a second growth area logged a century ago. It appears almost untouched by human activities. The habitat within it contains refuge and home range for elk, deer, coyote, raccoon, javalina, and even threatened pronghorn antelope as well as hundreds of other sepcies of mammals, birds and reptiles. Given that this habitat type changes (and degrades) in all directions away from this specific area, Section 30 and the adjacent sections of Coconino National Forest are more valuable biologically (and culturally) than most other lands more distant from this point. Hence special stody and evluation should be focused on these lands. In addition, The City of Flagstaff has focused on Section 20 as a potential development area for long-income, dense housing. I find this an ill-conceived plan for many reasons, one of which is that low-income housing located more than five miles from the stores and other city infrastructure needed by those low-income residents will require them to make many repeated 10 to 15-mile round trips for basics. In an era of soaring prices for fuel and transportation, the City's setting up such a non-economical arrangement for economically-challenged people seems not merely ludicrous but actually discriminatory in a negative way. This region of study surrounding the current end of Butler Avenue and Amberwood and Wakonda should be evaluated both biologically and culturally for its existing biological and cultural values and, findings forthcoming, recommended to be included in Walnut Canyon Monument. Such inclusion would cost very little to taxpayers and USNPS budgets and also "rescue" these valuable natural areas from unneeded development (spurred by greed and politics, not that it makes any difference.) I urge such inclusion of the sections of State Trust and Coconine National Forest lands -- data pending -- in the strongest possible way. I urge against non-inclusion of said lands -- and hence development as housing or commercial beuilding -- also in the strongest possible way.	
I am pleased to comment on the current Walnut Canyon Study. Also, I am grateful to those individuals and entities whose efforts have allowed this project to proceed. I am in favor of transferring the Walnut Canyon Study lands to the National Park Service to achieve increased protection from development and careless overuse. In fact, I recommend expanding the study area in two directions. Please include nearby Picture Canyon which contains spectacular petroglyphs, and which desperately needs additional protection. The ruins in Picture Canyon were among the first in the Flagstaff area to be studied by modern archeologists. Also, please include the parcel of Coconino National Forest which surrounds the private property on South Cosnino Rd and which touches the western boundaries of the private property in the first mile of FS 82. Leaving this narrow strip of land to the Forest Service will only confuse the public about hunting, shooting, camping, etc; and will possibly make these lands vulnerable to degradation. I want this special area to remain as undeveloped as possible. Please protect the hundreds of 800 year old field houses replete with pot shards and other artifacts. Please protect the isolated petroglyphs. The study area already includes portions of the Arizona Trail so please maintain reasonable access for hikers, horseback riders, mountain bikers and pet walkers. Create access for those who must travel by car or wheelchair or are otherwise differently abled. Remove cattle and barb wire. End hunting and target shooting. No ATV's. Eliminate some of the unauthorized dirt roads. And, fight the conversion of nearby Foster Ranch to a shooting range. I believe that many creative designs might be considered for the expanded Walnut Canyon: possibilities which range from national park to conservation or preserve status. Let's allow the National Park Service to do what they do best: preserve, protect and share the most special places in the United States.	
I oppose the inclusion of Campbell Mesa into Walnut Canyon Park, because Campbell Mesa, as it presently exists, is the best place for our family recreation, including hiking, running and bicycle riding on trails without automobile traffic. It is also located almost within the town of Flagstaff, adjacent to our home. Inclusion of the Mesa in Walnut Canyon would probably result in development which would, in effect, deatroy the present excellent facility as it now exists.	
I would greatly like to see the Walnut Canyon Expansion under NPS management. I live and recreate in the area and have been disburted by target practicing in the proposed expansion area. Moreover, I am concerned that development pressures in Flagstaff could force Forest Service land exchanges. The archeological and natural resources of Walnut Canyon deserve expanded NPS protection.	

Walnut Canyon is already protected as a part of the National Parks system. It surrounded by National Forest. This expansion is simply a proposal by the director to make her look good to her boss. The larger you make the perimeter the more difficult it will be to secure it. Removing land from public access in order to enrich a privilaged few is just plain wrong. As it stands right now there are more No Tresspassing and No Admitace signs around the perimeter of the Walnut Canyon National Park than are found in most sign shops. Just who do you people think you are kidding when you say that it is being saved for the public. Just what makes you think that you need a 20 mile front on the North to this place. The owls are doing fine. They are nothing but an excuse by the "Friends" of Walnut Canyon. All important Archeological ruins are down in the Canyon. Your archeologists know it. Why remove land from public access in areas that is basically worthless to you. Pot hunters don't care about posted boundries, and making them larger only makes them easier to penetrate. The "Public Meetings" on this matter were poorly publicized except within the Clique of the "Friends of the Canyon". There are currently insuffient funds to develop and properly process the Archeological finds within the canyon. How is making it larger going to make it better?	
	Walnut-CanyonSTudy-Area-comments.docx
	AES-WCNM-commends.doc
	Walnut-LTR-2010.doc
We would like to see the proposed study area lands added to Walnut Canyon National Monument to protect the watershed, maintain non-motorized public trail access, and limit future development. Walnut Canyon is a spectacular area, we always take out-of-town visitors for a tour as it exemplifies the flora, fauna, and history of the Colorado Plateau. We would be especially disappoint if AZ Game & Fish located a shooting range within the special study area as noise pollution travels easily.	
As a frequent hiker in this area it is important to me that we maintain free access to the area and protect it from development. The study should address trail maintenance and protection, new trail development and parking. Keeping it closed to motorized vehicles is important. The study area is a wonderful recreational area that should be preserved, and enhanced. Thank you	
I feel that it is of the utmost importance to preserve the quality and integrity of this area. We are very concerned about the proposed shooting facility that is planned for this area. I have hiked, biked and ridden horses over this area for over 30 years. It is one of the most beautiful areas left in the county. I have seen a multitude of species of wildlife that may be endangered as well as the peace and serenity it provides us in a world that is not so peaceful. Certainly the state can come up with a better site a bit farther away from this area for a shooting range that would neither disturb the peace and habitability of the area. How about Two Guns?	
I would like to see the current use of the land stay as it is open for hunting, hiking, horseback riding and being part of the flagstaff trail system it is a highly used resource for the recreation in the area. If the motorizes vehicles were blocked from access with the exception of fire suppression that would also be acceptable to me. To put an area that large into the national park that has nothing to with the monument and block the access to hunting and the flagstaff trail system is not acceptable to me.	
The expansion of Walnut Canyon National monument into the proposed areas would significantly affect the recreational opportunities on the southwest side of Flagstaff. In particular, the Campbell Mesa trail system, the Arizona Trail, and the Fisher Point trail system would be effectively closed to mountain bikers. These trails not only provide a valuable recreational opportunity in and of themselves, but also serve as valuable 'connector' trails between larger trail systems. In particular, the Arizona trail is a continuously trail running from the border of mexico to the border of utah through the state of arizona, and closing this section would effectively put a gap in the rideability of this trail in it's entirety. This trail as well as the Flagstaff loop trail (which are the same in this section) provide users the opportunity to difficult, if not impossible to fill around the proposed area. Please consider all recreational users when making your decision about the affected trails and the effect this closure would have.	
I wholeheartedly support the efforts to put to the proposed areas under control of the USFS.	
The Walnut Canyon area is very close to my house. My family and I enjoy hiking and biking in the proposed study area. We are not damaging the land but are using it responsibly. We would like the land to be kept as open space with the ability to continue to use it to hike and bike. Thanks,	
As a frequent user of the Walnut Canyon Study Area, I feel that status as a NCA would be prohibitive to its equal use by all interested parties and current users. Although proposals to convert to a NCA do allow for completion of proposed trails, NCA designation would be too inflexible and would disallow future non-invasive developments that could enhance usability and enjoyment.	

As a long-time Flagstaff resident and frequent hiker and mountain biker in the Waln ut Canyon area I'd like to state that the area in question is unique and very much deserving of additional protection. The last thing any9one should want to see is this beautiful area carved up and developed. I believe that the best way to both protect this area while still allowing prudent recreational use is not to expand Walnut Canyon National Monument but rather to designate the land as a Congressionally Designated National Conservation Area. Ralph Baierlein's proposal seems the way to go.	
Keeping mountain biking as an option on Campbell Mesa, Walnut Canyon Rim, Fisher Point, Arizona Trail and Flagstaff Loop Trail is vital to the Flagstaff communitty. That system of trails is the only trail access in that area, and provides a unique trail system that can not be found in the rest of Flagstaff. Closing it to bikes effectively removes the mountain bike community from having any vested interest in maintaining the trails, or cooperating with officials in charge of the Walnut Canyon area. The mountain bike community should be credited with much of the construction of the trails in that area (notably: Cambell Mesa and Flagstaff Loop Trail), so removing mountain bikes from access to those trails is particularly ironic. The mountain biking community as a whole is a very respectful group, driven with environmentally conscious ideas. We want the same things as hikers, equestrians, runners, and other trail users: access to the beauty in and around the place we call home. Thank you for your time,	
Keep mountain biking on all the trails currently designed and built to allow biking. I am `100% opposed to a designation that removes mountain biking. Fine to limit or remove motors.	
I recently received an e-mail from the Flagstaff Biking Organization in regards to the Walnut Canyon Special Study. I strongly share the opinion of the FBO that this area should not be annexed into the Walnut Canyon National Monument due to the fact that it cuts off low environmental impact recreation opportunities including mountain biking. I am in support of any measure to additionaly protect the land as long as the continuation of cycling opportunities in the area is assured. Personally, I greatly enjoy cycling in this area and would like to see cycling preserved here for the forsee future. It has been my experience that cyclists in general have respect for beautiful land such as the Walnut Canyon area and seek to preserve it in good condition.	
The AZ trail is a KEY trail for mtn bikers in AZ. There are books written on the riding of the entire trail from UT to Mexico. WHY would we ever consider closing access to it for bikers? It makes no sense	
Dear Walnut Canyon Study, I, my family and many friends have been mountain biking on established multi-user trails in this study area. Removing these trails or removing our privilege to ride them will decrease our quality of life. It seems these lands could be protected from development while leaving the trails open to the multi-user population that currently enjoys them.	
Our primary concern is that bicycle access continues as it has in the past within the boundaries of the Walnut Canyon Study Area. Some of the most popular trails for mountain biking in the Flagstaff area are within these boundaries. The Campbell Mesa trails provide a beginner to intermediate riding experience that is not as common in the Dry Lake Hills or Fort Valley areas adjacent to Flagstaff. The Arizona Trail offers a unique canyon rim riding experience, distinct from the mountain trails nearby. The Arizona Trail also provides connectivity for an unparalleled opportunity to ride from the Mexico border to Utah. Once finished the Flagstaff Loop Trail will create connectivity to trails offering opportunities for non-motorized transportation and recreation between the City of Flagstaff, Flagstaff Urban Trail System, (FUTS), outlying neighborhoods and the surrounding National Forest Lands and Forest trail systems. Difficulties with Park Service management We have strong concerns with the designation of any of these lands as National Monument or National Park. Designations that would entail Park Service management are apt to be problematic for bicycling. We are concerned that Park or Monument designation would present legal problems for trails being designated open for bicycle use. Currently, changes are being made to policy that should allow for bicycles to be permitted on some existing trails in National Parks through a regular NEPA analysis, rather than through a Special Regulation coupled with NEPA. These changes would still not allow new trail to be constructed with bicycle access in mind. Although we have no intention to push for significant expansion of the existing and planned trails with the Study Area, we do think it may be appropriate in the future to provide connector trails between as yet to be constructed FUTS and the Flagstaff Loop Trail. Park or Monument designation could create insurmountable barriers to this. We also do not believe that the Study Area is worthy of National Monument or National Park designation. Monuments and Parks are ?America?s Best Places?. Although the Walnut Canyon Area outside of the current Monument boundaries is quite beautiful, and marginally unique to the immediate Flagstaff area, it lacks the specific significant criteria for National Monument or National Park status. Regardless of the legal ramifications of bicycle access to National Park or Monument lands, the National Park Service does not focus on the unique aspects of trails constructed with bicycles in mind. Mountain bikers in Flagstaff seek a diverse range of experiences provided for by different parameters for trail construction than those typically employed by the National Park Service. We don?t believe that these types of experiences are best addressed by Park Service management. We are concerned that trails that are currently free to ride may become part of a fee area, as Walnut Canyon National Monument currently is. Preferred management option This noted, we do support the need for a stronger level of protection of this landscape than is currently offered under the existing management plan. We recommend and support the proposal being forwarded by Ralph Baierlein for the Walnut Canyon Study Area to be proposed for designation as a National Conservation Area under Forest Service management. It is our contention that a National Conservation Area would provide both the permanent protection from development many Flagstaff residents support and the flexibilitiy in management necessary to provide for the multiple user groups who enjoy and recreate within the Study area. We support management by the US Forest Service because we see that this agency possesses to necessary expertise to manage for these multiple uses, and specifically bicycling, in an	

appropriate manner. We appreciate this opportunity to comment. Please feel free to contact us should you have any questions regarding these comments. As you can see this comment is directly from the Flagstaff Biking Organization, which I am in strong agreement with. I use this area for lots of biking and find the current, proposed trail system to be of great value and would like to keep the biking access as open as possible.	
I am 100 percent against any changes to Walnut Canyon area that might impact mountain biking. The NPS is good about trying to prevent the American public from accessing our lands and trying to save it for only the granola types and lizzard lovers. NO to any changes. As a matter of fact, open the whole park to mountain biking all the way to the bottom of the canyon is my position.	
I would urge that other means of protecting resources in the Walnut Canyon Study Area be considered. National Park or Monument status would be very problematic for mountain bicycle access, specifically on the Arizona Trail. Bikepackers (similar to backpacking but with a mountain bike) traveling of the Arizona Trail are already forced onto dangerous highways as a result of wilderness areas that prohibit bicycle access. An expansion of Walnut Canyon would again require cyclists to detour on busy highways (Lake Mary Road, most likely), which is emphatically not the experience (quiet, singletrack, natural setting) that bikepackers are looking for. Again, it is a safety concern as well. In my opinion this area also provides some key links in the Flagstaff Urban Trail system as well as the general trail network. Mountain bikers often wish to access far trails by riding from Flagstaff (rather than driving to trailheards) and this area provides that opportunity. A designation such as natural conservation area would help protect the resources while still maintaining current recreational access.	
I would like to voice my conern about the proposed restrictions to the Walnut Canyon Area. I am an avid cyclist and use the Walnut canyon area frequently. I believe it would be a shame to restrict trail use in the Walnut Canyon area. I live in Flagstaff for the quality of life that it affords me and my family. To place restrictions on such a beautiful area would greatly diminish our quality of life. My family and countless individuals that live and visit the Flagstaff area rely on trail access for exercise, fun, community and mental well being. The great outdoors also draws tourism to Flagstaff which helps our economy to remain vibrant. I believe it would be short sighted to restrict access to the Walnut Canyon area. Please consider leaving access to Walnut Canyon as it is now. Thank you for your time and consideration.	
I enjoy mountain biking on the Campbell Mesa trails and on other trails (Arizona Trail) and proposed trails (Flagstaff Loop Trail) in the area of the proposed expansion of Walnut Canyon. Please do not pass legislation or rules that would prohibit mountain bikers and hikers from these trails. Thank you.	
Please do not extend the boundaries of the Walnut Canyon monument. The benefits do not outweigh the drawbacks and as a mountain biker and hunter it adds restrictions that the area does not need. Please heed the public opinion and do not extend the monument!	
I favor the national conservation option for the Walnut Canyon Study Area as proposed by Ralph Baierlein and supported by the Flagstaff Biking Organization.	
The proposed area doesn't meet any of the four National Significance standards. It is an average example of a particular type of resource that is abundant in the reigon. While WCNM does, the study area does not possess exceptional value or quality illustrating or interpreting the natural or cultural themes of our nation?s heritage. It offers opportunities for recreation for public use and enjoyment, or for scientific study that on on par with the rest of the Coconino NF. It retains degree of integrity as a true, accurate, and relatively unspoiled example of the resource but not what I'd consider high, there are non native plants, it's been grazed, and driven all over. Consolidating the land holdings and making it part of the national forest management plan is adequate to preserve the area as it.	
Please "Do Not" expand this area.	
I support the Flagstaff biking.organization advocacy non profit position on this subject.	
Please do not extend the Monument if it would interfere with existing hiking and biking trail systems in Walnut Canyon and Campbell Mesa. Thank you	
I am an avid Mt. biker and use the trails near Walnut Canyon often. I would not like to see changes in this area.	
I support the need for a stronger level of protection of this area than is currently offered under the existing management plan. It is my belief that designation as a National Conservation Area under Forest Service management effectively provides this protection and also maintains current public access and uses including hunting, grazing, mountain biking, hiking, and horseback riding. I am a long-t9ime user of the trails in this area and would like to continue to use them, without fees, as a hiker, runner, and cyclist. Protection of this area with a NCA would ensure that the qulaity of the experience would not diminish with time.	
Any intelligent public use plan has to maintain equal access to all three low imipact groups, hiking, mountain biking and equestrian. Equestrian impact has been shown to have the largest negative impact in many studies but they need to be an integral part of any program in spite of their history to hog and hoard access strictly for their own use in the past. They have the experience and need to be partnered with for mountain biking to grow and prosper in any area.	
I'm concerned that National Park or National Monument Designation for this area would be problematic for cyclists. I have ridden the AZ Trail from the Utah border to the Mexico border. That trail goes right thru this area. It would bew a shame to break that up. I mountain bike on Campbell Mesa, Walnut Canyon Rim, Fisher Point, Arizona Trail and Flagstaff Loop Trail and these areas are important to cyclists.	

I am not in favor of extending the boundaries of the Walnut Canyon National Monument. The unintended consequences of the expansion would harm bicycle access to the Arizona Trail, Flagstaff Loop Trail and the Campbell Mesa Trails. In my view, increasing the potential for losing access to these very valuable bicycling trails significantly outweighs any benefits of extending the boundaries of the Monument. Thank you for taking the time to consider the opinion of a responsible mountain biking citizen.	
I am not in favor of expanding the Nat'l Monument area of Walnut Canyon. An important network of trails exists in the area, including a plan for a connecting section of our local FUTS loop trail. If this area be came part of a Nat'l Monument, local, longtime trail users would face concerns and a bunch of bureaucratic nonsense to access the area. I am familiar with the trails and area intimately. The area is used by families, maintained by local trail groups, and kept clean. As a long-time resident, I feel it would be detrimental to usesrs to expand the monument. If the Federal programs are already under-funded, how will they hope to manage even larger areas of this designation status??? Expansion of this monument is a BAD IDEA.	
Expansion of Walnut Canyon Park should not impact existing hiking and biking trails in the area. One of the most enjoyable trails in the area runs along the north edge of Walnut Canyon. Use of the trails does not provide ready access to the canyon bottom and therefore does not impact any indian ruins. Parts of the Arizona Trail run near Walnut Canyon. This trail is a national treasure and should not be affected by any expansion of the Park.	
I am responding to let it be known I ride my mountain bike, xcountry ski, hike in the proposed area frequently and would be highly disregarded if the are of Campbell Mesa and Fisher point were no longer available for any of the aforementioned activities. We as residents of Flagstaff have limited areas of this magnitude and the areas are so often SO crowded with recreationists especially folks from Phoenix in the summer that by closing this are to mountain bikers will only increase this type of travel in other areas that are already crowded and over used.	
Having the FREEDOM to mountain bike on Campbell Mesa, Walnut Canyon Rim, Fisher Point, Arizona Trail and Flagstaff Loop Trail is important to ME! Do not take away our freedoms!	
I was dismayed to learn that the proposed Walnut Canyon Study Area is threatening the multiple use of a number of existing and proposed trails. I visit the Flagstaff area every summer, and enjoy volunteering to build trails. As an avid mountain biker, it should come as no surprise that I expect the trails I build to be open to mountain biking--and stay that way. I lived in Tucson in the 1990s, during which time an out-of-state environmental group demanded that a short segment of the popular Cactus Forest Trail in nearby Saguaro National Park be closed to mountain biking. Rather than fight to keep it open, the NPS simply rolled over. I have absolutely no doubt that a similar fate would be in store for all trails in the proposed Walnut Canyon Study Area, under NPS management. Please keep the area under the current and proper management of the Forest Service.	
I have been riding those trails for over 10 years, which is why I live here in Flagstaff. Mt biking on those trails is some of the best riding I can do right from my house. I don't even have words to describe the disappointment I would have if those trails were closed. Those trails are some of my favorite ways to enjoy the great out doors only a few minutes from my home	
Please do not close the mentioned trails. Mountain biking is very important to the community and closing trails will have a negative impact on the community. Also bikers help maintain trails on a voluntary basis	
My position is simple. The Arizona Trail and other adjacent trails that would be affected by this proposal are priceless to many in the cycling community. I first rode them in the late 90's, and they remain a favorite when I want to introduce friends and family to the beauty of Northern Arizona. Many cyclists are looking for a more relaxed and less strenuous route through the forest. Please keep these gems open to cyclists as well as other non motorized trail users. Thank you for your consideration.	
I would like to say that since the hiking and biking trails have been opened and improved in the Walnut Canyon area I have enjoyed using them. It would be a sad day for many that use these trails to hike, bike and walk there dogs if these trails were not available. There use has increase tremendously in the past 2 years and continue to gain in popularity. Please consider all of us that use this trail network. Thank you for your time.	
As an avid cyclist who regularly rides on the excellent trails in the Walnut Canyon Study area, I am writing to plead for this area to be preserved in a way that allows for all present recreation uses to continue. I also ask that this not become any kind of fee area; including that for parking. It appears that the best way to do this would be to designate it a National Conservation Area. Thank you for your consideration of this request.	
I feel that the expansion of the Walnut Canyon Monument would unnecessarily impact the recreational use of the proposed zone, and that the benefits would be extremely small compared to the current use of the region. This would impact many, many outdoors enthusiasts, including bikers, hikers, and hunters. Please reconsider! I feel that the current boundaries are sufficient to protect the wonderful area around the monument. Thank you!	
I visit areas within the study area approximately once a week, mostly to use the trails (hiking, biking, etc.). This area is one of the main things that brought me and my family to Flagstaff -- access to endless trails and virtual wilderness right at our doorstep. I use these sections of the Arizona Trail and other established trails in the area because they are accessible yet provide a genuine wilderness experience. While our vehicle regularly has ample company at the trail head, we find relative solitude on the trails. This is a priceless experience that should be preserved. As a scientist and environmentalist, the solitude I've experienced within the study area has given me the opportunity to contemplate all that it has to offer. The flora are beautiful and untouched, changing weekly from early spring through the monsoon season. Even the cacti are wide and varied. I've encountered everything from squirrels to elk, and knowing humans only see a fraction of what wildlife is around them, I can only imagine the species that find the study area a hospitable habitat. I have also heard that there are archeological sites (from	

the Sinagua as well as more modern tribes) that might not have been explored throughout the proposed study area. If Walnut Canyon National Monument is any clue, this area is special and should be protected. There are many regions within the study area that I avoid because of the use of motorized vehicles. I personally dislike the noise, dust, and intrusion upon a wilderness experience. Ideologically, the impact vehicles have upon the land and wildlife seems to be greatly underestimated, and I feel this should be addressed as part of the study. Living in Flagstaff, it's easy to take advantage of the incredible natural environment we live in. Here, we do live in it! I would like to see trail access maintained throughout the study area. Yet every year, more areas like the proposed study area succumb to development. Houses everywhere are skirting what used to bew isolated trails, and the wildlife and archeological sites that surround them are suffering. We have a precious area right here in Flagstaff that we could easily protect and learn from, and we ought to take advantage of that opportunity	
The study area is special to me because I live very close to Walnut Canyon. In the past years, I have seen two expansions of the canyon. Each time they fence off more land and close it to the public. I believe that the park service has got enough land to protect what they think they need to protect. I have ridden horses all over the proposed expansion area. I have seen nothing that needs to be protected. I would prefer the land left as multiple use public land administered under the Forest Service. I would consider a National Conservation area in the Walnut Canyon study area if the land was still multiple use and administered by the Forest Service.	
I have lived around Walnut Canyon for a good portion of my life. The expanion of Walnut Canyon is unnecessary in my opinion. I have ridden horses in the area and see nothing worth protection. I firmly believe that Walnut Canyon is fine the way it is now. I see no need to fence more land from public access. The park service has plenty of land already to protect. I would like to know where the pictures were taken on the home page of your web site. The middle picture does not look like it could be Walnut Canyon. I have never seen Aspen trees anywhere near Walnut Canyon as pictured in the 3rd picture. Also, I have never seen a view quite like the one pictured in the first picture. Looks more like the Mogollon Rim to me. Wow. What is the purpose of these pictures?	
I grew up in Northern Arizona and have spent considerable time in Flagstaff as my wife is from there. I have been to the proposed area and see no reason to include it in Walnut Canyon. The park service has plenty of land to protect already. I see no purpose in this project at all. By the way, your home page has a spelling error. I believe you want it to say Canyon instead of Canon.	
I used to live in Flagstaff and know this area well. Want to see the old growth ponderosa stands protected, as well as the archeological sites. Want also to have this whole area protected from development and hunting.	
Walnut Canyon NM must be expanded. The forest area around the monument has the potential for development and/or degradation. Please exlpand the protections for this unique and important area.	
I am an avid supporter of the National Parks. I make regular financial contributions to their support. The area in the Walnut Canyon Study is important to me because it gives me and my family an open space to enjoy the forest and the out of doors. I can wander the numerous paths with my leashed dogs and look at wildflowers. Camel Mesa is important to the city of Flagstaff because it supports a system of urban parks and trails. It allows a buffer of open space for the city of Flagstaff. I think that Campbell Mesa should be open to biking and hiking. I think that motorized vehicles should continue to be banned from the area. I hope the Campbell Mesa would continue to be open to the public to provide free access to its many trails to visitors. I would like it to continue to be able to take my leashed dogs on walks through the forest there. I would like to maintain free access to hiking-biking trails that go from the entrance to Cambell Mesa (across from the cemetery) all the way to the Arizona Trail. I would like it to remain open to horseback riding in areas on Campbell Mesa and the land between Old Walnut Canyon Road and I-40. I would like to continue to keep this area closed to motorized vehicles. I would like to ensure that there are no Forest Service land exchanges to permit development. I would like there to be a public comment period after each stage of the draft.	
I am an avid supporter of the National Forest Service and the National Parks. I believed that Campbell Mesa is important to the city of Flagstaff because it supports a system of urban parks and trails. I would like to maintain free access to hiking-biking trails that go from the entrance to Cambell Mesa (across from the cemetery) all the way to the Arizona Trail. I would like it to remain open to horseback riding in areas on Campbell Mesa and the land between Old Walnut Canyon Road and I-40. I would like to continue to keep this area closed to motorized vehicles. I would like to ensure that there are no Forest Service land exchanges to permit development. I would like there to be a public comment period after each stage of the draft.	
Protection of Walnut Canyon is vital and should be designated a National Park. There are prehistoric human archeological sites, native plants and animals, and corridors for animal migration. Development in this area would endanger these unique features. The Walnut Canhyon Study Area needs to be a National Park and managed like the Saguaro National Park in Tucson.	
I support greater protection of the public lands surrounding Walnut Canyon, which is indeed a national treasure. At the same time, easy and free access to Campbell Mesa and Fisher Point are important for enhancing the daily quality of life for city residents. Like Buffalo Park to the north, these areas are essentially urban parks that foster healthful daily outdoor activity (walking, biking, hiking) for residents living on the eastern and southern boundaries of the city. My family and I frequently walk and bike these trails and consider them to be a particularly valuable aspect of the quality of life in Flagstaff. While greater protection of these lands is probably wise, some strategy must be in place to ensure that city residents continue to have the easy access they currently enjoy. If a permit system will be put into place, perhaps a free permit could be sent to all city residents. It would be essential that the burden be on the management entiry to "provide" the permit to residents (e.g. via the US mail), since	

research suggests that social class and racial differences affect who will actively seek out permits. Alternatively, perhaps city residents could continue to be permitted to use the lands for free (without a permit). Again, "ease of access" and "free access" to these areas should be a priority in future management plans for the study area. It is important to protect this natural area, but it is equally important to foster healthful outdoor activity for Flagstaff residents and to not restrict lands that are proximate to existing residential neighborhoods. Such access is a critical feature of the quality of life Flagstaff city residents now enjoy. Thank you for this opportunity for public comment.	
The Special Study of this area was to recommend the best methods, by the best land management agency, to insure preservation of the resources and compatible public uses. The National Park Service is the Federal agency that was established for, and is managed to do, just that - . . . . Preserve, unimpaired, for the enjoyment of future generations . . . While the U.S. Forest Service, Bureau of Land Management, State Land Department, Arizona State Parks System, Coconino County, and the City of Flagstaff all could provide fiscal and human resources to manage the area, none are more able than the Naitonal Park Service, particularly when there is already an established National Monument adjacent to the study area. The Forest Service has, and could, put the area into a "consideration for exchange" as they have other property in the Flagstaff region. An expanded National Monument would hold the property and manage the resource in perpetuity under already existing legislation. This transfer of property from one Federal Agency to another could be as simple as a Presidential Proclamation. In addition to a local staff already on board at Walnut Canyon National Monument, there is additional staff located in the Flagstaff Areas Office (NPS) and in other areas administered by that office - at Sunset Crater Volcano, Wupatki, Montezuma Castle, Montezuma Well and Tuzigoot National Monuments. Any additional operating funds that might be required could be transferred from the Forest Service (funds no longer required to be spent on that land and resources), or by a Congressional appropriation added to the National Park Service budget for operations of the new lands. The best agency to manage the land and resources for preservation and compatible public use is already in place. Consumptive uses could still occur on adjacent Forest Service and State lands, development could occur outside the expanded Monument boundaries, and yet a piece of primitive America, with a certain amount of "wildness" would be preserved adjacent to the growing City of Flagstaff.	
I am writing to say that I support the designation of Walnut Canyon as a National Park 9but with reservations--please see below), and would also support the area around Walnut Canyon being included in this designation. I have spent some time hiking and mountain biking in the area around WCNM and believe it has unique qualities (unlogged stands of presettlement ponderosa pine, abundant wildlife populations, incredible veiws, archaeological sites, etc) that warrant a higher level of protection. It is important to me that such a designation would lead to further resource protection measures wihtout excessively limiting local uses including hiking and mountain biking (the latter on existing trails only). I am a hunter as well, and honestly am ambivalent about hunting restrictions in the area. The other thing that I worry about is that a National Park designation would lead to increased visitation and therefore increased development of visitor infrastructure (i.e., additional roads, parking lots, facilities, etc.). If this is projected to be the outcome of such a designation, I believe it might be better to leave things as they are or seek a different special resource designation.	
I think it would benefit our Northern Arizona community to have the Walnut Canyon Study Area be a National Park. The archeological sites, the old growth ponderosa pine and the many birds and mammals in the park need protection and this is they way to do it. I would recommend that we do this, as it is the right thing to do for Walnut Canyon.	
While I agree that National Parks/Monuments need to be protected, expanding Walnut Canyon will have a negative impact on many people who currently use that area for hiking and biking. The expantion would eliminate the free access to the trails from the Campbell Mesa area. This parking lot at this trail head is always full with cars. I encourage you to maintain this free access to the hiking/biking trails in this area.	
The activities I enjoy in the Walnut Canyon Study Area are hiking, running, mountain biking, picture taking, exploring ruins, learning about native history, etc. I think it is a very unique and beautiful place. I would like to see it conserved against damage, but I am not sure what/how much is involved. Thank you for working on this project!	
I strongly support the designation of the Walnut Canyon Study Area as a National Conservation Area managed by the US Forest Service. My support of this area having National Conservation status under US Forest Service management is due to the adaptable multi-objective management style and approach undertaken by the Forest Service. The Forest Service has the capability to manage these public lands sustainably while allotting for all non-motorized trail access and development with out fees. I love to mountain bike in the Walnut Canyon terrain and hope that its continued management status allows for easy to access mountain biking without fees. Thank you.	
I was quite concerned when I found out from the locals in Flagstaff, AZ that the government was going to take over some public land, i.e. Cambell Mesa and adjoin it to the Walnut Canyon park. I do realize that this will increase funds for this park, but this area has always been available freely to all the citizens and visitors such as myself for our use and enjoyment. If this plan comes to be, I will be forced to find other "wild areas" for my use. This in turn would deprive AZ of much needed money for their economy. Please keep this area open and free.	

Walnut Canyon is a beautiful area that needs to be protected. In the effort to protect the area we should not exclue people that use that area without disturbing it, therefore any action should not exclude mountain biking from an area where it is already allowed. The same should be said for horses and hikers as well, unless it is shown that those users are negatively impacting ancient structures. It is mhy concern that mountain bikes may be shut out of trails that have been there for years or trails that they, through Flagstaff Biking, have made (e.g. Cambell Mesa trail system) or assisted with maintenance over the years (AZ trail). If it is found that further mtn bike trails should not be constructed, fine, but don't kick bikes out of areas that they already use. A large part of the forest usership in the Flagstaff area comes from mountain bikers, and mountain bikers are an asset when it comes to protecting the land from truly devastating development.	
To Whom it May Concern: I am writing to provide my input to the decision to expand Walnut Canyon National Monument. I support the expansion of the protected lands around Walnut Canyon, however I do not support the entire area being made a fee to enter area. There are several nice mountain biking and hiking trails that should be left in place and not require a fee for use.	
I lived in Seward Ak for 20 years. When the D2 land legislation passed in the late 70"s a number of new parks were establlished in Alaska, Kenai Fjords was one of them. Places wear we could take our snow machines and walk our dogs became off limits. I am not a big fan of a organization that locks away land and tells the public they know best. Our National forest mission statement says it best. "Land of many uses" Keep it that way	
I am against the proposed expansion of Walnut Canyon National Monument. The area proposed to be added to the Monument is currently heavily used by local residents as well as tourists from all over the world. The uses of this area should not be restricted similar to the current Monument area. The Arizona Trail runs through this These restrictions should not be allowed.	
I would like to see Walnut Canyon expanded and turned into a National park. I do not want to see dense housing developments near the canyon and surrounding wilderness-like area. I am concerned about the Forest Service swapping land with private developers. In addition, I think that the entire study area should be a refuge for wildlife -- free from hunting and cattle grazing. Only NP status will accomplish all those objectives. I also think it is good to restrict other activities like off-road mountain biking and ORV use, which fragment and degrade habitat. I am a hiker. NP status is entirely compatible with non-harmful activities like hiking, jogging and birdwatching.	
I support the protection of Walnut Canyon and expansion of the area that is currently protected. I support designation as a National Park. I do not want to see homes or other development in this area.	
We strongly object to enlargement of the Walnut Canyon National Moument. It has already been enlarged. All of the artifacts in the area are being preserved and we agree that they must. Prior to the last expansion the area surrounding the Monument was multi use. We all could use the area for hiking, biking, site seeing, camping, horseback riding and more. When the area was expanded, the fences went up and the public was no longer able to use the area. If the area is expanded further, more land will be fenced off and taken from the public. This land should be available for everyone to use and not have its use restricted to one group or purpose. When the Monument was expanded the last time, it was professed to bring in large amounts of revenue to the city and the area. Doubt that there is any evidence of that. If the point is argued again I don't believe there is any data to support that position. We love Walnut Canhyon. We love our multi use forests that are available for all the public to use and enjoy. We respectively request that expansion is not approved.	
With the recent destruction of the Schultz fire and the Hardy fires, it is more imperative than ever to protect our natural resources. I am a big supporter of the park service and all they have done for our beautiful country. These areas belong to all, not to wealthy landowners and no trespassing signs. Please keep the area open for hikers and bikers, and no fires please. Thank you very much.	
We enjoy walking in the Walnut Canyon areas and on the trails. I don't think it is necessary to include them in the National Monument boundaries where we would have to pay for access in the future. The areas are well cared for and protected as they are.	
I don't recommend that we turn over the Walnut Canyon park area to the national park service. It is a beautiful area for everyone to enjoy without having to spend money - it is there for everyone's enjoyment and is one way that everyone can enjoy the outdoors wihtout having to pay for it. Also, as Arizona taxpayers, we contribute in some way to the area maintenance. The federal government would probably charge considerably per person to enter the area. The Walnut Canyon should be open to everyone, not just those that can afford to pay. Hikers, horseback riders, joggers, families all enjoy the area.	
Walnut Canyon is beautiful and a significant archaeological site for the Flagstaff area. If acreage is added to protect and preserve it I am all for it. Access by the public should be restricted to minimal impact: designated walking and mountain biking trails, perhaps horse trails. No motorized vehicles should be allowed in the area. I have lived in Flagstaff over 20 years and in northern Arizona for 40, and it amazes me how much damage is done to the forest floor over the course of a year or two just by people walking on trails and riding mountain bikes. Trails are worn deeper and deeper by this traffic causing erosion to the soil	

I favor the continued management of the entire study area by the US Forest Service. The existing, recently enlarged, Walnut Canyon National Monument, protects the key archeological areas for which the monument was created. To add to the monument again would severely and needlessly limit recreational opportunities for the citizens of Flagstaff and Northern Arizona. The USFS is more than capable of managing the area for multiple use and with the soon to be implemented Coconino National Forest Travel Management Plan any concerns over OHV use will be, can be, dealt with.	
Expansion of Walnut Canyon N.M. Boundaries have not been justified, and it jeopardizes current recreational use of the area. A need for change has not been established, and therefore no change is warranted. Absolutely no on Walnut Canyon N.M. expansion.	
Walnut canyon has more than enough land. I stronglhy opose any expasion of park bounderies	
I think the best thing you can do is do not break what is not broken. Please resist the urge to keep taking away recreational oppportunities. The forests belong to us, not you or your agency. Is simply enjoying nature's beauty without someone from the government breathing down your neck too much to ask?	
To whom it may concern: The proposed expansion of Walnut Canyon National Monument could be appropriate, if done properly. In particular, existing land uses should be maintainted, and access for the public should be maintained. Hunting, hiking, and mountain biking are some of the most important public values for this part of the Coconino NF, and that should not change if the land changes to NPS ownership. My experiences with the National Park Service, both privately and professionally, have led me to believe that many NPS personnel typically have negative attitudes toward consumptive recreational activities like hunting and fishing. They tend to take a "preservationist" attitude as opposed to a "conservationist" standpoint. Hopefully that will not be the case in this instance. If this change occurs, I hope that NPS personnel will respect the existing land uses and allow them to continue. Thank you for the opportunity to comment.	
Flagstaff is expanding and Walnut Canyuon is the next step for development. The only way to protect the Canyon and its surroundings is to make it a national park. It would be a wonderful addition to this area's outdoor attractions and would go far to protect water, wildlife and other resources. Make Walnut Canyon a national park!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!	
I am in favor of leaving the area around the Walnut Creek National Monument as Forest Service land, but with a moratorium restriction on building, so that it remains as recreational public lands where people can hike, bike, hunt, or camp with the proper permits.	
am a member of several environmentally concerned groups. Having visited Walnut Canyon many times, I have to say that enchanting and wonderful place must be made a National Park, along with whatever surrounding land needs to be brought in. This place is too special to allow it to be used for housing or anything else that does not maintain the Canyon's beauty.	
Please make Walnut Canyon a National Park.	
I believe the most appropriate designation for the Walnut Canyon study area would be to make it a National Park. This would provide the most protection for the area. Some may feel that this would be too restrictive. I believe that a national park could be created like Organ Pipe (?) near Tucson. It would permit locals to enter free of charge; it would provide other points of entry that could be accessed from the city; and it would still allow most activities like hiking, bicycling, horse back riding. It might limit things like shooting or mineral collecting, but those would be few.	
I am writing to support the expansion of the protected area of Walnut Canyon, and I support its proposed designation as a National Park to provide it with maximum protection. I have visited several Native American archaeological sites in the southwest (Hovenweep, Mesa Verde, Wupatki, Montezuma's Castle, Tuzigoot . . .) and Walnut Canyon is among the most interesting and impressive, with remarkable access to the once inhabited sites. It is also a site of stunning natural beauty, and a critically important habitat for endangered species and larger animals who need a considerable range relatively free from encroachment. I believe that National Park status will ensure the preservation of this vital site, and it will contribute to making it better known, with positive benefits for our community in Flagstaff. With the future of many state parks hanging in the balance -- one thinks of the sad fate of the Homolovi Ruins -- it is incumbent on us to do everything possible to protect a site of this importance, and one that is so close to a town of significant size. Frankly, I don't understand the concerns of those who believe that residents of Flagstaff will find their recreational use of the area prejudiced by the expansion of Walnut Canyon and its potential designation as a National Park. I regularly visit National Parks in the region, and there are wonderful opportunities for hiking, birdwatching, wildlife viewing, photography, and other activities. In fact, the support for the National Parks often enhances the available services. Considering that Flagstaff is blessed with urban park space and trails in all directions, as well as the diverse opportunities offered by the National Forests and other nearby sites, it would seem that we could agree that a site as distinctive as Walnut Canyon merits special status. Such status would be a boon for our community too. Sincerely,	
The Walnut Canyon Study Area needs to be permanently protected against development. I believe the best way for this to happen is to make it a National park.	
I would you to please Walnut Canyon Study Area into a National Park. This is a simple and straight request.	
Please preserve this area as a study area permanently. I really valuve this area for recreational purposes and would hate to see it developed with apartment buildings and streets.	

To all who are concerned; I as a tax payer and voter want to save walnut canyon and urge Coconino county, the city of falgstaff, as well as our State and federal Senators and Representitives to vote to make Walnut canyon and its surrounding areas a national park	
Please allow the walnut canyon recreation area to become a national park	
I have learned that the Sierra Club has submitted a revised recommendation for the future of the Walnut Canyon Study Area. It is well thought out and meets the concerns of most of the people with whom I have spoken. It is a perfect solution to a difficult problem and I am totally in support of the Sierra Club's revised recommendation.	
the proposed roads and neighborhoods would be a disaster. Making walnut canyon a national park sounds like the best option. However, it would also be unfortunate to locals if access was limited or restricted through a permit system.	
I would like to see the Walnut Canyon area protected from any and all development. I believe it is easy to totally protect something and keep it pristine, and use it for its esthetic value. If at some point the people decide to change that and use it for something else, so be it. But it sure is hard to change your mind if you do things in the reverse order. So along those lines, I would like to see it preserved as National Park or Monument. If it is left with the USFS, they will eventually trade it away because some millionaires want that. I know, I live near Walnut Canyon and I used to border national forest, but because of trades, I am now a half mile away from it. It will continue this way until there are houses at Fischer point or a freeway from the airport. Thanks.	
I request the entire Walnut Canyon Area be permanently protected from development - perhaps designated as national treasure/park not under Forest Service	
WALNUT CANYON DESERVES NATIONAL PARK STATUS! Walnut Canyon is a beautiful and fragile ecosystem, and should be available for unmotorized recreation for our citizens, tourists, and school children for generations to come. It is so close to the city, it would be a shame to see it destroyed by home building or highways. As the city grows it will become an important part of the city green belt and will make for a healthy environment for everyone. Walnut Canyon deserves PERMANENT PROTECTION. Putting it under the NPS is the best solution.	
To Whom It May Concern - As a past resident of Flagstaff, I was blessed to be located where I could hike or ride horseback directly into the Walnut Canyon Monument. The Study area as well as the monument were so beautiful and seemingly remote, yet easily within reach from town. It is an area that should not be exploited for capital gain nor graded and paved as an alternate expressway. Please make every effort to preserve the Study area as a National Park. Doing so would preserve the area in its natural state for future generations to explore and for the wildlife to survive with minimal intrusion. Sincerely,	
Please make the area a National Park. It should be fully protected, and there is no other way to be sure that developers are kept out permanently.	
see attached comments	Walnut Canyon-Comments.docx
I am writing in support of the protection of Walnut Canhyon National Monument and the surrounding areas through the establishment of a national park. Walnut Canyon NM is an important component of local tourism and this would only be enhanced by the establishment of a national park. Furthermore, the area surrounding Walnut canyon is beloved by many in the area, providing hiking, bike trails, rock climbing and wildlife watching. The preservation of Fisher Point and Sandy's Canyon is an absolute necessity for Flagstaff's local identity. We cannot allow this area to be sacrificed to serve the needs of the the few who would actually benefit from its development. The city and county are both behind efforts to permanently protect this vital area of Flagstaff's future and it is time we see this land transferred out of the Department of Agriculture and into the Department of the interior. Thanks.	
that our treasured by a large part of the community. Between the varied geology of the canyon walls, sandstone bluffs, and the many marine fossils embedded in the limestone to the overlapping habitats that provide concentrated biological diversity and contain a high concentration of sensitive species along with providing important wildlife corridors to the archeological structures and artifacts make this an that should be will protected The entire study area contains these assests and the entire area should be permanently protected against development. Thousands of people in the community use these resources for recreation and study and having access to these important areas are the reason why so many people continue to live in Flagstaff despite the high cost of living. The entire study area should be made into an addition to the Walnut Canyon National Monument.	
I'm writing this letter in response to the special study being done on the Walnut Canyon Study area, and the apparent possibility of 30,000 acres near Walnut Canyon National Monument being incorporated and controlled by the National Park Service. I understand the federal government has mandates to study different management possibilities for what ever reasons they deem necessary, but the area that is being considered on Campbell Mesa and all of the area north, west, and south of Walnut Canyon is being managed very satisfactorily by both the USFS as well as the adjacent neighborhoods in the City of Flagstaff that use these areas on a daily basis throughout the course of the year. The trail system on Campbell Mesa, as well as the Arizona Trail Segments that travers the area from Marshall Lake through the Fisher Point area to the I-40 corridor are in excellent condition and used frequently, but are certainly not overcrowded. The hikers, cyclists, horse riders, as well as archery hunters, treat both the trails, land, and each other courteously and respectfully. These trails are the closest link to outdoor recreation that the Walnut Meadows and Continental Country Club neighborhoods can access without having to drive across or through town to increasingly crowded areas. The only land management	

objectives that should be worked towards at this time would be to limit ORV and ATV usage to maintained roads only, restrict or ban camping in the area, and make sure that the USFS doesn't sell out or trade the land to any entities that might possibly try to develop within the parameters of the study area. For the most part, this land should be left alone and managed as it has for the last several years. Do the right thing and recommend that non-motorized recreationalists, including archery hunters be able to use the lands within the study area without being restricted or subjected to fees that we as citizens are already contributing to. Thank you for your heartfelt consideration of these matters. Sincerely,	
The current boundaries of Walnut Canyon National Monument are no longer sufficient to ensure that the pressures of urban development will not adversely effect the unique ecological, sacred and archeological nature of the Monument. 2. The best way to save the Walnut Canhyon National Monument is to designate it a National Park. 3. Designating the 30,000 acres around the monument outlined by the Friends of Walnut Canhyon and others will ensure that: a. The long term integrity of Walnut Canyon will be preserved. b. The riparian corridor and Walnut Canyon watershed will be preserved. c. Five native rare plant species will be protected. d. The habitat of the Mexican Spotted Owl which has been designated as critical habit within the Monument will be forever protected as well as important breeding habitat of the Peregrine Falcon and Northern Goshawk. e. Unfragmented habitat and movement corridors for elk, pronghorn, mountain lion, black bear, wild turkey and other wildlife will be preserved and developed. f. Precious old growth Ponderosa Parklands above the canyon rim will be restored and protected to presettlement conditions. g. The introduction and spread of non-native plants can be curtailed. h. Aesthetic values, recreational use, natural scenery, natural quiet, and night time sky views will be preserved. i. Native American cultural sites and sacred places throughout the canyon will be saved. j. Early settlers? Historical cabin sites and carvings and historical logging remains will be saved. Please consider making Walnut Canyon a National Park - we have enjoyed visiting and "playing" in National Parks throughout this country. Saguaro National Park is a good example of how a National Park can provide recreational activities while helping us all to enjoy the natural beauty. We need to think far into the future and save Walnut Canyon forever.	
I think expanding WCNM would bwe a good thing. How much it would restrict the uses already occurring is one of the biggest concernws - would it reduce to a large extent the availability of hiking and biking? Also, the area is vulnerable to increases in tree mortality from future droughts similar to that in 2002, which resulted in extensive dead trees standing or fallen. Because of the easy access, many of those dead trees have been removed (by the public?) and reduced the amount of fuelwood for fires. Extending the Monumen would eliminate that option for people, and would likely not be easy for the Park Service to get permision to cut snags, even if it is a way of reducing the fire hazard. That is one aspect that I would be concerned about.	
*I wish the extra acreage in the Walnut canyon study area to be additionally protected from development. Old growth tree and animal protection is desireable. Push Alt 17 outside. Consider managing like Suhjuaro Nat. Mon. west.	
As residents of the Walnut Ridge area of Flagstaff, our entire family is very interested in the outcome of the Walnut Canyon study. We use much of the study area, especially Campbell Mesa, for biking, running, and hiking. Our children ran for Sinagua High School (now Flagstaff High School and University of Oregon), and they use the study area extensively for their training. We also know of several college teams (NAU and U of Oklahoma included) and collegiate and world-class individual athletes who also train in the study area. We are in total support of any efforts to protect the study area by preventing the use of motorized vehicles, including atv's, as we witness first-hand the destruction to the soil, trails and plants that they cause. We urge you, however, to continue to allow the responsible activities of biking, hiking, running, walking, and other environmentally friendly sports in the Walnut Canyon study area. Additionally, access to any expanded Walnut Canyon area should be free of charge for these activities, as they are now Thank you for your consideration.	
Walnut Canyon Study Area Comments The landscapes of the study area incluude the tributary canyons of Fay and Skunk, ridges and mesas, and upper Walnut Creek. It is a wonderful natural environment right on the edge of Flagstaff. The naturally wild character of this area should be preserved and protected from the danger of being chopped up by road and utility expansion or nibbled away by land exchanges. Today, one can follow hiking trails from Walnut Canyon National Monument to walk west for over 10 miles to Lake Mary Road without ever crossing a road in between. Exploring the north rim of Anderson Mesa or the bottom of Walnut Canyon takes one to a natural and wild environment that is nearby yet remote in its isolation. The lands of the study area comprise contiguous natural habitat with natural corridors, wild creatures of many sorts, and wonderful natural resources. I believe there are several aspects of the natural and human history within the study area that are quite unusual and offier a special opportunity for use as a resource for scientific study and public education. The southwestern ponderosa pine forest is a unique natural environment of national importance that could use more study and understanding. All across the western states, forest ecosystems are coming under huge stress from the effects of drought related to climate change, fire suppression, and grazing. With work beginning on the Four Forests initiative, a vast effort at forest restoration on a landscape-wide scale across four of Arizona?s national forests, there will be a great need for public education, understanding, and appreciation of this ecosystem. Our intention to restore our natural forests is a story of national and even international importance. How about designating the study area as Ponderosa Forest National Monument, with a designated mission to further scientific study and public education of this ecosystem and the efforts being made to restore it? A visitor center at the site of the proposed new ranger station on Lake Mary Road could be dedicated to telling this story. Within the study area are thousands of acres of ponderosa forest including a few small sites of unlogged old growth, sites related to 19th century railroad logging, and many acres of woodlands in various stages of regrowth and restoration following 125 years of fire suppression, grazing, logging, and various thinning treatments. This area at the edge	

of Flagstaff, so close to NAU with its forestry school and Ecological Restoration Institute as well as the Rocky Mountain Research Station, would be a perfect location for scientific investigation and equally important public education. The study area has intermingled natural plant communities of mesa-top ponderosa forest mixed with oaks and junipers, grassy meadows among the trees and on some canyon bottoms, north facing canyon slopes providing a cooler aspect to Douglas fir and aspen, south facing slopes with junipers, pinyon and associated plant species, and deep and narrow canyon bottoms with examples of rare riparian vegetation. This is a biotically diverse area of contiguous habitats, an important national asset that definitely deserves special protection	
Don't build any new roads across Campbell Mesa or near Fisher Point.	
I live off Old Walnut Canyon Road and am interested in preserving this area for future generations. I walk OWC every day and enjoy the beauty and the wild life there and on Cam,pbell Mesa. Please do all possible to preserve this area as it is. Enough damage has already been done with 4 wheelers and other off road vehicles.	
Now we seem to be at the end of this major comment period and I have yet to see convincing arguments for a do nothing strategy. Those who favor current levels of access, regulation and protection seem confident that no changes to the status quo will occur in the future. I, on the other hand, am convinced that the US Forest Service and Arizona State Land Trust are very vulnerable to pressure from privatization and land trades. I am in favor of moving these 30,000 acres to the National Park Service for maximum protection. Thank you.	
I would like to see the walnut canyon study area designated a national park, with current recreational uses still allowed.	
As a local resident of the project area and a previous intern of Walnut Canyon National Monument, I have several concerns about the future of the lands surrounding Walnut Canyon. I have participated in ecological inventories of Walnut Canyon's tributaries for the City of Flagstaff's Stream Team (these documents should be aquired by the organizers of this study, if they have not been already: the inventory was a voluntary effort led by local scientists and recreation specialists). I also frequently visit the area by foot, horse, and bike, especially the western portion. I advocate for a Wilderness designation in this area, and do not support an expansion of the National Monument. This is a large, mostly roadless area. It exceeds the size required for a Wilderness designation. I have observed that National Monuments, especially new designations, attract large numbers of visitors (often with an expectation of trash service), while Wilderness Areas do not. The biggest fears that people have about Wilderness designations in the study area concern bicycles, grazing, and forest thinning. This should not be a problem, given the exceptions allowed in other Wilderness Areas. Recently created Wilderness Areas in Colorado have designated exceptions for "historic" recreation uses, including heli-skiing. If heli-skiing can be allowed in a Wilderness, I see no reason that the dominant "historic" recreation in this area -- mountain biking -- can't be allowed if these lands were to be designated as Wilderness. Other Wilderness Areas, including several in California, have allowed grazing as a "historic" use. The same exception can be made for the moderate levels of grazing present on the south side of the study area. Any proposed forest thinning would have to be conducted according to the "minimum tool" allowed under the Wilderness Act. When Walnut Canyon expanded in the 1990's, the management did not have enough staff to monitor the larger area and feared an influx of new visitors to areas far from the visitor center. Their response was to fence the new perimeter and keep people out. This addressed their mandate to "preserve and protect", but ignored the desire of local landowners to access their public lands. The Study Area is a large region, mostly frequented by locals, and, although extremely sensitive areas might deserve extra protection, the rest of the region will be best protected by allowing the locals to continue to take care of it, without attracting extra visitation from people with no vested interest in caring for the land. I never see trash in the area between Bow & Arrow Wash and Fisher Point, western Walnut Canyon, and Marshall Lake. These areas receive a large number of visitors, primarily by bike, horse, and foot, on trails associated with the Arizona Trail system. They have no developed services (trash, restroom, pavement, or potable water). Everyone is aware of what they must do to get themselves safely in and out, and why to keep the area clean for when they return. I do not believe that the National Park Service is able to increase their staff to account for the extra visitation that has come, for example, in the wake of the Aqua Fria National Monument designation. That region has become an ORV paradise, at the expense of some of the resources that invited "protection" in the first place. The Flagstaff area receives a large number of international tourists, many of whom do not understand how fragile our ecosystem ism, and some who are seeking archaeological "souvenirs". Not all of our visitors are irresponsible, but it doesn't take many to make a large impact on our forest. Ironically, the perception that people must access the area through Pine Canyon, a gated residential area (though there are many more accesses), has limited the number of daily visitors the last few years. Meanwhile, the widely scattered accesses that exist behind several neighborhoods create a dispersal of recreational visitors, and it is therefore very easy for local residents to find solace and natural quiet in the Study Area. A National Monument designation might have the opposite effect. I've observed ecologically unique features in the following areas. They are not receiving any excessive degradation at this time, mostly because of their inaccessibility to elk and their limited access (narrow canyons, steep walls): *hanging gardens, aspen, and old-growth Douglas fir in the lower end of Skunk Canyon *diverse riparian habitat in western Walnut Canyon *aspen and narrowleaf cottonwood in Sandy Canyon, north of "the Pit" area *old growth ponderosa pine forest in Sandy Canyon, north of "the Pit" area and along portions of Arizona trail between Sandy Canyon and Marshall Lake *Cherry Canyon area, riparian vegetation and cultural sites	

The City of Flagstaff's master plan for the Flagstaff Urban Trails System (FUTS) includes several planned FUTS trails that are partially within the boundaries of the Walnut Canyon Study Area: .. Walnut Canyon East Trail (sections 20, 21, 29, 30) .. Walnut Canyon West Trail (sections 25 and 30) .. Hoffman Tank Trail (section 36) .. Lake Mary Trail (along the east side of Lake Mary Road, south of J.W. Powell Blvd) .. several shorter connector trails planned in conjunction with the above trails A copy of the FUTS master plan is attached. No existing FUTS trails are apparently within the boundaries of the study area. FUTS is a city-wide network of non-motorized, shared-use pathways that are used by bicyclists, walkers, hikers, runners, and other users for both recreation and transportation. The system connects neighborhoods, shopping, places of employment, schools, parks, open space, and the surrounding National Forest, and allows users to combine transportation, recreation and contact with nature. FUTS trails are operated and maintained by the City of Flagstaff. At present there are just over 50 miles of FUTS trails in Flagstaff. The overall master plan shows about 80 miles of future trails, to complete a planned system of 130 miles. The affected trails have been planned, in part, to improve pedestrian and bicycle connectivity and enhance transportation options for residents of Flagstaff's southeast neighborhoods. Please acknowledge and consider the plan for these trails in the Walnut Canyon study. Thank you for the opportunity to provide this information. Please do not hesitate to contact me if you have questions or need further information.	
The Walnut Canyon Study Area is of enormous importance to the quality of life for many residents of Flagstaff, particularly those living in east Flagstaff. The open space and trail systems that exist within the study area are widely used by a variety of recreationists. I've seen weekend visitors to Flagstaff riding their ATVs on Walnut Canyon Roads, as well as world-class runners training on Campbell Mesas' high altitude trails, all happily relishing the outdoor experience this area provides for those who come. I have used these trails on an almost daily basis for 7 years, as a runner, hiker, and dog walker. I plan to snowshoe the trails on Campbell Mesa and those adjacent to Old Walnut Canyon Road this winter. These trails are unique in that they weather the weather well. The sandy soil and healthy vegetation allow for use throughout the thunderstorm season, while not showing signs of overuse or flooding. Anyone who has walked the Campbell Mesa trails during the summer rainy season will attest to the incredible wildflowers growing there. The variety, color, and duration are unbelievable. Because the study area is uninterrupted by development or multiple road systems, wildlife populations thrive here. I've seen elk, coyote, and many species of birds. The proximity to Flagstaff and residential communities make this area an irreplaceable and unequaled part of our eastside community. The short distance to forest or monument land make exercise and recreation a daily reality for Flagstaff residents. The open space surrounding most of Flagstaff arguably is one of this town's finest and most valuable assets. Let's protect it! Please, don't change the current accessibility of the Campbell Mesa and Walnut Canyon land. This land is critical to the health, beauty, and quality of life for all of Flagstaff! I urge you to protect this land, in its existing boundaries, and don't consider selling, trading, exchanging, or building within the monument or forest borders. Instead, maintain its existing quality and conserve the biological diversity and social importance for citizens and visitors to Flagstaff. You will continue to see many smiling faces on the trails if you do!	
Please permanetly protect Walnut Canyon by making it a national park. Thank you.	
Dear Superintendent Chung and Supervisor Stewart: I am writing on behalf of the Sierra Club?s Grand Canyon Chapter and our 12,000 members in Arizona to include supplemental comments on the Walnut Canyon Study Special Study recently initiated by the U. S. Forest Service (USFS) and the National Park Service (NPS). We understand that some of the lands identified in the expansion proposal may have sensitive and/or significant archeological resources. We encourage the inclusion of those areas in an expanded National Park Service monument. For areas in the expansion lands study area that do not have sensitive or significant archeological resources and that would not be consistent with the National Park Service unit, we would support management as a National Conservation Area or other similar protective designation in order to protect the other resources, limit possible land exchanges, and to provide a buffer between the Monument and surrounding lands. Thank you for considering our comments. Please keep us apprised of any developments relative to this matter. Sincerely,Jim Vaaler, Chairperson Sierra Club/Grand Canyon Chapter	

ATTACHMENT 3: ORGANIZATION, AGENCY, AND OTHER RESPONSES AND ADDITIONAL DATA

THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT
5000 W. CAREFREE HIGHWAY
PHOENIX, AZ 85086-5000
(602) 942-3000 • WWW.AZGFD.GOV
REGION II, 3500 S. LAKE MARY ROAD, FLAGSTAFF, AZ 86001

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DEPUTY DIRECTORS
GARY R. HOVATTER
ROBERT D. BROSCHEID

RE: Walnut Canyon Study Area Special Study
DATE: May 7, 2010

To Whom It May Concern,

The Arizona Game and Fish Department wishes to respectfully submit the following regarding possible management options for the area surrounding the current Walnut Canyon National Monument (i.e. the Walnut Canyon Study Area, WCSA):

1. The Arizona Game and Fish Department (AGFD) supports management options for lands within the Walnut Canyon Study Area that will ensure the protection of this area from development in perpetuity.

2. AGFD supports continued mixed recreational use within the WCSA, including hunting and other appropriate uses (e.g. wildlife watching). The Department has determined that hunting, particularly on Coconino National Forest lands in those portions of the Study Area south and southwest of the current National Monument, functions as an important tool for wildlife management and for minimizing urban human-wildlife conflicts in areas such as the neighborhoods adjacent to Continental Country Club. Hunting in the WCSA regulates the elk herds that regularly move into the Continental area, causing damage to the golf course and homesites and producing frequent and unpleasant close encounters with residents which the Department is often called to address.

3. The preference of AGFD would be continued U.S. Forest Service ownership and management of the greater WCSA lands outside current Monument boundaries, though the Department could also support National Park Service management provided continued support for items #1 and #2 above. In particular we would advocate for the continued allowance of hunting in the WCSA. Hunting is allowed in various other National Park Service units in the United States by federal statute, and can thus be compatible with a range of other recreational uses and aesthetic values associated with National Parks if appropriately regulated.

4. AGFD encourages the Walnut Canyon Special Study to explore the idea of creating a Walnut Canyon "National Conservation Area" (NCA) or some comparable arrangement as a possible solution to management of the WCSA. This alternative was proposed to the Department by a local citizen and has been used as a management model for many Bureau of Land Management lands. NCAs can accommodate hunting (e.g. Gila Box Riparian and Las Cienegas National Conservation Areas in Arizona) and ensure protection of the WCSA from development in perpetuity, and the Department advocates

AN EQUAL OPPORTUNITY REASONABLE ACCOMMODATIONS AGENCY

that both of these conditions be included if National Conservation Area designation is pursued.

5. If a National Conservation Area or similar management alternative is considered, the Arizona Game and Fish Department advocates the possible inclusion of Arizona State Land Department (ASLD) sections within the WCSA as part of the NCA. In the aforementioned citizen's proposal to Arizona Game and Fish (see item #4), it was recommended that ASLD would "retain all rights to its lands within the Study Area." However, the Department does not support the latter provision. AGFD views the potential for urban development on the included ASLD sections as one of the principal threats to the ecological integrity of the WCSA, and development on these sections could also lead to an increase in human-wildlife conflicts as described in item #2 above. Possible mechanisms for acquiring ASLD sections in the WCSA could include exchange for less sensitive USFS or NPS lands elsewhere, or reclassification for conservation purposes through the Arizona Preserve Initiative and subsequent purchase at ASLD auction.

6. AGFD supports managed OHV use in the WCSA, preferably as described in the Coconino National Forest's revised Travel Management Rule. The revised TMR allows for the restricted use of OHV's by hunters for retrieval of downed and tagged game animals only, and does not permit general OHV access for scouting or hunting. The Department is concerned that a total ban on OHV use would lead to a decrease in the number of elk taken by hunters and an increase in the elk population in this area, leading in turn to more human-wildlife conflicts as described above in item #2. AGFD would consider alternatives to TMR implementation for selected portions of the WCSA, if for example it were shown that OHV use presented the clear potential for damage to critical ecological and/or cultural resources there.

The Arizona Game and Fish Department wishes to acknowledge our appreciation for this opportunity to provide input to the Walnut Canyon Special Study. Please do not hesitate to contact me if you desire further information or clarification. Thank you.

Sincerely,

Mark Ogonowski

Wildlife Specialist II – Urban Wildlife Planner
Arizona Game and Fish Department
Region 2 Office
3500 S. Lake Mary Road
Flagstaff, AZ 86001
928-214-1252

July 20, 2010

HDR/ e2M
Attn: Walnut Canyon Study Area Special Study
9563 South Kingston Court, Suite 200
Englewood, Colorado 80112

To whom it may concern:

I am a lifelong Flagstaff resident who has lived in the Walnut Canyon Study area since 1977, I was 12 when we moved to the "country". At the time, we had no neighbors. Many kids would have resented moving to isolation at that age. I was excited about the move. I spent countless hours riding the trails on my motorcycle, got my first horse, walked many miles and enjoyed the solitude. Years later, I married and built a home in the same area. My husband and I feel this is the best place in the world to be. He enjoys hunting, walking, riding ATV's and basically just being engulfed in nature all the time. We have raised our daughters here. One of the best assets this area has to offer is the beauty it has and that anybody can enjoy it as public use land. Although we have not liked the increase in traffic and people over the years, we would much rather cope with that than have the privileges of enjoying this area ourselves stripped away.

We had no idea of the issue at hand until our neighbors mentioned it only a few months ago. I find it difficult to believe that such a major change could affect our everyday lives, yet we knew nothing about it. We are not politically involved people, by choice and on purpose. It upsets me to know that something of this magnitude could be in the works, right under our noses, by the suggestion of somebody that has no real stake in such a change. Every day there are so many people who come out here to enjoy the same activities we do and I am certain that they probably don't have a clue that things could change by turning into a National Park. We have recently noticed an increase in the horses being trailered here to ride. I feel this is because many other places have been encroached upon by developments. This is still a close enough place to come and has many riding areas.

I once experienced first-hand what it would be like to have the area be under National Park supervision when I was asked to leave the place I was riding my horse. The park ranger told me that my horse could ruin the terrain of the park area. As if my horses' hoof prints would do more damage than the thousands of elk hooves that run in the park do. The elimination of hunting in this area would be detrimental to the vegetation because the elk population would grow to unhealthy herd sizes. We have so many elk now that they have been known to come into my barn with the horses. In all my years, I have not seen (or noticed) a northern goshawk or spotted owl. I know they exist, but they can fly to trees in other areas, over fences and are safe from people. People, on the other hand, would definitely be affected by fences, boundaries and management authority changes.

My theory is that "bigger is not necessarily better". The Study Area includes more than 30,000 acres of land. This is more than twice the land that was recently burned in the Schultz fire. That is a ridiculous amount of recreational land to lose! With the shrinkage of areas for people to retreat to I believe that Flagstaff would begin to feel the repercussions. Not having places close by to escape to would adversely affect people physically, emotionally and even spiritually. The federal government has more than enough troubles right now without taking on more responsibility. The US Forest Service and Arizona Game and Fish Department have done a fine job in teaming up to manage this area in the past. There are many other clubs and groups that have worked together to contribute to the positive aspects of this recreation area as well. Wildlife trick tanks, blocking of an excessive amount of trails, making designated parking spaces and the placement of access gates in the fences are just a few examples.

I would encourage and propose that the Study Area be designated a Conservation Area instead of a National Park. This would be a suitable way of having the "best of all worlds". It would keep the land from being developed in future. It would keep the land open to the current uses that so many people have become accustomed to using and enjoying. It would keep healthy management for the wildlife, in turn maintaining healthy vegetation.

In closing, I would like to invite you or anyone else in Washington D.C. to come take a horseback ride or a hike with me on this wonderful, unspoiled land. It ***is*** simply amazing, yet it is not ***anything that the current Walnut Canyon Monument doesn't already have***. I thank you for your time and consideration in this matter.

HDR/e^{2}M
ATTN: Walnut Canyon Study Area Special Study
9563 South Kingston Court, Suite 200
Englewood, CO 80112

Dear Study Team,

Let me introduce myself as a person who has participated in the discussion about the Walnut Canyon Study Area since early 2002. I write to you as an "unaffiliated resident" of Flagstaff who has a keen interest in how the Study Area will be managed. This letter is split into several sections: background, genesis of a proposal for management, and the merits of the proposal. The proposal itself appears as a separate document.

Inadequacy of the *Forest Plan*

Presently, the federal land that lies within the Study Area but outside the National Monument is managed under the *Forest Plan* for Coconino National Forest. Just keeping that land under the *Forest Plan* will, I believe, *not* work politically. The possibilities of congressionally designated boundaries and congressional withdrawl of the land from exchange (and hence from development) have been raised, and the local governments will push for such congressional action. (In my view, that's good.) The City-County joint resolution of December 2002 (copy enclosed) clearly stated the goal of protection "in perpetuity," and the *Forest Plan* cannot provide such protection. (The Forest Service may revise the *Forest Plan* whenever it wants to and may—under a revised *Plan*—decide to exchange land whenever it wants to.) Indeed, that failure of protection "in perpetuity" is the reason the expansion issue was revived in 2002 (prompted by Forest Supervisor Jim Golden's letter to City Planner Ursula Montaña about the *Flagstaff Area Regional Plan* and changes in the Forest Service's attitude). Some federal management document other than the *Forest Plan* is certain to emerge.

Genesis of a proposal for management

At a City-County joint meeting in September 2002, Gene Waldrip (then the District Ranger for the Peaks Ranger District) proposed pursuing designation of the Study Area (exclusive of WCNM) as a National Conservation Area, to be administered by the Forest Service. [That option appeared also in the staff report, given at the same meeting by Jerry

Flannery, then Deputy County Manager. I will enclose a copy of the report. In exact detail, Gene Waldrip spoke about the Walnut Canyon Management Area. Later in 2002, the MA was amalgamated with the area that the Friends of Walnut Canyon had proposed for special protection; the combination became the WC Study Area.] I looked into the possibility of a National Conservation Area and its implications. What I saw looked excellent, and I have advocated for that solution ever since.

I enclose a copy of my proposal for a National Conservation Area in the Walnut Canyon Study Area (exclusive of WCNM), to be administered by the Forest Service. If you have questions, I will be glad to answer them; my contact information appears at the head of this letter.

Merits of the proposal

A. The community's goals

The City-County joint resolution of December 2002 captured the community's goals very well. I think it fair to summarize the two goals as follows.

(i) ***In perpetuity goal.*** Protect the land and resources of the Walnut Canyon Study Area in perpetuity (with development being the major threat).

(ii) ***Current Uses Goal.*** Maintain current public access and uses.

How well does my proposal meet those goals?

Regarding the in-perpetuity goal, Congress would designate the boundaries of the National Conservation Area and would "withdraw" the federal land from disposal under the public land laws. No federal land could be exchanged or developed without subsequent Congressional legislation. Thus the federal land in the NCA would enjoy the *same* high level of protection that Congress gives to national parks. [Congress uses a standard language to protect federal lands from exchange or sale. For example, the very same words were used to protect Black Canyon of the Gunnison National Park and Gunnison Gorge National Conservation Area. The bill was S. 323 of the 106th Congress.] In short, protection of the (federal) land and resources would be in perpetuity (in so far as such a goal is attainable).

Regarding the current uses goal, an NCA under Forest Service administration would retain the current managing agency and hence would maintain current public access and uses in a natural and automatic fashion.

Several current uses—hunting, grazing, mountain biking, hiking, and horseback riding—are reaffirmed explicitly in my proposal.

Initially, motor vehicle access would be governed by the Forest Service's policies under the Travel Management Rule, policies that are expected to be adopted officially in 2010. According to my proposal, however, those policies would be reviewed and—perhaps—be judiciously amended when the NCA's management plan is written (during the first two years of the NCA's existence). An advisory committee consisting of representatives from the constituencies that currently use, own, manage, or venerate the land within the Study Area will participate in writing the management plan.

Thus, all in all, my proposal would meet both community goals very well.

For all practical purposes, the Study bill signed by President Obama in 2009, which is your governing document, set the same goals. Thus my proposal would meet the goals set by Congress, also.

B. Other merits

My NCA proposal provides at least two significant benefits to the National Park Service, as follow.

(i) The proposal would meet the goals for protection that the NPS articulated in its internal document, *Walnut Canyon National Monument. Proposed Boundary Expansion: Areas Required for Long-term Protection of the Walnut Canyon "Environment,"* dated November 2001.

(ii) The proposal resolves, in favor of the NPS, the dispute over which agency has full administrative jurisdiction over the two 500'-wide strips of land along WCNM's paved entrance road.

In closing, I request

(1) that you include my proposal (in full) among the "conceptual management options" that you present to the Forest Service, the National Park Service, and the local governments and

(2) that you print the proposal (suitably condensed) in your second newsletter to the general public.

27 April 2010

Proposal for a National Conservation Area in the Walnut Canyon Study Area

Goals of National Conservation Areas

"National Conservation Areas (NCAs) are designated by Congress to conserve, protect, enhance, and manage public land areas for the benefit and enjoyment of present and future generations. NCAs feature exceptional natural, recreational, cultural, wildlife, aquatic, archeological, paleontological, historical, educational, and/or scientific resources." The defining quotation is from the website of the Bureau of Land Management, which administers a dozen or more National Conservation Areas. Three of those NCAs are in Arizona: Gila Box Riparian, Las Cienegas, and San Pedro Riparian. Any federal land management agency may administer a National Conservation Area.

Proposal (in broad outline)

The Walnut Canyon Study Area, exclusive of the existing Walnut Canyon National Monument (WCNM), will become a National Conservation Area, designated congressionally and administered by the Forest Service.

Noteworthy features and exceptions, which will be embodied in the legislation, are as follows.

Land

1. A jurisdictional issue will be settled definitively: the National Park Service will receive explicit and full administrative jurisdiction over the two 500'-wide strips of land along WCNM's paved entrance road, an area whose status has been the subject of debate.
2. The State Land Department will retain all rights to its lands within the Study Area.
3. Owners of private land in the two county islands near Lake Mary Road will retain all of their existing rights.
4. The inholders of the "Santa Fe dam" private property will retain all of their existing rights.
5. The private land in the extreme northeastern corner of the Study Area will be excluded from the NCA.
6. "Congressional designation" of the NCA implies, of course, that all federal land within the NCA is protected from exchange or development. Only an additional act of Congress can

change that status. Thus the federal land will enjoy the *same* high level of protection that Congress gives to national parks.

Uses

1. *Hunting.* The Arizona Game and Fish Department will retain management responsibilities where they currently exist. Thus, subject to prudent management decisions, hunting will continue where it currently exists.

2. *Grazing.* Grazing will continue to be permitted where it is currently permitted (subject to prudent management decisions).

3. *Hiking, mountain biking, and horseback riding* will continue as currently permitted (subject to prudent management decisions). [Implicit here is that the Flagstaff Loop Trail will be completed as currently planned and that appropriate connections will be constructed.]

Other uses will be addressed in the management plan.

Management Plan

Within two years of the establishment of an NCA, the Forest Service will develop a comprehensive management plan for the long-term management of the public lands within the NCA. Consultation with the NPS will be at the forefront. The Forest Service will consult also with state, county, and city agencies and commissions, with Native American tribes, with the public at large, and with current permittees. Integral to the process will be the formation of an advisory committee. The committee will consist of representatives from the constituencies that currently use, own, manage, or venerate the land within the Study Area.

Among the items addressed by the management plan will be motorized access and potential special protection for the western inner canyon (the canyon segment below the rim from the western boundary of WCNM to the meadow below Fisher Point).

More information about NCAs

As noted earlier, Arizona currently has three National Conservation Areas. The most recent addition is Las Cienegas NCA, located south of Tucson and established in the year 2000. A copy of the legislation that established Las Cienegas NCA can be found on the NCA's home page. The easiest route is this: type "Las Cienegas NCA" into Google and then select a site that starts with "www.blm.gov." Finally, click on "Public Law 106-538" in the right-hand sidebar.

A *Fact Sheet* for Las Cienegas NCA said "Activities that were permitted on BLM lands before the designation of the NCA are still permitted except for the filing of new mining claims and mineral leasing." In practice, you can think of a National Conservation Area as a multiple-

use area (in the sense that the Forest Service uses the phrase) that Congress has protected against land exchange and hence against development.

In September 2002, at a joint meeting of the Flagstaff City Council and the Coconino County Board of Supervisors, Jerry Flannery, Deputy County Manager, presented a staff report on options for addressing the future of the Walnut Canyon Study Area. Among the options was pursuit of a National Conservation Area administered by the Forest Service.

Perspective

An article by Anne Minard in the *Arizona Daily Sun,* 13 February 2002, had the following to say about remarks by Sam Henderson, who at that time was Superintendent of the Flagstaff Area National Monuments.

> The area doesn't have to become a park, Henderson says, to be managed effectively for the resource values at hand. "There are endless opportunities for compromises," he said. "There are alternatives that require no expansion at all."

In a spirit of seeking middle ground, I propose a National Conservation Area, designated by Congress and administered by the Forest Service.

Proposed by

 For "in perpetuity," see page 2.

Coconino County, Arizona

COCONINO COUNTY BOARD OF SUPERVISORS

Resolution No. 2002 - 65

A RESOLUTION OF THE COUNCIL OF THE CITY OF FLAGSTAFF, ARIZONA, AND THE BOARD OF SUPERVISORS OF COCONINO COUNTY, ARIZONA, SUPPORTING ADDITIONAL PROTECTION FOR LANDS SURROUNDING WALNUT CANYON NATIONAL MONUMENT, AND REQUESTING FEDERAL AUTHORIZATION FOR A SPECIAL RESOURCES AND LAND MANAGEMENT STUDY OF FEDERAL LANDS SURROUNDING WALNUT CANYON NATIONAL MONUMENT FOR PURPOSES OF DETERMINING HOW BEST TO PROTECT THESE LANDS FROM FUTURE DEVELOPMENT

WHEREAS, Walnut Canyon National Monument ("Monument") was established by Presidential Proclamation No. 1318 on November 20, 1915, and subsequently enlarged to protect certain prehistoric ruins of ancient cliff dwellings located in and adjacent to Walnut Canyon; and

WHEREAS, Walnut Canyon National Monument boundaries are contiguous to the City of Flagstaff and Coconino County and lands managed by the Coconino National Forest and the Arizona State Land Department as depicted on attached Exhibit "A"; and

WHEREAS, a series of recent, long-range land use management plans prepared by the City of Flagstaff and Coconino County, Coconino National Forest, and the National Park Service – Flagstaff Area Monuments acknowledge the greater ecological, social, economic, and cultural system surrounding Walnut Canyon National Monument; and

WHEREAS, the City of Flagstaff and Coconino County have prepared and adopted the Flagstaff Area Regional Land Use and Transportation Plan (Regional Plan), which delineates Urban Growth Boundaries, designates areas suitable for development within and areas suitable for Public Multiple-Use and Open Space outside the Urban Growth Boundaries; and

WHEREAS, the Regional Plan delineates growth and development of the City and County lands near Walnut Canyon National Monument and additional growth and development will impact lands surrounding the Monument in ways that may be detrimental to both resources contained on those lands and to the Monument itself; and

WHEREAS, lands surrounding Walnut Canyon National Monument are important to residents of the City of Flagstaff and Coconino County for providing values as listed in Exhibit "C"; and

WHEREAS, the public has expressed a desire to protect the existing Monument and to allow a continuation of certain uses on these lands, including but not limited to the uses as listed in Exhibit "D"; and

WHEREAS, the Flagstaff City Council and Coconino County Board of Supervisors have heard from the public their desire to protect these lands and resources in perpetuity while allowing current uses to continue;

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF FLAGSTAFF AND THE BOARD OF SUPERVISORS OF COCONINO COUNTY AS FOLLOWS:

SECTION 1. SPECIAL RESOURCES AND LAND MANAGEMENT STUDY: The United States Congress is requested to expeditiously direct the Secretary of the Interior and the Secretary of Agriculture to jointly conduct a Special Resources and Land Management Study (Study) of the Walnut Canyon Study Area, as depicted on attached Exhibit "B" and to supply funding for the Study, either through a separate appropriation or as part of existing Secretary of Agriculture and Secretary of Interior budgets. The purpose of the Study is to determine:

- The national significance of the resources of the Walnut Canyon area, as depicted in attached Exhibit "B", and if they would merit a special congressional designation;
- The range of alternative management options for managing and conserving these resources by either or both federal agencies, including but not limited to the suitability and feasibility of a boundary adjustment to Walnut Canyon National Monument, designation of the Study Area as a Preserve, designation of the Study Area as a National Park, designation of the Study Area as under perpetual management by the U.S. Forest Service including a permanent boundary, or any other designation that will accomplish both Federal protection in perpetuity and Public use and access for the Study Area;

SECTION 2. STUDY REPORT CONTENT The content of the Study is based upon the following parameters and desired results:

2.1. Parameters:

- The Study is to be jointly initiated and administered by the National Park Service and the U.S. Forest Service, with the use of a well-qualified, neutral environmental consultant.
- Local managers and local governmental jurisdictions will collaborate in developing a detailed scope of work for the study under the guidance of the consultant referenced above.
- Once approved by Congress, it is expected that this Study would be completed in 15 to 18 months.

2.2. Desired Results:

- Recommend the most desirable and feasible means for the future administration and management of the Walnut Canyon Study Area (Exhibit B).
- Recommend whether existing fiscal resources or land management expertise are sufficient, or whether special appropriations would be necessary to ensure protection of the area.
- Recommend the land management agency and management designation (or multi-agency designation) best suited to ensure in perpetuity protection for the Study Area, and ensure continued opportunities for public access, enjoyment, recreation and economic benefit.
- Recommend special designation of all or portions of the Walnut Canyon Study Area (Exhibit B).

PASSED AND ADOPTED by the Council of the City of Flagstaff and the Board of Supervisors of Coconino County this _____ day of December, 2002.

CITY OF FLAGSTAFF MAYOR

_____
Joe Donaldson, Mayor

ATTEST:

_____
City Clerk

APPROVED AS TO FORM:

_____
City Attorney

COCONINO COUNTY BOARD OF SUPERVISORS

_____
Deborah Hill, Chairman

ATTEST:

_____
Deputy Clerk of the Board

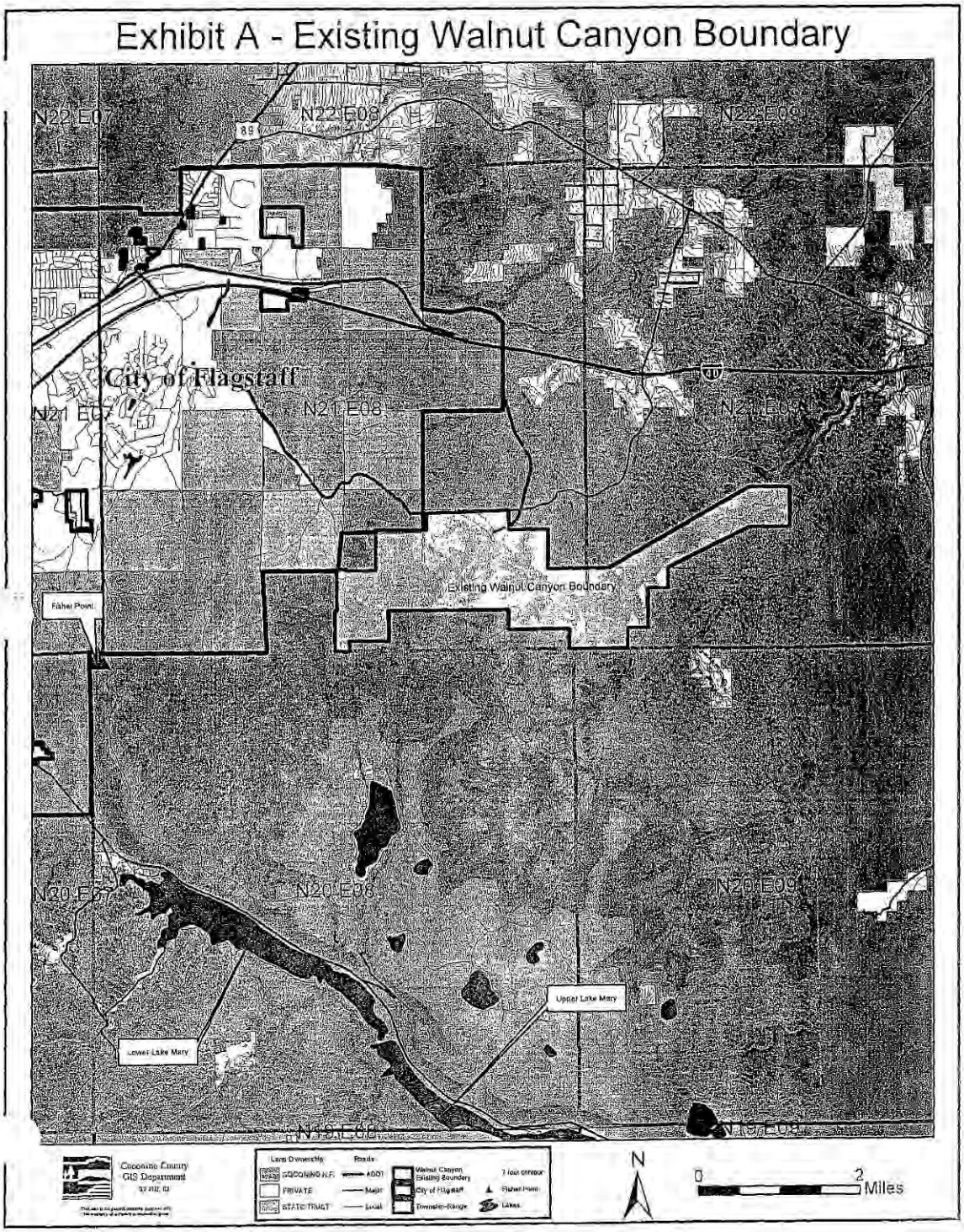
Exhibit A - Existing Walnut Canyon Boundary
N22 E07
N22 E08
N22 E09
89
City of Flagstaff
N21 E07
N21 E08
40
Existing Walnut Canyon Boundary
Fisher Point
N20 E07
N20 E08
N20 E09
Upper Lake Mary
Lower Lake Mary
N19 E08
N19 E09
Coconino County
GIS Department
Land Ownership
COCONINO N.F.
PRIVATE
STATE TRUST
Roads
ADOT
Major
Local
Walnut Canyon Existing Boundary
City of Flagstaff
Township-Range
7 foot contour
Fisher Point
Lakes
N
0
2
Miles

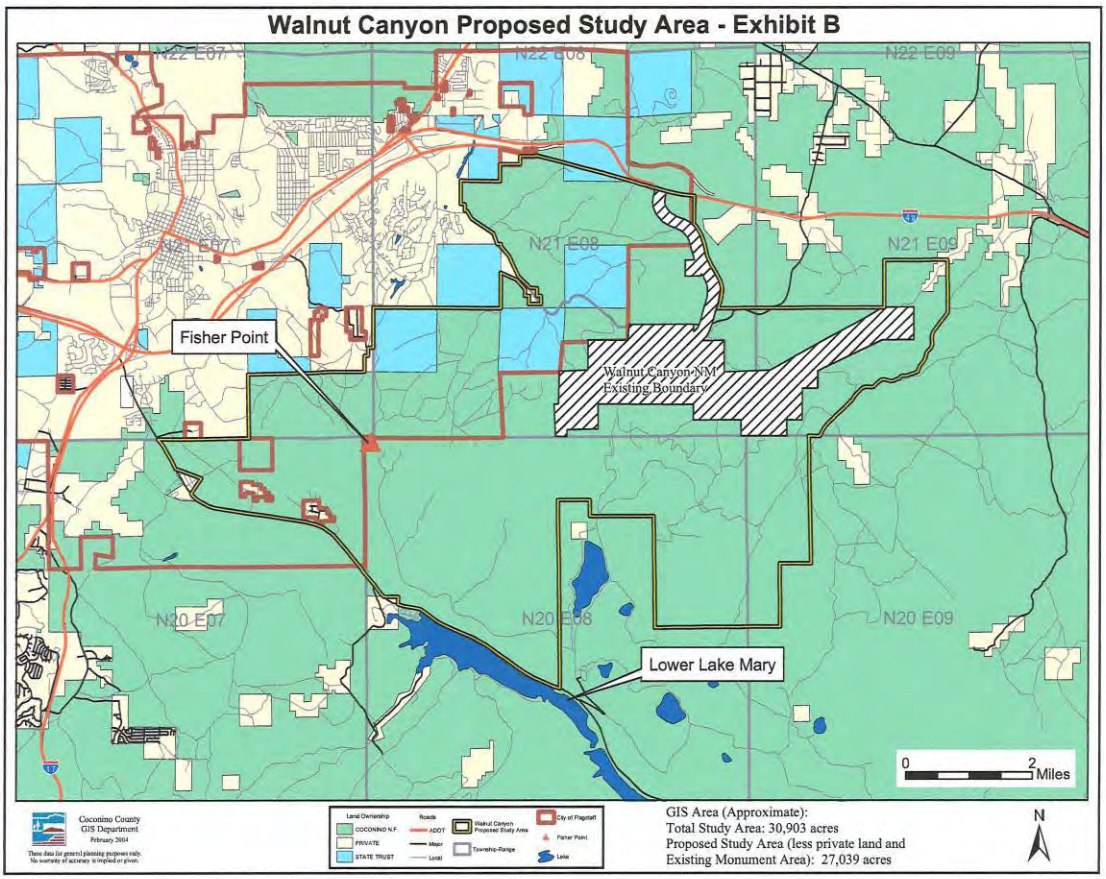
Walnut Canyon Proposed Study Area - Exhibit B
N22 E07
N22 E08
N22 E09
N21 E07
N21 E08
N21 E09
N20 E07
N20 E08
N20 E09
Fisher Point
Walnut Canyon NM
Existing Boundary
Lower Lake Mary
0
2
Miles
Coconino County
GIS Department
February 2004
Land Ownership
COCONINO N.F.
PRIVATE
STATE TRUST
Roads
ADOT
Major
Local
Walnut Canyon
Proposed Study Area
Township-Range
City of Flagstaff
Fisher Point
Lake
GIS Area (Approximate):
Total Study Area: 30,903 acres
Proposed Study Area (less private land and
Existing Monument Area): 27,039 acres
N

Exhibit "C"

List of Public Values

a. Geologic features
b. Historic sites
c. Potential urban development
d. Prehistoric sites
e. Riparian community
f. Scenery
g. Scientific education
h. Solitude/Serenity
i. Vegetation diversity
j. Watershed health
k. Wildfire hazard reduction/Healthy Forest
l. Wildlife
m. Wildlife habitat
n. Fee Free Access
o. Recreational Uses

Exhibit "D"

List of Current Public Uses

a. Access to forested areas
b. Bird watching
c. Camping
d. Driving for pleasure on roads/trails
e. Firewood gathering
f. General exercise
g. Group uses
h. Hiking
i. Horseback riding
j. Hunting
k. Livestock grazing
l. Mountain biking
m. Painting
n. Rock climbing
o. Sightseeing
p. Skiing
q. Snowmobiling
r. Target practice as permitted
s. Walking with pets
t. Wildlife viewing

Report to City-County joint meeting 23 September '02

Since the direction to staff was to obtain the public's desire related to the expansion/protection of the Canyon and the proposal submitted by the Friends of Walnut Canyon, no recommendation is made. However, there are several options that the Board and Council may wish to consider. These are as follows.

Options:

1. Designation of Walnut Canyon National Monument and Surrounding Lands as a National Park: Submit a resolution to the Arizona Congressional delegation in support of the re-designation of Walnut Canyon National Monument to a national park and/or preserve, with accompanying legislation, as requested by Friends of Walnut Canyon.

2. Pursue Suitability and Feasibility Analysis: Request US Congressional action to undertake an evaluation of resources at Walnut Canyon for their suitability and feasibility for inclusion in the National Park system.

3. Acquire State Trust Lands for Open Space Purposes: Request support of the Arizona Congressional delegation for Land and Water Conservation Fund appropriations for the acquisition of state sections 22 and 28.

4. Pursue Forest Service Perpetual Management: Request that the Coconino National Forest pursue the feasibility of providing a more permanent assurance that the lands in question between the current Walnut Canyon National Monument and the City's Urban Growth Boundary will be held in perpetuity and managed for multiple-use purposes by the Forest Service and in accordance with Forest Service polices. The Forest Service's pursuit should include, at a minimum, the feasibility of a US Congressional action designating the lands as a National Conservation Area or other designation or action that assures perpetual management, control and/or ownership by the US government, and does not allow the disposition of the land except by authorization of Congress.

5. Expand the Monument, but retain Monument status.

6. Retain Monument as is and designate the surrounding lands as a National Recreation Area or Preserve.

7. Expand on Multi-governmental Partnership: Support the FLEA process and its amendments to the Forest Plan including the designation of a Walnut Canyon Management Area and standard that states: "National Forest jurisdictions will be maintained for all lands in the Walnut Canyon Management Area. No land exchanges will occur unless the purpose is to acquire land within this Management Area through exchange of national forest lands elsewhere." "Cooperate with other agencies and local governments to maintain the State Trust Lands in wildland/open space status. Pursue purchase or land exchange options for the purpose of conservation."

8. To implement Regional Plan language as noted above:
   - Pursue and enter into an Intergovernmental Agreement with the various land managers to identify and confirm the issues and commit to addressing them in order to protect the natural and cultural resources in the urban interface area.
   - Support Forest Service efforts to manage the urban interface to mitigate future potential external threats to Monument resources through its FLEA process and amendment to the Forest Plan. The lands are being considered for recreation use with restricted motorized use.
   - Designate and require access points from developed or to be developed areas onto public lands.
   - Provide a transition zone of open space or low density from higher density development where adjacent to public lands.
   - Support the National Park Service in its efforts to monitor the use of and impacts on the natural and cultural resources.
   - Pursue Arizona Preserve Initiative re-designation of state trust lands as suitable for conservation.

9. Or any combination of the above. The overriding concern is the protection of the resources of monument and surrounding area in perpetuity. Any option that accomplishes that goal could be pursued.

Thank you, staff from each agency is here tonight to answer any questions.

HDR/e^{2}M
ATTN: Walnut Canyon Study Area Special Study
9563 South Kingston Court, Suite 200
Englewood, CO 80112

Dear Study Team,

In a letter dated 27 April 2010, I wrote to you about my proposal for a National Conservation Area, designated by Congress and administered by the Forest Service. Accompanying the letter were several documents, one of them being the proposal per se.

Now I write to augment that packet of information with three additional documents.

1. The document entitled *About a National Conservation Area in the Walnut Canyon Study Area* explains why the Study Area would qualify as an NCA and why the USDA Forest Service may administer an NCA.

2. The copy of a back-and-forth email with subject line *Two questions about National Conservation Areas* substantiates portions of the preceding document. As Chief of the BLM's Division of the National Landscape Conservation System, Mr. Jarvis provides compelling evidence for my statement that the Forest Service may administer a National Conservation Area—if Congress chooses to designate an NCA in the Study Area.

I believe that Mike Elson, District Ranger in the Flagstaff area, forwarded to you a copy of the email, but I send you a copy now as a fail-safe.

3. I enclose also an updated copy of my proposal for a National Conservation Area. On page 4, I describe how the proposal meets the two goals set by the City-County joint resolution of December 2002 and also the goals set Congress. On page 5, I point out two benefits to the National Park Service. The first three pages—the proposal *per se*—are essentially the same as before, but the format now presents separate items more clearly.

This updated proposal would be the better version to distribute in your workshops for agencies and local governments.

The three documents may help you when you prepare a set of "conceptual management options." As your mail will have shown, the proposal for a National Conservation Area has received substantial support from other individuals and from groups. An NCA certainly deserves a place in your spectrum of options.

Sincerely,

14 May 2010

About a National Conservation Area in the Walnut Canyon Study Area

Goals of National Conservation Areas

"National Conservation Areas (NCAs) are designated by Congress to conserve, protect, enhance, and manage public land areas for the benefit and enjoyment of present and future generations. NCAs feature exceptional natural, recreational, cultural, wildlife, aquatic, archeological, paleontological, historical, educational, and/or scientific resources." This descriptive quotation is from the website of the Bureau of Land Management, which administers a dozen or more National Conservation Areas. Three of those NCAs are in Arizona: Gila Box Riparian, Las Cienegas, and San Pedro Riparian. Any federal land management agency may administer a National Conservation Area.

How does the Walnut Canyon Study Area qualify as an NCA?

That is, what are the "exceptional resources"?

Natural resources. Walnut Canyon *per se* is an exceptional geologic feature. The canyon provides striking views from the top and especially from the bottom. The transition from the "fossil sand dunes" of the Coconino sandstone to the chalky layers of the Kaibab limestone stands out vividly. Moreover, the canyon provides exceptional habitat for peregrine falcons and spotted owls.

On some tracts in the Study Area, large ponderosa pines stand—widely separated—on a grassy understory. Those tracts resemble the old growth forest of the 1800s and provide an encouraging sense of what the forest all around Flagstaff may look like again.

Finally, the Study Area protects the watershed of Walnut Creek (downstream of Lower Lake Mary). According to the National Park Service, such protection commands a high priority for the long-term environmental health of Walnut Canyon National Monument.

Recreational resources. The Study Area provides national forest adjacent to Flagstaff's Urban Growth Boundary. The Campbell Mesa trail system has become highly popular (since its creation in 2002). Both the Arizona Trail and the Flagstaff Loop Trail pass through the Study Area.

Wildlife resources. As mentioned above, the canyon provides exceptional habitat for peregrine falcons and spotted owls. Goshawks and mountain lions live in the Study Area. Flagstaff

Pennyroyal (*Hedeoma diffusum*), a relatively rare endemic plant, thrives at numerous sites in the Study Area.

Archeological resources. The number and quality of archeological sites on the Forest Service land is typical of many areas on the Coconino National Forest. Thus, those sites are *not* exceptional. But the Forest Service land provides a protective buffer for Walnut Canyon National Monument, whose archeological resources are exceptional and of national significance.

May the Forest Service administer a National Conservation Area?

Yes. Here is a list of positive evidence.

1. The Forest Service itself suggested an NCA in September 2002 (with itself as administrator).
2. In an absolutely fundamental sense, Congress sets the boundaries of special federal areas, chooses their names, and selects their administrators. Congress has the authority to establish an NCA in the Study Area and to assign administration to the Forest Service.
3. Note that, currently, the Forest Service manages many areas that are *not* merely general National Forest. The Forest Service administers six National Monuments and more than 20 National Recreation Areas. It also administers "Special Management Areas" and "National Protection Areas."
4. Historically, the Forest Service managed Walnut Canyon National Monument for the first 18 years of the Monument's existence. Sure, the Forest Service may manage areas other than National Forests.
5. Congress has assigned management of National Monuments to five different federal agencies: the Forest Service, BLM, Fish & Wildlife Service, NOAA, and the National Park Service. It has assigned management of National Recreation Areas to three federal agencies: Forest Service, BLM, and NPS. There would be nothing surprising about Congress's assigning management of an NCA to the Forest Service (as well as assigning management of NCAs to the BLM).
6. I wrote to the Chief of the BLM's National Landscape Conservation System, which includes the BLM's NCAs, and posed the question, "Is there any inherent reason why Congress could not designate some portion of an existing National Forest as a National Conservation Area and assign management to the USDA Forest Service?" The Chief wrote back, "I am not aware of any prohibitions that would restrict Congress from designating a portion of a National Forest as an NCA and directing that management of the NCA remain under the Forest Service."

Re: Two questions about National Conservation Areas

1. There is no specific organic act for NCAs, no law similar to The Wilderness Act or the Wild and Scenic Rivers Act for NCAs. Therefore, there is no specific definition of NCAs that applies to all areas. You could say as a practical matter, NCAs are defined by those specific acts that designate them and by those specific areas that are designated by Congress as NCAs.

2. I am not aware of any prohibitions that would restrict Congress from designating a portion of a National Forest as an NCA and directing that management of the NCA remain under the Forest Service. The US Forest Service may have more information on this topic.

Dear Mr. Jarvis,

I write with two questions about National Conservation Areas

1. Definition. I am familiar with the description of a National Conservation Area that has often appeared on the NLCS website:

"National Conservation Areas (NCAs) are designated by Congress to conserve, protect, enhance, and manage public land areas for the benefit and enjoyment of present and future generations. NCAs feature exceptional

natural, recreational, cultural, wildlife, aquatic, archeological, paleontological, historical, educational, and/or scientific resources."

Is there any other, perhaps more formal definition of an NCA? If yes, what is that other definition?

2. Availability of the term. Congress has assigned management of National Monuments to at least five different federal agencies: BLM, Forest Service, NPS, Fish & Wildlife Service, and NOAA. Thus, various agencies share the designation "National Monument."

Is there any inherent reason why Congress could not designate some portion of an existing National Forest as a National Conservation Area and assign management to the USDA Forest Service?

7 June 2010

Proposal for a National Conservation Area in the Walnut Canyon Study Area

Goals of National Conservation Areas

"National Conservation Areas (NCAs) are designated by Congress to conserve, protect, enhance, and manage public land areas for the benefit and enjoyment of present and future generations. NCAs feature exceptional natural, recreational, cultural, wildlife, aquatic, archeological, paleontological, historical, educational, and/or scientific resources." This descriptive quotation is from the website of the Bureau of Land Management, which administers a dozen or more National Conservation Areas. Three of those NCAs are in Arizona: Gila Box Riparian, Las Cienegas, and San Pedro Riparian. Any federal land management agency may administer a National Conservation Area.

Proposal (in broad outline)

The Walnut Canyon Study Area, exclusive of the existing Walnut Canyon National Monument (WCNM), will become a National Conservation Area, designated congressionally and administered by the Forest Service.

Noteworthy features and exceptions, which will be embodied in the legislation, are as follows.

Land

1. ***WCNM entrance road.*** A jurisdictional issue will be settled definitively: the National Park Service will receive explicit and full administrative jurisdiction over the two 500'-wide strips of land along WCNM's paved entrance road, an area whose status has been the subject of debate.

2. ***State Trust land.*** The Forest Service will be authorized to acquire State Trust land by donation or purchase. In accordance with congressional precedent, the State of Arizona will retain all existing rights to its lands within the Study Area. Purchase of State Trust land may proceed only if the State is a "willing seller" and is paid fair market value.

3. ***Private land.*** Owners of private land in the two county islands near Lake Mary Road will retain all of their existing rights.

4. ***Private land again.*** The inholders of the "Santa Fe dam" private property will retain all of their existing rights.

5. ***Superfluous land.*** The private land in the extreme northeastern corner of the Study Area will be excluded from the NCA.

6. ***Protection against development.*** "Congressional designation" of the NCA implies, of course, that all federal land within the NCA is protected from exchange or development. Only an additional act of Congress can change that status. Thus the federal land will enjoy the *same* high level of protection that Congress gives to national parks.

Uses

1. ***Hunting***. The Arizona Game and Fish Department will retain management responsibilities where they currently exist. Thus, subject to prudent management decisions, hunting will continue where it currently exists.

2. ***Grazing.*** Grazing will continue to be permitted where it is currently permitted (subject to prudent management decisions).

3. ***Hiking, mountain biking, and horseback riding*** will continue as currently permitted (subject to prudent management decisions). [Implicit here is that the Flagstaff Loop Trail will be completed as currently planned and that appropriate connections will be constructed.]

Other uses will be addressed in the management plan.

Management Plan

Within two years of the establishment of an NCA, the Forest Service will develop a comprehensive management plan for the long-term management of the public lands within the NCA. Consultation with the NPS will be at the forefront. The Forest Service will consult also with state, county, and city agencies and commissions, with Native American tribes, with the public at large, and with current permittees. Integral to the process will be the formation of an advisory committee. The committee will consist of representatives from the constituencies that currently use, own, manage, or venerate the land within the Study Area.

Among the items addressed by the management plan will be motorized access and potential special protection for the western inner canyon (the canyon segment below the rim from the western boundary of WCNM to the meadow below Fisher Point).

More information about NCAs

As noted earlier, Arizona currently has three National Conservation Areas. The most recent addition is Las Cienegas NCA, located south of Tucson and established in the year 2000. A copy of the legislation that established Las Cienegas NCA can be found on the NCA's home page. The easiest route is this: type "Las Cienegas NCA" into Google and then select a site that starts with "www.blm.gov." Finally, click on "Public Law 106-538" in the right-hand sidebar.

A *Fact Sheet* for Las Cienegas NCA said "Activities that were permitted on BLM lands before the designation of the NCA are still permitted except for the filing of new mining claims and mineral leasing." In practice, you can think of a National Conservation Area as a multiple-use area (in the sense that the Forest Service uses the phrase) that Congress has protected against land exchange and hence against development.

In September 2002, at a joint meeting of the Flagstaff City Council and the Coconino County Board of Supervisors, Jerry Flannery, Deputy County Manager, presented a staff report on options for addressing the future of the Walnut Canyon Study Area. Among the options was pursuit of a National Conservation Area administered by the Forest Service.

Perspective

An article by Anne Minard in the *Arizona Daily Sun,* 13 February 2002, had the following to say about remarks by Sam Henderson, who at that time was Superintendent of the Flagstaff Area National Monuments.

> The area doesn't have to become a park, Henderson says, to be managed effectively for the resource values at hand. "There are endless opportunities for compromises," he said. "There are alternatives that require no expansion at all."

In a spirit of seeking middle ground, I propose a National Conservation Area, designated by Congress and administered by the Forest Service.

Proposed by

The merits of the proposal are explained on the following two pages.

Merits of the Proposal

A. The community's goals

The City-County joint resolution of December 2002 captured the community's goals very well. I think it fair to summarize the two goals as follows.

(i) ***In perpetuity goal.*** Protect the land and resources of the Walnut Canyon Study Area in perpetuity (with development being the major threat).

(ii) ***Current Uses Goal.*** Maintain current public access and uses.

How well does my proposal meet those goals?

Regarding the in-perpetuity goal, Congress would designate the boundaries of the National Conservation Area and would "withdraw" the federal land from disposal under the public land laws. No federal land could be exchanged or developed without subsequent Congressional legislation. Thus the federal land in the NCA would enjoy the *same* high level of protection that Congress gives to national parks. [Congress uses a standard language to protect federal lands from exchange or sale. For example, the very same words were used to protect Black Canyon of the Gunnison National Park and Gunnison Gorge National Conservation Area. The bill was S. 323 of the 106th Congress.] In short, protection of the (federal) land and resources would be in perpetuity (in so far as such a goal is attainable).

Regarding the current uses goal, an NCA under Forest Service administration would retain the current managing agency and hence would maintain current public access and uses in a natural and automatic fashion.

Several current uses—hunting, grazing, mountain biking, hiking, and horseback riding—are reaffirmed explicitly in my proposal.

Initially, motor vehicle access would be governed by the Forest Service's policies under the Travel Management Rule, policies that are expected to be adopted officially in 2010. According to my proposal, however, those policies would be reviewed and—perhaps—be judiciously amended when the NCA's management plan is written (during the first two years of the NCA's existence). An advisory committee consisting of representatives from the constituencies that currently use, own, manage, or venerate the land within the Study Area will participate in writing the management plan.

Thus, all in all, my proposal would meet both community goals very well.

For all practical purposes, the Study bill signed by President Obama in 2009, which is the document that governs the Study, set the same goals. Thus my proposal would meet the goals set by Congress, also.

B. Other merits

My NCA proposal provides at least two significant benefits to the National Park Service, as follow.

(i) The proposal would meet the goals for protection that the NPS articulated in its internal document, *Walnut Canyon National Monument. Proposed Boundary Expansion: Areas Required for Long-term Protection of the Walnut Canyon "Environment,"* dated November 2001.

(ii) The proposal resolves, in favor of the NPS, the dispute over which agency has full administrative jurisdiction over the two 500'-wide strips of land along WCNM's paved entrance road.

Walnut Canyon Study Area
Comments on Special Study

To: Study Team, Walnut Canyon Study Area

Re: Special Study

I support increased and permanent protection and interpretation of the natural, cultural, and recreational values of the Walnut Canyon Study Area. Enhanced protection of the Study Area would ensure the geological, biological, and anthropological integrity of the Walnut Canyon watershed and enrich its role as an outdoor classroom of natural and human history.

National Significance

• The Walnut Canyon Study Area is **a prime example of the Southwestern Ponderosa Pine Forest** and its many variations and microhabitats.

This major western forest type has not yet been singled out for interpretation anywhere in the National Park System despite its prominent place in the landscape, its role in western history, and the pressing need for better public understanding and appreciation of its fire-dependent ecology.

The Walnut Canyon Study Area also illuminates the key role of topography in biodiversity, a role that is not popularly understood or appreciated.

• The Walnut Canyon Study Area has exceptional geological, biological, and anthropological resources for **interpretation of the overlap of topography, biology, and human presence**.

The area's landforms vividly illustrate fundamental principles of **geology** including deposition, erosion, and plate tectonics. Erosion of interbedded limestone, siltstone, and sandstone etches picturesque canyons, ledges, slopes, and niches throughout the study area. Displacement along the Anderson Mesa Fault results in spectacular cliffs of crossbedded Coconino Sandstone.

Although it is within the Coconino sub-plateau of the vast Colorado Plateau, the Lake Mary Fault Zone is an example of Basin-and-Range extensional faulting. It is the most prominent expression of extensional faulting on the Coconino Plateau. The study area is one of the two most seismically active locations in Arizona; the Lake Mary Fault is potentially the most hazardous regional geologic feature.

The stretch of Walnut Creek in the current Walnut Canyon National Monument is **part of a drainage system that developed on the Mogollon Slope** well before the

Grand Canyon.[1] Between 4.4 and 3.9 million years ago, the Anderson Mesa Fault in the Lake Mary Fault system broke across this drainage configuration west of what is now the national monument. The original headwaters of Walnut Creek — Fay and Skunk canyons — were cut off, and the headwaters of modern Walnut Creek formed along the scarp of the Lake Mary Fault Zone. About .9 million years ago, another flow of lava interrupted the carving of Walnut Canyon. The great deepening of Walnut Canyon resumed only within the last few hundred thousand years.

Walnut Creek is a tributary of the Grand Canyon, where downcutting also occurred very quickly. The reasons for such rapid, **region-wide canyon carving** are not well understood but may have involved "sapping" of the limestone in an earlier climate regime.[2] The intriguing geologic features of the Walnut Canyon Study Area could well hold answers to this persistent question.

The Coconino Sandstone underlying the Kaibab Limestone and Toroweap formation is the **primary aquifer** in a region with very limited water supply. This aquifer, the many smaller perched aquifers, and ephemeral streams within the 170-square mile **Walnut Canyon Watershed** warrant permanent protection from urban development to prevent degradation of local water quality as well as riparian species of flora and fauna, which are already under great pressure in Arizona due to development.

The area is also a living **biological textbook** that reveals how differences in soil type and exposure to the sun create different communities of plants and animals. Its network of tributary canyons and steep slopes sustain a welter of habitats including riparian, which is now all too rare in the Southwest. North-facing slopes harbor Douglas fir and other shade and moisture-loving, mostly northerly species of plants and birds such as the hermit thrush. South facing slopes foster desert communities of plants and animals including Parry agave, banana yucca, and several species of cactus. Other variations in aspect toward the sun create innumerable microhabitats as well as rich and varied ecotones. As multiple tributaries wind their way from higher terrain toward Walnut Canyon, they provide continuity of habitat over many miles and serve as movement corridors for a range of insects, birds, mammals, and other animals, enabling both seasonal migration and healthy genetic flow. **Enhanced protection would prevent fragmentation of these critical and fragile habitats.**

Humans have depended upon the resources of the study area for at least 4,000 years. Its food plants and game animals sustained millennia of seasonal hunter-gatherers and supplemented the diets of early agriculturalists for centuries. Many plants of current ethnobotanical significance thrive here. The story of modern settlement is found in vestiges of logging railroads, livestock fences, and water tanks.

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[1] Holm, Richard F. *Pliocene-Pleistocene Incision on the Mogollon Slope, Northern Arizona: Response to the Developing Grand Canyon.*
[2] Wayne Ranney, personal communication.

Walnut Canyon Study Area
Comments on Special Study

• The study area is dear to local residents as well as visitors for **the restorative and recreational activities** it provides from contemplation, birdwatching, and flower quests to hiking, cycling, rock-climbing, camping, and fishing. It is a source of physical, emotional, and spiritual renewal for countless thousands every year, offering natural quiet, dark skies, inspiring vistas, intimate canyons, and four very dramatic scenic seasons. Readily accessible from both north and south, it is served by a network of trails including parts of the Flagstaff Urban Trail System as well as an especially lovely section of the Arizona Trail. Several community groups organize and volunteer for projects within the area including the Flagstaff Bicycling Organization, exemplifying the positive stewardship of a nationally significant area by private citizens.

The Walnut Canyon Study Area is a delightful **outdoor classroom** for children and adults interested in the natural sciences and in the resources people have depended upon throughout the region's human story. **Scientists have conducted many studies** here through agencies including the USFS Rocky Mountain Research Station, US Geological Survey, and Arizona Game and Fish Department. Professors and students from Northern Arizona University and its Ecological Restoration Institute carry out studies here as do researchers from the Museum of Northern Arizona and conservation groups such as the northern Arizona Audubon Society. One of my personal favorites was a study of pygmy nuthatches in Fay Canyon, where the researcher discovered more than 160 of these little birds roosting together in a tree cavity to conserve body heat. Important experiments in forest management have been and continue to be undertaken here that gauge the effectiveness of different management strategies. The study area encloses a number of closely monitored thinning and prescribed burning projects.

• The study area maintains a **high degree of integrity** as may be seen in its designation as "critical habitat" for the Mexican spotted owl, its six northern goshawk fledgling areas, and the presence of golden eagles and peregrine falcons. The area's wildlife includes habitat-sensitive mammals including black bears, mountain lions, American pronghorns, mule deer, gray fox, bobcats, and weasels. Sensitive species of plants found within the study area include the Arizona leatherflower *Clematis hirsutissima var. arizonica*, Flagstaff pennyroyal *Hedeoma diffusa*, and the desert columbine *Aquilegia desertorum*. Protecting the study area would maintain the connectivity and integrity of the flora and fauna of the Walnut Canyon Watershed.

Resource Evaluation

• The Walnut Canyon Study Area is an excellent example of **a biotic area: the Southwestern Ponderosa Pine forest ecosystem** and its varied expressions as determined by soils and topography. There are many places where the ponderosas mingle with trees adapted to narrower conditions of exposure or to higher or lower elevations: Douglas fir, aspen, New Mexico locust, Gambel oak, Rocky Mountain juniper, alligator juniper, and pinyon pine — and with their corresponding understories.

Walnut Canyon Study Area
Comments on Special Study

• Because of its rumpled topography, the study area has numerous **remnant stands of old-growth forest** in its classic form: clumps of mature, large-diameter ponderosa pines with plated red bark towering over fescue and wildflower understories. These clumps offer ideal habitat to tassel-eared Abert squirrels in a complex mutualism. Such old-growth stands are extremely rare in heavily logged northern Arizona.

• Ribbons of **regionally rare riparian vegetation** form a dendritic pattern across the study area. Parts of Fay Canyon and Skunk Canyon Narrows sustain such moisture-dependent species as canyon grape, redosier dogwood, snowberry, Arizona valerian, Arizona honeysuckle, Canada violet, Scouler's catchfly, roughfruited fairybells, aspen, mosses, and ferns. Sandy's Canyon provides habitat for these too as well as for sedges, Arizona virginia creeper, boxelder, narrowleaf cottonwood, and Thurber's potentilla. Natural ephemeral ponds and stock tanks dotted across the study area support riparian vegetation and migrating waterfowl. These areas are alive with the calling of many birds, especially in spring and fall.

• The study area is an **intact mosaic of habitat types sustaining diverse plant and wildlife species**. Many of the wildlife species require multiple habitats in the course of a day or as the seasons change for foraging, breeding, nesting, and protection. The study area expands Walnut Canyon National Monument into by far the most intact mixture of contiguous habitats in the greater Rio de Flag Watershed, the rest having been fragmented by development, the intersection of two interstates, and major arterial roads leading north to the Grand Canyon and Lake Powell.

• At the latitude of the study area, for every degree of tilt toward the south it is **as though the land has been moved forty miles toward the equator**. There are bands of desert vegetation on sunny slopes that include species whose center of distribution lies to the south such as Parry agave and Huachuca Mountain morning-glory. Special places such as these are becoming increasingly rare as sunny slopes are developed.

• The Walnut Canyon Study Area lies in the elevational gradient where ponderosa forest shifts into pinyon-juniper forest. Here, some of the species characteristic of the **Great Basin, the Sonoran, and the Great Plains ecosystems overlap**. A map with layers indicating the overall distribution of these species would radiate out from the study area like a sunflower. In combination with its rugged topography, this nexus makes the study area rich with a diversity of flora and their attendant pollinators from beetles to bees to butterflies to birds and bats.

• The study area is **critical habitat** for the Mexican spotted owl, has six northern goshawk fledgling areas, and golden eagles and peregrine falcons. **Sensitive species** of plants within the study area — especially in its western half — include the Arizona leatherflower *Clematis hirsutissima var. arizonica*, Flagstaff pennyroyal *Hedeoma diffusa*, and the desert columbine *Aquilegia desertorum*. The study area has vital corridors for the region's rapidly dwindling pronghorn, which are under pressure statewide from predators and from other animals that compete with them for forage.

Walnut Canyon Study Area
Comments on Special Study

• **The study area offers a feast of natural beauty,** from the sweeping vistas of Anderson Mesa to the dramatic cliffs of Fisher Point, and from the intimate, velvety-green hollows of Fay and Skunk canyons to the sundazzled grassy meadows at the point where the two converge. The music of calling birds, the butterscotch fragrance of the ponderosas, and the joy of exploring combine to create an experience of delight and enrichment.

View from the edge of Anderson Mesa toward the San Francisco Peaks.

Attachment: Species list of flowering plants in the area bounded by Fay and Skunk canyons, Walnut Canyon Study Area. Note: I have been photographing and recording the blooming of these species for several years. Their beauty and diversity as well as the variety of their pollinators are astonishing.

Family	Genus	Species	Habitat	Common Name
Agavaceae	Agave	parryi	s-facing slopes	Parry agave
	Yucca	baccata	s-facing slopes	banana yucca
Anacardiaceae	Rhus	trilobata	s-facing slopes	3-leaved sumac
	Toxicodendron	rydbergii	shade	poison ivy
Apiaceae	Pseudocymopteris	montanus	understory	alpine false springparsley
Asclepiadaceae	Asclepias	asperula	understory	antelope horn
	Asclepias	speciosa	moist/shady	showy milkweed
	Asclepias	suberticillata	understory	whorled milkweed
	Asclepias	tuberosa	sun	butterfly milkweed
Asteraceae	Achillea	millefoium	sun	yarrow
	Agoseris	aurantiaca	sun	orange mtn. dandelion
	Agoseris	glauca	sun	pale agoseris
	Amauriopsis	dissecta	sun	ragleaf bahia
	Anaphalis	margaritacea	sun	pearly everlasting
	Antennaria	parvifolia	understory	pussytoes
	Artemisia	tridentata	sun	big sagebrush
	Brickellia	grandiflora	shade	tasselflower brickellbush
	Calycoseris	parryi	understory	yellow tackstem
	Cirsium	arizonicum	understory	Arizona thistle
	Cirsium	neomexicanum	understory	New Mexico thistle
	Cirsium	wheeleri	understory	Wheeler's thistle
	Dieteria	canescens	understory	hoary tansyaster
	Erigeron	concinnus	understory/sun	Navajo fleabane
	Erigeron	divergens	sun	spreading fleavane
	Erigeron	formosissimus	sun	beautiful fleabane
	Erigeron	speciosus	sun	aspen fleabane
	Erigeron	sp.	understory	fleabane
	Grindelia	squarrosa	sun	gumweed
	Gutierrezia	sarothrae	sun	snakeweed
	Helianthella	quinquenervis	sun	fivenerve helianthella
	Heliomeris	multiflora	sun	showy goldeneye
	Heterotheca	villosa	sun	hairy goldenaster
	Hymenopappus	filifolius	sun	fineleaf humenopappus
	Hymenopappus	mexicanus	sun	Mexican woollywhite

Family	Genus	Species	Habitat	Common Name
	Hymenoxys	bigelovii	understory	Bigelow's rubberweed
	Hymenoxys	richardsonii	understory	Colorado rubberweed
	Packera	multilobata	sun	lobeleaf groundsel
	Packera	neomexicanus	sun	New mexico groundsel
	Pseudognaphalium	arizonicum	sun	Arizona rabbit tobacco
	Senecio	actinella	understory/sun	Flagstaff ragwort
	Senecio	spartioides	sun	broom groundsel
	Senecio	sp.	sun	groundsel
	Solidago	velutina	understory/sun	velvety goldenrod
	Stephanomeria	tenuifolia	understory/sun	narrow-leaf wirelettuce
	Townsendia	exscapa	understory	stemless townsendia
Berberidaceae	Berberis	repens	understory	creeping barberry
Boraginaceae	Cryptantha	setosissima	understory	bristly catseye
	Cryptantha	sp.	understory	catseye
	Lithospermum	incisum	understory	narrowleaf gromwell
	Lithospermum	multiflorum	understory	manyflowered gromwell
Brassicaceae	Draba	asprella	understory	Kaibab draba
	Nocceae	montana	understory	alpine pennycress
Cactaceae	Echinocereus	coccineus	s-facing slopes	claret-cup cactus
	Opuntia	macrorhiza	sun	twist-spine prickly pear
	Opuntia	phaecantha	sun	tulip prickly pear
Caprifoliaceae	Lonicera	arizonica	understory	Arizona honeysuckle
	Sambucus	sp.	understory	elderberry
	Symphoricarpos	oreophilus	understory	mountain snowberry
Carophyllaceae	Arenaria	lanuginosa	understory	spreading sandwort
	Silene	scouleri	shady slopes	Scouler's campion
	Silene	laciniata	understory	Mexican campion
Cleomaceae	Cleome	serrulata	sun	Rocky Mountain beeplant
Commelinaceae	Commelina	dianthifolia	understory	birdbill dayflower
Convolvulaceae	Ipomoea	plummerae	sun	Huachuca Mountain morning glory
Cornaceae	Cornus	sericea	understory	redosier dogwood
Euphorbiaceae	Chamaesyce	fendleri	sun	Fendler spurge
	Euphorbia	brachysera	sun	shorthorn spurge
	Euphorbia	chamaesula	understory	mountain spurge
	Euphorbia	incisa	understory	Mojave spurge

Family	Genus	Species	Habitat	Common Name
Fabaceae	Astragalus	castaneiformis	understory	chestnut milkvetch
	Astragalus	humistratus	understory	ground-cover milkvetch
	Astragalus	oophorus	understory	egg milkvetch
	Astragalus	tephrodes	understory	ashen milkvetch
	Calliandra	humilis	sun	dwarf stickpea
	Dalea	albiflora	understory/sun	white-flower prairie-clover
	Lotus	wrightii	understory/sun	Wright's deervetch
	Lupinus	argenteus	understory/sun	silvery lupine
	Lupinus	kingii	sun	King's lupine
	Oxytropis	lambertii	understory/sun	Lambert's locoweed
	Phaseolus	angustissimus	understory	slimleaf bean
	Vicia	americana	understory	American vetch
Fumariaceae	Corydalis	aurea	sun	golden corydalis
Gentianaceae	Frasera	speciosa	understory/sun	showy frasera
Geraniaceae	Geranium	caespitosum	understory/sun	pineywoods geranium
	Geranium	richardsonii	understory	Richardson't geranium
Grossulariaceae	Ribes	cereum	understory	wax currant
Hydrophyllaceae	Phacelia	heterophylla	understory	Kaweah River scorpionweed
Iridaceae	Iris	missouriensis	sun	western blue-flag
Lamiaceae	Agastache	pallidiflora	understory	giant hyssop
	Hedeoma	diffusa	sun-limestone	Flagstaff pennyroyal
	Hedeoma	oblongifolia	understory/sun	oblongleaf false pennyroyal
	Monarda	fistulosa	understory	wild bergamot
	Monardella	odoratissima	understory	pale mountainbalm
Liliaceae	Calochortus	nuttalli	understory/sun	sego lily
	Echeandia	flavescens	shade	Torrey's crag lily
	Maianthemum	stellatum	shady slopes	little false Solomon's seal
	Prosartes	trachycarpa	shady slopes	rough-fruited fairybells
	Zigadenus	elegans	shady slopes	mountain deathcamas
Linaceae	Linum	australe	sun	southern flax
	Linum	lewisii	sun	Lewis's flax
Malvaceae	Sphaeralcea	sp.	sun	globemallow
Monotropaceae	Pterospora	andromedea	shade	woodland pinedrops
Nyctaginaceae	Mirabilis	linearis	sun	narrowleaf four o'clock
Onagraceae	Calylophus	hartwegii	sun	Hartweg's sundrops

Family	Genus	Species	Habitat	Common Name
	Gaura	sp.	sun	beeblossom
	Oenothera	caespitosa	understory	tufted evening primrose
	Oenothera	coronipifolia	sun	crownleaf evening primrose
Oxalidaceae	Oxalis	sp.	shade	oxalis
Plantaginaceae	Plantago	argyraea		saltmeadow plantain
Polemoniaceae	Ipomopsis	aggregata ssp. Forr	understory/sun	scarlet gilia
Polygonaceae	Eriogonum	alatum	sun	winged wild buckwheat
	Eriogonum	racemosum	understory/sun	redroot buckwheat
	Eriogonum	umbellatum	sun	sulphur wild buckwheat
Ranunculaceae	Aquilegia	desertorum	limestone	desert columbine
	Clematis	hirsutissima var. ar	shady slopes	hairy clematis
	Clematis	ligusticifolia	partly shady slopes	western white clematis
	Thalictrum	fendleri	partly shady slopes	Fendler's meadow-rue
Rhamnaceae	Ceanothus	fendleri	understory/sun	Fendler's mountain lilac
Rosaceae	Amelanchier	sp.	understory	serviceberry
	Argentina	anserina	understory/sun	silverweed cinquefoil
	Fallugia	paradoxa	understory/sun	Apache plume
	Petrophytum	caespitosum	bare rock	rockmat
	Potentilla	sp.	understory	cinquefoil
	Purshia	stansburiana	sun	Stansbury's cliffrose
	Rosa	woodsii	understory/sun	Wood's rose
Rubiaceae	Galium	aparine	understory/sun	bedstraw
	Houstonia	rubra	understory/sun	houstonia
	Houstonia	wrightii	understory/sun	pygmy bluets
	Kelloggia	galioides	understory/sun	milk kelloggia
Saxifragaceae	Heuchera	parvifolia	shady slopes	alum root
	Lithphragma	tenellum	understory/sun	slender woodland star
Scrophulariaceae	Besseya	arizonica	understory	Arizona kittentails
	Castilleja	integra	sun	wholeleaf Indian paintbrush
	Cordylanthus	sp.	understory	birdbeak
	Orthocarpus	purpureo-albus	understory	purple-white owl clover
	Pedicularis	centranthera	understory	betony
	Penstemon	barbatus	understory/sun	beardlip penstemon
	Penstemon	linarioides	sun	blue penstemon
	Penstemon	virgatus	understory	upright blue beardtongue

Family	Genus	Species	Habitat	Common Name
Valerianaceae	Valeriana	arizonica	understory	Arizona valerian
Verbenaceae	Verbena	macdougalii	sun	New Mexico vervain
Violaceae	Viola	canadensis	shady slopes	Canada white violet
Vitaceae	Vitis	arizonica	shady slopes	canyon grape
Total			**143**	

Monday, May 17, 2010

Walnut Canyon Study Area Special Study
9563 South kingston Court Suite 200
Englewood CO 80112

My wife and I have resided on State Trust land lying in the study area since 2003. We are the only residents on section 28 and I believe the only ones on the 3+ sections of State Trust land in the Area.

We have been witness to extreme littering, the cutting of live trees for fun, creation of new "roads", illegal discharge of firearms, and illegal campfires. I believe drug activity may also be taking place.

As examples, I personally have had 2 trashed cars removed, 2 car engines, a TV set a sofa and uncountable beverage containers. I called a Flagstaff police officer who in turned called for backup before approaching a target shooter. In one extreme case a large RV was trashed and abandoned. In another case an oval track for motorcycles and ATV's was carved out of the woods.

Obviously this beautiful piece of land needs protection. The Land Department has been unresponsive to my concerns. I would hope that a national conservation area could be established to protect this Area from vandals and development.

Walnut Canyon Study Area Special Study July 22, 2010
9563 S. Kingston Court, Suite 200
Englewood, CO 80112

To whom it may concern:

We of the Coconino County Farm Bureau and Cattle Growers Association have considered the proposed expansion study of the Walnut Canyon National Monument. We are opposed to the proposed expansion of the national monument. There is nothing that is unique to the proposed study area that is not already included in the existing national monument.

The monument was expanded several years ago and the area that was included in the monument at that time has been pretty much closed to the general public for most multi-use activities.

The National Park Service is not structured to be able to manage multi-use activities, therefore, we feel the study area should remain in the management care of the United States Forest Service.

We would support the creation of a National Conservation Area managed by the U.S. Forest Service. A National Conservation Area could still be managed as multi-use lands and at the same time remove the study area from future development.

We would like to see the area retain all the multi-use activities that are now presently enjoyed there, including; hiking, biking, rock climbing, horseback riding, camping, hunting, fishing, wildlife viewing, as well as grazing and timbering.

Many of these activities would be curtailed or stopped by including the study area in the National Monument. This area is adjacent to the southern border of the city of Flagstaff, and many people from the city venture out into the woods there for recreation.

A National Conservation Area green belt is an ideal situation for the study area.

One of the grazing leases in the study area was retired by the Forest Service several years ago. There are however, three grazing leases on the eastern end of the proposed study area that are currently in use. Three families that hold these leases would surely be adversely affected by inclusion in the monument.

We are also concerned that the inclusion of the study area in the monument would adversely affect the air traffic patterns of the Flagstaff airport, Pulliam Field. The proposed study area is near the airport, and the landing and takeoff traffic will be flying over the study area.

We feel that limited timber cutting and thinning should also be allowed in the National Conservation Area. This could be for wildfire fuels reduction purposes. The proposed study area is just south of the city. The prevailing winds blow from the south west. If no timber cutting were allowed, this would create a dangerous situation for the city of Flagstaff during fire season.

We have just gone through a terrible fire season this year. We had three major project fires in and near the city, with disasterous results. We are still involved in the effects of those fires. Flooding and mud slides have resulted from the rainy season dropping much needed rain on the denuded slopes. The flood waters swept through homes and across roadways several miles from the area of the fires. The flooding claimed the life of a 12 year old girl just yesterday, when she was swept away in the flash flood waters.

In conclusion, we would support the creation of a National Conservation Area including the proposed Walnut Canyon Study Area, and would like to ask you to please recommend such an NCA in the conclusion of the study.
Thank you,
Jim Parks
First vice president,
Coconino County Farm Bureau and Cattle Growers Association

Friends of Walnut Canyon
P.O. Box 835
Flagstaff, AZ 86002-0835

April 26, 2010

For 20 years the Friends of Walnut Canyon have been advocating that the boundaries of Walnut Canyon National Monument need to be expanded. Why we think the Area is important and what is special about it is reiterated throughout this comment.

At a recent Public Meeting about the Special Resource Study someone asked the question, "How was the boundary of the Study Area created?" Interestingly enough, no one present from either agency knew the answer. This points out the fact that no one dealing with the questions regarding the future of the Walnut Canyon area knows anything about the recent past of the Walnut Canyon area.

The Friends would like this short history to be included in the information considered when decisions are made about Walnut Canyon. Included are several direct quotes from both US Forest Service officials and National Park Service documents which put us all in the position that we are today.

Why is the Special Resources Study being done in Walnut Canyon, and why are the boundaries where they are?

In April of 2001, the NPS released the Draft General Management Plan for Walnut Canyon National Monument which said"

During the course of the planning process, and as specified in Section 6004 of the National Parks and Recreation Act of 1978 (16 U.S.C. 1a-5et seq.), careful consideration was given to the expansion of boundaries at Walnut Canyon. Authority for modifying park boundaries is contained in the Land and Water Conservation Fund Act amendments of June 10, 1977 (Public Law 95-42). Consideration for modifications to the boundaries was based on one or more of the following criteria: (1) expansion would include significant resources or opportunities for public enjoyment, (2) expansion would address operational and management issues, or (3) expansion would protect monument resources critical to fulfilling the purpose of the park. Boundary expansions are considered practical or necessary if (1) the added lands could feasibly be administered, taking into consideration the size of the proposed expansion, configuration, ownership, costs, etc. and (2) that other alternatives for management and resource protection are not considered adequate.

A boundary expansion assessment determined that both natural and cultural resources that contribute to the purpose and significance of the monument still remain outside

current monument boundaries. However, further expansion of existing boundaries at Walnut Canyon was not recommended at this time….

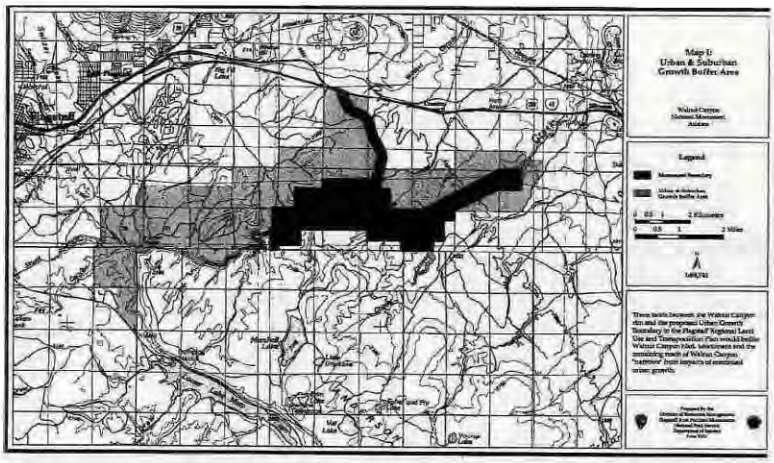
In presenting a discussion regarding the boundary expansions it is important to note that an effort is being undertaken by the National Parks and Conservation Association and the Friends of Walnut Canyon to seek a boundary expansion of the park through congressional action. Their goal is to complete the proposal that they presented in the late 1980s and early 1990s that was only partially addressed with the expansion in 1996. The boundary expansion proposed by these organizations would certainly insure the protection of significant resources that exist between the City of Flagstaff's Urban Growth Boundary and Walnut Canyon proper.

In 2002 the Friends proposed that an even larger area (than that mentioned above) around Walnut Canyon National Monument be made into Walnut Canyon Park and Preserve. The boundaries that we used were based on maps created by the National Park Service for Congressman J. D. Hayworth, who asked Sam Henderson, Park Superintendent for the Flagstaff Area Parks, to give to him what the National Park Service thought was the "ideal boundary" for Walnut Canyon.

In response to this request from the Congressman, the NPS created the following maps, saying that these areas need to be protected in order to "preserve the core values *within the existing monument!*" They suggested that the enlarged park be redesignated as a National Park.

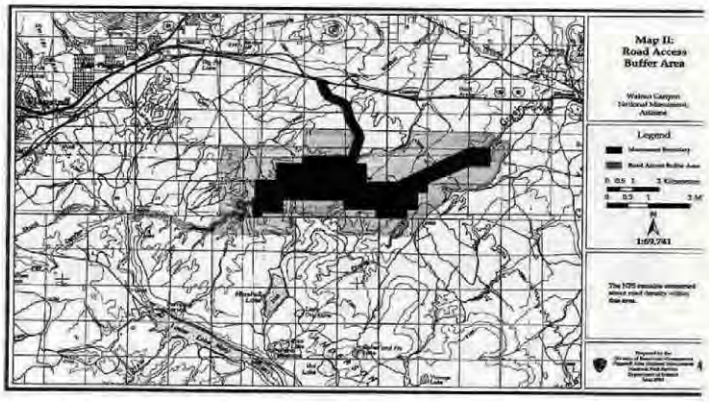
Each map shows the area needing permanent protection in order to either protect a particular value, or to protect the existing monument from the impacts of that threat.

Map I Urban and Suburban Growth Buffer Area

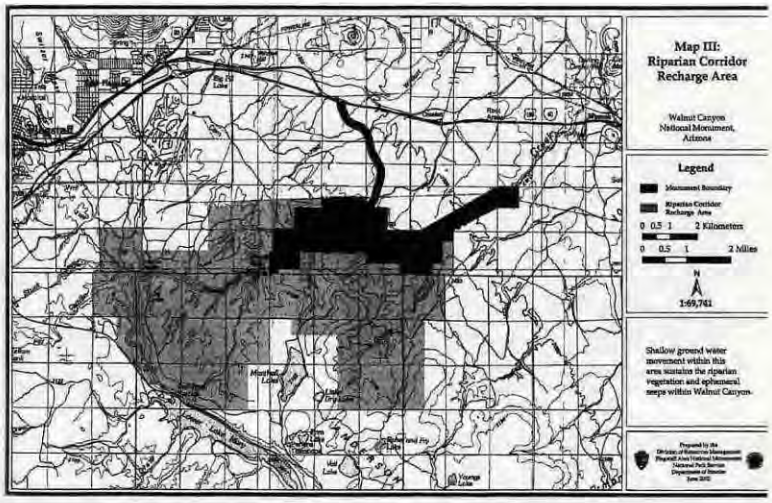


-2-

Map II Road Access Buffer Area

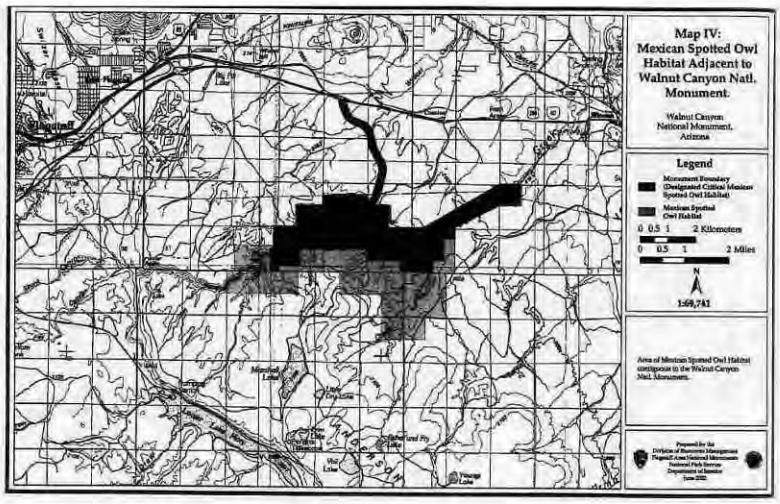


Map III Riparian Corridor Recharge Area

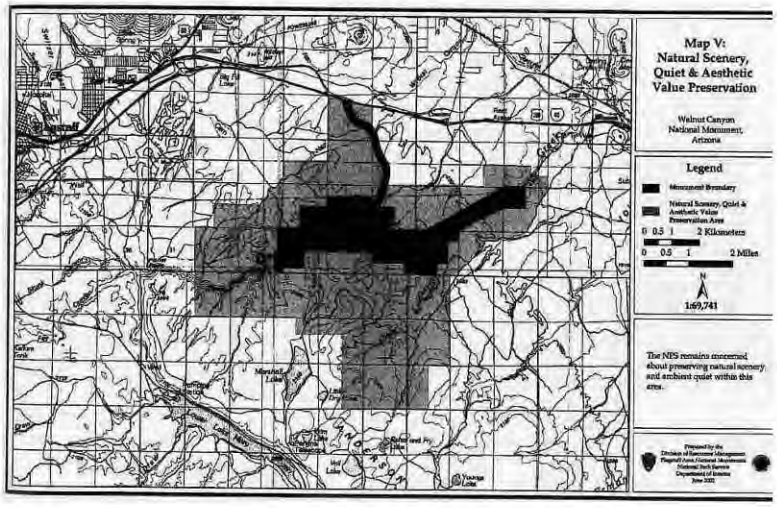


-3-

Map IV Mexican Spotted Owl Habitat Adjacent to Walnut Canyon National Monument



Map V Natural Scenery, Quiet and Aesthetic Value Preservation



-4-

The maps all pieced together formed the boundary for the Friends' proposal, and eventually, the majority of the area included in the Walnut Canyon Study Area. See the map of the Walnut Canyon Park and Preserve attached.

(Near the end of the lengthy 2002 Walnut Canyon public hearing process, the City and County chose to add acreage that was included in what the US Forest Service at that time called the "Walnut Management Area" but was *not included in the Friends' proposal* to the area to be studied.)

At the same time as the series of maps, the NPS created a document which explained why they felt that the boundary expansion was necessary.

In this document it says:

"In 1998, the NPS began preparing a new General Management Plan (GMP) for WCNM to guide management efforts during the next 10-15 years. Early in the planning process, NPS, public, and stakeholders were involved in scoping key resource values and management issues for consideration in the GMP. In addition to the "core canyon" archaeological resources for which WCNM was established – the Sinagua Culture cliff dwellings- several key natural resource and visitor experience values were identified which transcend the existing Monument boundary, including:

- **Preserving the long term integrity of the Walnut Canyon environment.**
- **Protecting the riparian corridor found at the canyon bottom along "Walnut Creek", including isolated water seeps found in the canyon.**
- **Preserving the extremely diverse canyon flora, and protecting populations of as many as five rare plant species**
- **Maintaining unfragmented habitat and movement corridors for wildlife, including elk, pronghorn, mountain lion, black bear, and wild turkey.**
- **Protecting the endangered Mexican Spotted Owl and designated critical habitat within the Monument: and preserving breeding habitat for the Peregrine Falcon and the Northern Goshawk**
- **Restoring ponderosa pine "parklands" above the canyon rim to presettlement conditions.**
- **Preventing the introduction and spread of non-native ("exotic") species.**
- **Preserving aesthetic values, including natural scenery, Natural quiet, and nighttme sky views."**

The entire document explains why the NPS felt that the current boundaries of the Monument were no longer sufficient because of outside pressures of both urban growth and the continual but gradual degradation of the surrounding land under US Forest Service Management.

The Friends of Walnut Canyon trust that if the NPS said that all of this area should be in the Monument, and that it should be a National Park and not a Monument, that it should be so. Their expertise and knowledge is clearly the ultimate in making this decision. It was, however, our idea to designate the lower portion of the proposed expansion area as National Preserve, to be managed by the NPS, but allowing cattle grazing, hunting, and other uses which would not be allowed in a National Park. Under the stricter supervision of the National Park Service instead of the USFS or the AZ Game and Fish Dept, we felt this would be less of an impact upon the public, while still maintaining a watchful eye to prevent the level of degradation of resources which is allowable under U.S. Forest Service control.

The Impact of the Regional Plan

Over the past 20 years the Friends of Walnut Canyon have watched development eat away at the area around Walnut Canyon. When we made the first expansion proposal, which is clearly insufficient now, all of the lands around the Study Area were zoned 1unit per 5 acres. This would mean an absolute maximum of 125 households in an entire 640 acre section. Along came the Regional Plan in which the first drafts argued for a MINIMUM of 7 units per acre. This changes the ante from 125 households to a minimum of 4, 480 households (generally figured to have 2.8 persons per household.) With great effort the City and County were convinced to lower density directly adjacent to what is now the Study Area. However when the first Planning Reserve Area with this sort of planning and density arrangement was actually planned to be built out in the Villagio subdivision, the City of Flagstaff reneged, saying that if the different density areas were being planned by the same developer that it was acceptable to "average densities." In that case this resulted in some of the highest densities being relocated into the areas the Plan designated the lowest.

This clearly indicates that we cannot rely upon the Regional Land Use and Transportation Plan to keep the impact of the urban interface low adjacent to the Study Area.

At this same time, the Forest Supervisor, Jim Golden, who was also appalled by the numbers being put forth by the Plan, and the lack of significant "buffer" in the plan, wrote a letter to the City of Flagstaff saying:

We accept that the urban interface is a fact of life, including some residential developments adjacent to the National Forest. However, when the National Forest lands are largely surrounded by developed private lands, these lands often becomes (sic) changed to the point that they lose their "wildland" character. At this point we believe it is generally more appropriate for some other public or private entity to manage these lands to achieve the goal of open space, and we would tend to support land exchanges to transfer ownership

I am concerned by the apparent assumption in this document that National Forest lands are the primary source of local open spaces for the long run. …. A casual reader of this document would probably assume that the Forest Service would continue to manage these lands as open space…. It is not the role of the Forest Service to manage community open space that takes on city of county park-like characteristics.

Although whenever the Friends seriously push for Monument Expansion the USFS has every single time maintained that they will "not exchange any of this land, it says so in the Forest Plan." This letter reveals what we have always known, that the Forest Supervisor can over ride the Forest Plan with the simple stroke of a pen. Continued management of any of the Study Area lands by the USFS *without a Congressionally authorized designation* could lead to land exchange. All it takes is a new Forest Supervisor with a different attitude. In the last twenty years we have experienced the many moods of roughly 5 different Forest Supervisors.

One Peaks District Ranger several years ago told a member of the Friends of Walnut Canyon in a private meeting that "we don't want any of the land north of Walnut Canyon."

Land in the NPS system, however cannot be exchanged or sold without Congressional consent.

It must be said though, that the Regional Land Use and Transportation Plan said that:

"It is proposed to protect natural and cultural resources around the Monument by simultaneously pursuing appropriate expansion of Walnut Canyon National Monument….."

It goes on to say that all sorts of partnership work with the Forest Service will also be done, but 10 years later it has not.

Regarding the State Sections

In 1997, Congressman J.D. Hayworth sent a letter to the State Land Dept urging them to preserve all three sections:

The State Trust land that is referred to in the letter to you from the Friends, discussed the importance of Sections 22, 28 and 30 of T21N R8E to the overall objectives of the residents of Flagstaff to protect the Walnut Canyon area. As the City of Flagstaff and surrounding area continue to grow and develop, the importance of preserving these sections from future development becomes increasingly important.

Should the opportunity occur for the State Trust Land Department (sic) to exchange these sections or transfer ownership by friendly condemnation for the purpose of protecting them from development, I would urge you to do so.

In the last 20 years the Friends have also watched the State Sections near Walnut Canyon diminish from 4 to 3, at least as far as availability for protection from development. When our first expansion proposal was being considered in 1990, the State Land Commissioner was asked by Congressman Stump's office to issue an order refusing to accept applications on those sections while the issue was undecided; he complied. Technically those orders still are in effect, but in reality they are considered too old to be of any use. Since then Section 20, the section furthest from the canyon was included inside the Stage 2 Urban Growth Boundary in the Regional Plan.

Although Section 28, which contains a huge side canyon of the main Walnut Canyon, and Section 22 which straddles Old Walnut Canyon road, were included over and over again in initiatives and referendums designed to protect Open Space, all of which failed at the ballot box for one reason or another, Section 30, closest to Fisher Point and the beckoning entrance to the fragile inner canyon has always been left out.

Although it was labeled "of the highest level of retention for Open Space" in the Open Spaces and Greenways Plan, and was left outside of the Urban Growth boundary in the Regional Plan, Section 30 has time and again been considered by one group and then another as somehow necessary to the City's future development. Even in the last year I have met with the City's Planning staff who asked me if it would be acceptable to the Friends if all of the development in Section 30 were tightly "clustered" in the north half of the section.

State Sections are costly to acquire, even when the State Land Dept wishes to preserve them. However the National Park Service has the ability to acquire State Land through friendly condemnation and "payment" with like land elsewhere in AZ. The US Forest Service does not. Three entire sections could be acquired for protection at absolutely no cost to the taxpayer, or the agencies.

RESOURCES

The Walnut Canyon Study Area contains unique and matchless resources when it comes to the interpretation of the lives of the Sinagua in Walnut Canyon. It is one thing to show the houses that the people lived in, but it is another to show the surrounding neighborhood which was their church, their school, their supermarket and their shopping mall. The Monument as it exists today was created when the ruins were a whole day's buggy ride from the nearest town and the white man's understanding of Native American culture was limited and patronizing. The current boundaries are simply insufficient in today's world.

If the enabling legislation were expanded the NPS could also protect the Walnut Canyon watershed, which controls the life and death of the canyon's ecosystem. It could interpret the early history of the white settlers in the region with their cabins sites, and names carved in the walls of the canyon. It could interpret the early logging years of Flagstaff through the remains left throughout the forest, and the unique stand of Old Growth Ponderosa pine left on the canyon rim just outside the current Monument boundaries. The Forest Service has had these resources for generations, but does not have the funds or the mission to interpret them for the public.

Historic Resources

In 1857 Edward Beale was reported to have visited Walnut Canyon while surveying routes from Fort Smith Arkansas to the Colorado River at the border of California. The exact route he chose in this area is likely now under either Interstate 40 or the Burlington Northern /Santa Fe Railroad which border the area to the north. Edward Beale himself was a fascinating character and the story of his expedition with its camels along with the emigrants, stock drives, and military expeditions which used this route starting in 1858 before it was even officially completed and through the 1870s would provide tremendous educational and interpretive material.

Native American Cultural Resources

Walnut Canyon includes springs and caves currently used for sacred purposes by the Hopi people, possibly other Native Americans. According to the Hopi, these sites have been in continual use by their people since the original inhabitants of the canyon.

There are innumerable other prehistoric sites, including caves that were lived in, others that were used for storage, others that were used for religious ceremonies. There are in-the-rock metates, pictographs and petroglyhs.

In the past the prehistoric sites in the Walnut Canyon area have been protected by their remoteness. With the huge expected increase in future residents to the land adjacent to the area under consideration, the destruction, degradation, and removal of these invaluable and finite resources will logically increase.

Wildlife Resources

The areas north and south of Walnut Canyon are critically important to wildlife movements in the vicinity of the canyon. A major southwest to northeast wildlife corridor runs through this area. Species using this corridor include elk, deer, antelope, bear, and mountain lion. Much of the area around the migration corridors is designated as "High Quality {wildlife} Habitat" in the 1998 Flagstaff Open Spaces and Greenways Plan, indicating that intact, undegraded habitat conditions are present. As well, wildlife likely rely on perennial water found in Cherry Canyon during times of drought. Residential development within the present urban growth boundary near the edge of Walnut Canyon would very likely disturb wildlife movement patterns in this area.

The Study Area is an important wildlife area for a large number of species including elk, pronghorn, antelope, mule deer, black bears, mountain lions, javelina, ringtail cats, and bobcats. Bird species include turkey, peregrine galcon, Mexican spotted owl, northern goshawk, golden eagle, and a variety of cavity nesting birds that find refuge in the old growth area on the rim and side canyons.

The Study Area contains federally threatened species, as well as state species of special concern. Walnut Canyon itself contains several active "protected activity centers" (PACs) for the Federally Threatened Mexican Spotted Owl, and is important foraging habitat for state and federally sensitive raptor species including bald eagles, peregrine falcons, and northern goshawks. Sensitive mammal species include red bat, spotted bat, and possibly Mexican vole.

Within the birding community, the red faced warbler is a highly prized sighting, especially for Easterners. The nesting habitat for this warbler is limited almost exclusively to locations in or near deep, heavily forested canyons and cool, steeply sloping drainages. Add to this that they are only found in this particular habitat from north-central Arizona to west-central New Mexico and south to Durango, Mexico, and the Red-faced warbler is a rare bird indeed, even though it has escaped recognition as any kind of listed species. Because it nests on the ground, the impact from human use (and their accompanying loose dogs) is substantial.

As late as the early 1990s the Red-faced warbler was frequently seen in Skunk Canyon, but the increased rate of recreational use has caused the warbler to abandon it as a nesting area in recent years. It is still found in Walnut Canyon itself, but its continued use of the area will depend on the level of visitation.

Geologic Resources

The rock contours of the inner gorge of Walnut Canyon reveal their origins in the wind scoured dunes of an ancient desert. No where else is this clear "petrified sand dune" appearance as apparent as the inner canyon at the Fisher Point

The Kaibab limestone ledges of the upper canyon contain delicate marine fossils, remnants of the later seas.

Rock outcrops some distance from the canyon have divulged large gastropods, bulkier residents of the Permian seas 200 million years ago.

The obvious transition from desert to sea in ancient times provides remarkable opportunities for interpretation.

Other unique resources

The viewscape from within and around Walnut Canyon is unique, notable, and exemplary. Not only the canyon itself, but also the views of the San Francisco Peaks from across the canyon are breathtaking.

The canyon bottom riparian areas and the spectacular shapes and colors of the canyon walls combine to create an appealing display which is not only unique, but which many people of many races find spiritually moving.

The Arizona black walnut trees in the bottom and old growth Ponderosa pine stands on the south rim are extremely uncommon on the Coconino NF. To have both in such close proximity is a rarity.

Walnut Canyon itself has a widely recognized array of diverse biological communities, each characterized by different temperatures and plant life. These plantlife zones are miniature versions of the zones spanning the western part of the Continent from Mexico to Canada – all within the canyon's 20 mile length and 400 foot depth.

Within Walnut Canyon, ecological communities overlap to form ecotones, bringing together species usually separated by elevation, and creating a rare compression of flora/fauna zones. The biodiversity supported by these habitats is thought to have contributed to the decision of prehistoric people to settle here.

Recreational Uses

The Walnut Study Area is popular for hiking and horseback riding, running and birdwatching, hunting and cross country skiing, bicycling and snow shoeing, not to mention the good old fashioned ride-in-the-woods looking for elk or deer. But none of these activities is as important as the preservation of the resources. Any one of them should be limited if it threatens to damage the NATURAL RESOURCES of the Study Area.

It has been suggested by some that the area be designated a National Recreation Area. That is absurd. The people of Flagstaff want to Protect Walnut Canyon, not destroy it.

This can be easily seen in the results of the telephone survey taken in 2002.

The 2002 telephone survey

Between August 6 and 8 2002, 434 Flagstaff region residents were polled by the Social Research Laboratory of NAU at the request of Coconino County.

The primary question was this

Do you strongly support, somewhat support, somewhat oppose, or strongly oppose expanding Walnut Canyon National Monument beyond the current size of 3,441 acres to include up to 20,000 acres of adjacent state and National Forest land?

***43%* strongly supported the proposal**
34% somewhat supported
5% somewhat opposed
9% strongly opposed
11% didn't know

Unless you want to argue that the 434 people polled were stupid, or don't know the difference between US Forest Service and National Park Service management, this Survey shows the opinion of the people of Flagstaff.

More information (much more information!):

The most comprehensive and well-written paper on the Potential Impacts of Increased Development in the Vicinity of Walnut Canyon National Monument was submitted to the City of Flagstaff in July of 2001. It was written by Steve Mitchelson, the former Natural Resource Specialist, and expounds what serious impacts would be expected to occur if lands within the Walnut Canyon watershed were developed into urban and suburban areas. I would like to include this paper in my comments in its entirety. I can't begin to write anything with such knowledge and authority.

Betsy McKellar

Projects Coordinator, Friends of Walnut Canyon

Many of the statements made in this comment statement are borrowed verbatim from National Park Service documents.

To All it May Concern: 7/8/10

In 1977 the Heath family purchased 30 of the 86 acres of private land that exists along Old Walnut Canyon Road immediately South and East of Section 20, a section of State land, and specifically a portion of Section 21. We have lived on a portion of this parcel since early 1978. A major consideration in our purchase of this land was the fact that it was well within the City Limits of Flagstaff.

I have some thoughts regarding the current Walnut Canyon Area Special Study:

1. I am opposed to putting any additional land under NPS control

2. I am opposed to any jurisdictional changes within Flagstaff City Limits

3. The study's declaration of current uses omits the fact that off-road vehicle use is rampant throughout the study area and is un-policed by current agencies. Any comprehensive control of off-road vehicle use will require significant investment of time and money or a total lockdown of the managed area. While I would like to see off-road vehicles banned on all but designated public lands, it would be seemingly impossible for any managing agency to control except as noted.

4. While concerns for endangered species, over-grazing and over-logging certainly are worthy considerations, the inclusion of lands within the Flagstaff City Limits is clearly an effort to stop growth in any way possible and under any guise the anti-growth groups can rally around. The 30,000 acres of buffer being proposed for Walnut Canyon is a ludicrous amount of land for that purpose and clearly represents a land grab which, if it comes to pass, will surely face vigorous legal challenges.

5. Our Walnut Canyon Ranch Owners Association has collected opinions on this matter and is contacting as many officials and agencies as we can identify. Our consensus seems to focus on Mr. Baierlien's very well thought out proposal to designate the finalized boundary as a " National Conservation Area". Except for the portion of the Study Area that lies within the Flagstaff City Limits, I support Mr. Baierlein's proposal.

July 8, 2010

HDR/eeM
ATTN: Walnut Canyon Study Area Special Study
9563 South Kingston Court, Ste 200
Englewood CO 80112

My husband and I have lived in Flagstaff for 44 years. We have lived on Old Walnut Canyon Road for 32 years. We are in Flagstaff city limits and yet our property is completely surrounded by the proposed expansion of Walnut Canyon National Monument.

I am very concerned that such an expansion and management by the Park Service would limit or prohibit the current uses of the land surrounding our home. Our road and the area around it are used daily by walkers, runners, bird watchers, bicyclers, horseback riders, and, of course, as access to our home. We don't see every day the grazing and archery hunting that is allowed, but those are currently allowed uses that we also would want preserved.

This proposed expansion certainly does not meet the "National Significance" nor the "Suitability and Feasibility" criteria for National Park lands. I could state the arguments here, but from a quick reading of the criteria in your March 2010 Study Area newsletter, the additional 30,000 acres would not qualify.

Walnut Canyon is a special place, to be sure, and deserves its current designation. However, there is no rational reason to expand the Monument by some 30,000 acres. Who came up with a proposal of such magnitude and with what possible rationale? If it was to preserve a buffer around Walnut Canyon National Monument, it goes way beyond that goal.

I have learned about a designation of public lands called a National Conservation Area that I believe might be the solution. Such a designation, administered by the Forest Service, would allow for the current uses and also protect it from development in the future. The actual size of such a Conservation Area might not encompass the entire 30,000 acres, but that could be determined. With some tweaking of the boundary lines and such a designation, I believe everyone's concerns could be satisfied.

May 23, 2010

Walnut Canyon Study Area Team
9563 S Kingston Court
Suite 2000
Englewood, CO 80112

Dear Study Area Team,

Thank you for the opportunity to comment on the proposed expansion of the Walnut Canyon NM. I have lived at 4576 S Lake Mary Road since 1976. My home is on the western boundary of the proposed National Monument. I've walked and ridden my bike often between Lake Mary Road and Fisher Point – particularly- for 25 years and also explored other adjacent areas as well.

I support the additional protection that NPS designation would offer an expanded National Monument. Increasing Walnut Canyon NM would do more to preserve the rich natural and cultural resources of this area and create a southern boundary to Flagstaff's continued expansion.

Specifically, the management plan for this area should include:

- Preservation of archaeological sites
- Removal of cattle grazing allotments
- Protection of old growth ponderosa stands
- Careful fuel reduction of narrow diameter ponderosas
- Elimination of firearm discharging
- Closure to hunting
- Preservation of endangered species habitat
- Careful management of recreational uses
- Protection of the water resources and their natural systems

I have three concerns that I'd like to mention also.

- Living at the western edge of the proposed new boundaries, I am concerned about access and impact of National Monument guests and parking to my neighborhood (Frontier Homesites.)
- I wonder what would be the constraints for my neighbors and me who are dog owners and use the area east of our homes to walk our pets.
- Finally, why is Marshall Lake excluded from a new national monument? It's addition is critical since it is an usually rich ecological wetland in this immediate area.

There are two other questions that I would like to address. How does Arizona Game and Fish's proposed new shooting range fit into the long term plans for this unique area? Would it be possible to enlarge and thoroughly label the map on the internet and in your flyer about the proposed Study Area?

Please add me to your mailing list. Thank you.

HDR/e2M
Attention: Walnut Canyon Study Area Special Study
9563 South Kingston Court, Suite 200
Englewood, CO 80112

I am commenting on the proposal to expand the Walnut Canyon Park through a study and would like to mention that the community already went through this process in 2002 with the community and some credible agencies overwhelmingly against the expansion. Coconino County, being the second largest county in the U.S., consists of 12 million acres with very little private property. Much of the forest that surrounds this community is already not accessible. The idea of locking up a recreational area in close proximity to Flagstaff used by recreationalists such as hikers, bikers, joggers, campers, bird watchers, rock climbers, hunters, horseback riders and for family outings is simply a selfish endeavor.

I am vehemently against an additional 30,000 acres becoming national park or national monument status for the following reasons:

- The **difference in the roles, missions, and responsibilities between the Park Service and Forest Service is very clear.** The park service serves tourists visiting the site and monitors the preserved natural or historical sites. The Forest Service CLEARLY is mandated to manage multi-use land, paid for the taxpayers for that use. The Forest Service has infrastructure in place providing scientific and technical knowledge to protect and manage forest and rangeland uses including fire suppression and equipment. The Antiquities Act & other documents spell out these different roles very precisely.

- A **FLEA Amendment** to the Coconino National Forest Plan was already completed and addresses main concerns for this management area. FLEA was overlooked in 2002.

- The 30,000 proposed-acre sprawl study area **does not qualify for national monument or national park designation.** The *suitability* does not fit since the management policy of national parks states: that an area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is ***not*** already adequately represented and protected for public enjoyment by other federal agencies; tribal, state or local governments; or the private sector. Since the expansion is already under the United State Department of Agriculture/Forest Service, and since the preservation of the canyon and cultural resources already exists, any expansion does not qualify, is unnecessary and violates its own management policy.

- The proposed expansion encumbers and jeopardizes **private property**. Private property should never be taken into a park. This violates the very principles our country was founded on. Private property has not been respected within other park situations.

- The **Flagstaff community** has taken great measures for the enjoyment of this forest land with recreational facilities including the Canyon Vista campground, the Arizona Trail and several trails connecting the urban trail system. This should be a community-oriented

decision and not of those who live elsewhere or who belong to irrational environmental groups basing their input on emotion or lack of direct knowledge of the area. I will also add that this study was not publicized well at all for local community awareness, and I know many interested people have been totally unaware that this issue surfaced again.

- The debate of the **spotted owl remains very controversial.**

- State and National parks **lack funding** to maintain their current status. Walnut Canyon National Monument expanded in 1996 and has not had the funding to adequately manage that expansion to date. Fencing was just recently installed. How could it be expected for Walnut Canyon for cover financially more territory or manage more forest?

- This proposed expansion puts some of the **ranching community** in harms way with their livelihood and grazing permits. Under a park, grazing permits can be terminated or can have unreasonable restrictions put on the rancher. Currently, wildlife can locate to the area because these ranchers put water in the area.

- I believe any proposed expansion would eventually lead to many legal issues due to the existing infrastructure developed for free, multi-use purposes.

No one questions the uniqueness and beauty of Walnut Canyon, which is already preserved and should remain just as is.

I will reiterate that this land in the study area lacks specific, significant criteria for national park status and should remain with the Forest Service, as the study area is suited for multiple-use and should remain as such, at no cost, for public access and uses. Since some citizens and government agencies are concerned with development, I would not be opposed to the consideration of the area being put as a National Conservation Area which would allow the Forest Service to do what they are mandated to do in multi-use land management but would not allow land exchanges for future development.

Please consider this study area to remain with the Forest Service, and if necessary, consider a proposal for a National Conservation Area.

cc: Senator John McCain
Senator Jon Kyl
Coconino County Supervisor Mandy Metzger

July 22, 2010

HDR/e2M
Attn. Walnut Canyon Area Special Study
9563 S. Kingston Court, Ste 200
Englewood, CO 80112

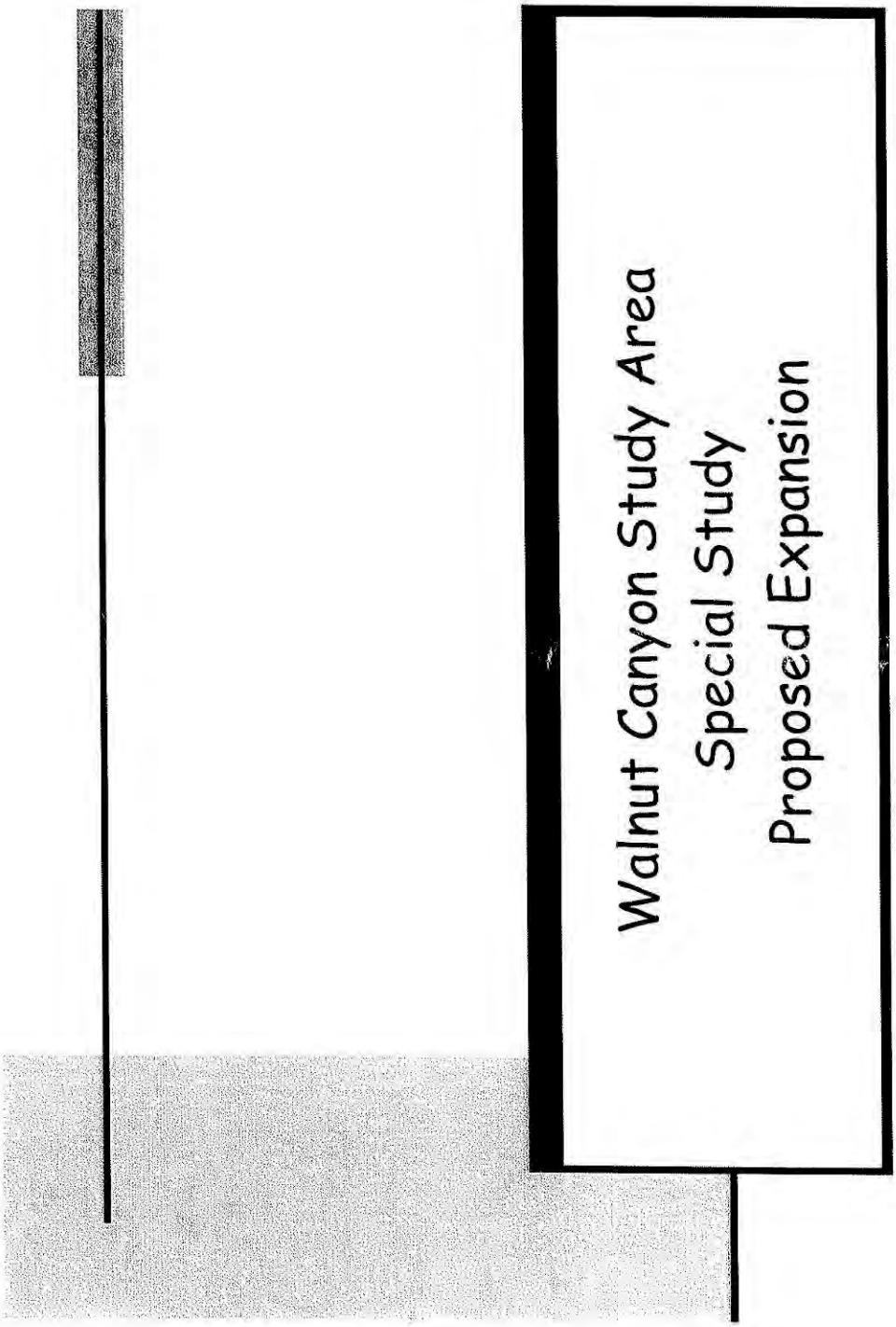
I am writing to express my objection to any expansion of the Walnut Canyon National Monument near Flagstaff, Arizona.

The use of the land surrounding the current National Monument is widely used by local residents as well as out-of-town visitors. This use supports the local economy and should not be restricted by additional government involvement.

While I am a twelve year resident of the immediate area, having lived on Old Walnut Canyon Road since 1997, I would hold these same opinions no matter where I lived. The current rules and regulations with regard to the study area are entirely appropriate and need no changes.

I would support the establishment of a National Conservation Area managed by the Forest Service so long as there would be continued input from local users.

Thank you for your consideration.


Walnut Canyon Study Area
Special Study
Proposed Expansion

Background of proposed expansion in 2002

- In 2002 the proposed expansion has already gone through a public hearing process falling on deaf ears.
- A credible Forest Service FLEA amendment to the Lake Mary area ecosystem report, scientifically researched and evaluated, was essentially overlooked during the 2002 process.
- Respected agencies voiced opposition to the expansion including Coconino NRCD, Arizona Game and Fish Commission, Arizona Wildlife Commission, Arizona Farm Bureau Association and Coconino County Farm Bureau/Cattle Growers Association.
- Other groups such as hunters, hikers, mountain bikers and other recreational enthusiasts wrote letters and attended the public meetings in large numbers.
- The 2002 proposed expansion put grazing allotments and private property in jeopardy.
- Walnut Canyon expanded in 1996 in large part to eliminate logging and just recently fenced that expansion.
- Flyers were distributed threatening the public to support the expansion stating **falsely** that there was already some proposed development in the area.
- The 2002 proposed expansion was basically initiated by a small group who spoke very consistently and loudly to local agencies, 'The friends of Walnut Canyon.'
- No one questions the beauty of the existing Walnut Canyon Monument – in 2002 or now.

Mission Statements and practices between National Park Service and Forest Service are Very Different

- National Park Service 'preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.' (and for a price….my added thought)
- Forest Service's motto is *Caring for the Land and Serving People.* The Mission statement covers many responsibilities. Some pertinent ones include:
- Protecting and managing national forest and grasslands so they best demonstrate sustainable multiple-use management concept.
- Developing and providing scientific and technical knowledge aimed at improving our capability to protect, manage, and use forests and rangelands.
- The Forest Service has a complete fire suppression program.

Logical points for opposition to expansion

- Proposed study expansion sprawls **unnecessarily** over 30,000 acres and is easily perceived as nothing but a land grab.
- This would negatively affect recreation and hunting
- It affects approximately 4 ranchers and grazing rights. Grazing rights within a park come with strings and restrictions or may not be allowed at all.
- The best use of this 30,000 acres does not to fall within national park criteria.
- The area, according to the national parks' own suitability criteria, does not qualify for park status.
- For it to be suitable for addition to a national park system, it must represent a natural or cultural resource type that is **NOT** already adequately represented in the national park system; Or if it is not comparably represented and protected for public enjoyment **by other federal agencies – for which it is** already protected by the Forest Service.
- The Forest Service's mission best suits the multi-use public lands area.
- This area includes: The Campbell Mesa trail system; both the Arizona Trail and the Flagstaff Loop Trail pass through this study area.
- This area jeopardizes private property already in existence.
- National parks have been closing with limited or no funds – let alone expand.
- The public should not be limited to inner city recreation but should have access to free public, multi-use lands.
- No NEPA study (National Environmental Protection Act) was done to justify the 1996 expansion or the 2002 proposed expansion.
- Protection of the canyon and archaeology site are already in place and protected currently through the Walnut Canyon National Monument.

Questions

- How to address rabid environmentalists?
- How to counteract environmental organizations such as the letter from Sierra Club?
- Including spotted owl – someone knowledgeable with information to include in our letters
- Can we get opposition letters to the expansion from the Arizona Wildlife Commission, Az Game and Fish, NRCD as they opposed expansion in 2002?

Possible Solution

- Political atmosphere fears possible land exchanges with the Forest Service.
- For this multi-use public lands area, the apparent solution could be to designate this area as a Conservation Area.
- This allows no development but can remain under the best manager of public lands – The Forest Service
- National Conservation Areas are designated by Congress to conserve, protect, enhance, and manage public land areas for the benefit and enjoyment of present and future generations.
- Other options that do not allow expansion?

There has not been a lot of public notification or advertisement. Many are unaware of this study for a land grab

- Public Comment is due by May 26, 2010.
- The Form is simple and easy to complete or you can write your own letter of concern.
- It can be done online at: http://www.walnutcanyonstudy.org
- Or mailed to HDR Attn: Walnut Canyon Study Area Special Study, 9563 South Kingston Court, Suite 20, Englewood, CO 80112. (A private consultant)
- The information, map and study schedule can be picked up at the Forest Service offices or at least at the Peaks Ranger District off 89A.

Comment Form

1. The study area is important to me for several reasons:

natural beauty

proximity to flagstaff and ease of access

contains flora and fauna that are unusual in flagstaff, e.g., mature red-twigged dogwood

terrific birding, including peregrine falcons in the spring and red-faced warblers in the summer – and of course spotted owls

2. recreational/visitor opportunities/uses

hiking

biking – in certain areas

rock climbing

birding

3. resources

cultural – especially artifacts from native people

water

plant life

soil

wildlife

4. management issues

Primarily the area must be protected from any kind of development. This could be achieved by some kind of federal designation – if not a national park, then perhaps a wildlife area. And certainly the land should never be exchanged for another parcel.

The environment is too fragile to allow motorized vehicles