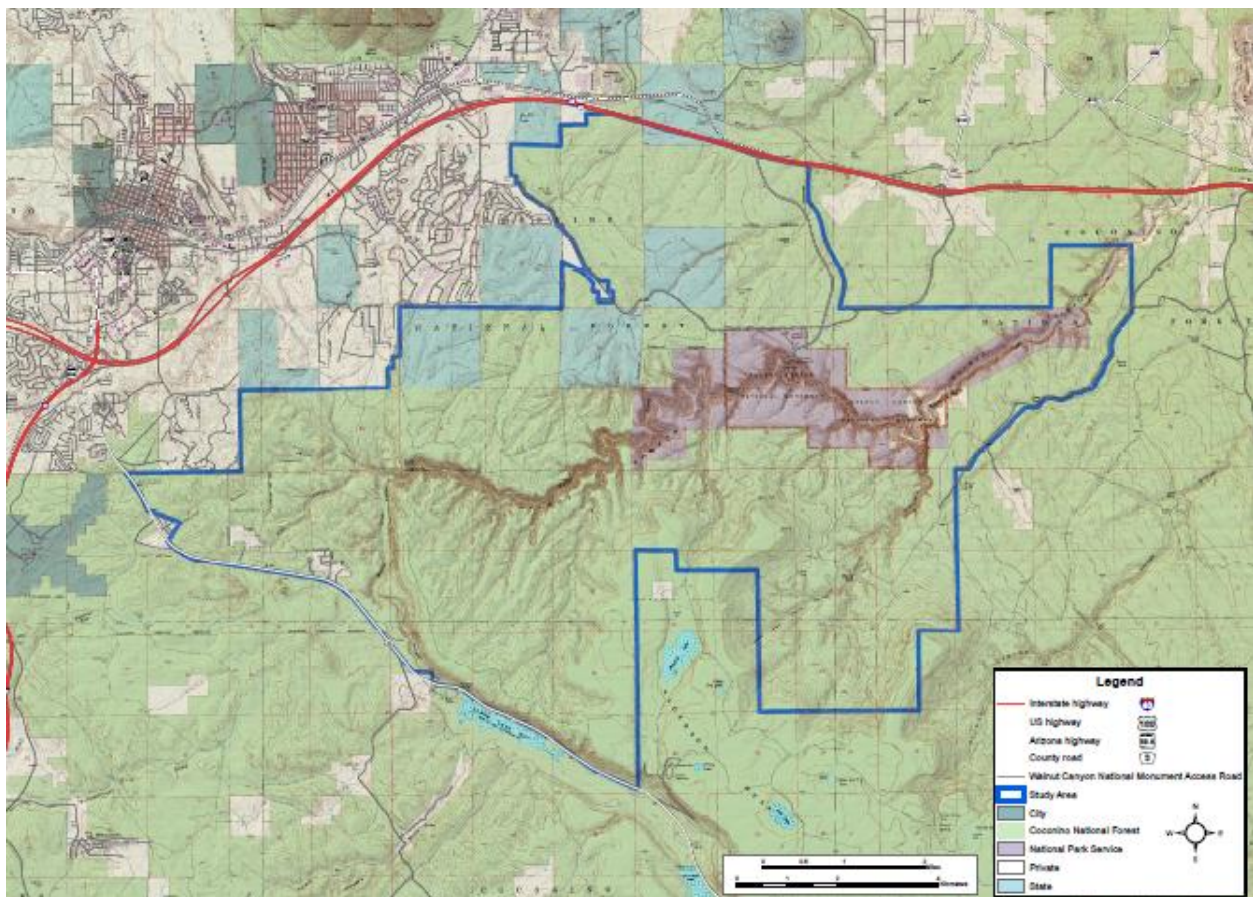


Walnut Canyon Study Area Special Study

WALNUT CANYON SPECIAL STUDY COMMENTS MAY 2011 THROUGH JULY 2011



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**WALNUT CANYON SPECIAL STUDY
PUBLIC COMMENT SUMMARY
OUTREACH PERIOD FROM AUGUST 1, 2010 - JULY 30, 2011
AUGUST 2011 - DRAFT**

INTRODUCTION

On March 30, 2009, President Barack Obama signed into law the Omnibus Public Land Management Act of 2009 (the Act) as passed by the United States Congress. The Act includes language directing the Secretary of Agriculture and the Secretary of the Interior to conduct a special study on management options for an area within the Peaks and Mormon Lake ranger districts [since consolidated and renamed the Flagstaff Ranger District] of the Coconino National Forest (managed by the U.S. Forest Service [USFS]) and surrounding Walnut Canyon National Monument (managed by the National Park Service [NPS]). The study area (referred to as the Walnut Canyon Study Area) includes federal, state, and private land, and comprises approximately 30,000 acres, 10 miles south and east of Flagstaff, Arizona.

The USFS and NPS are jointly initiating a special study with Coconino County and the City of Flagstaff to explore management options for the Walnut Canyon Study Area. This study will focus specifically on the following management options:

- Suitability and feasibility of designating all or part of the study area to Walnut Canyon National Monument.
- Continued management of the study area by the USFS.
- Any other designation or management option that would provide for (1) protection of resources within the study area; and (2) continued access to, and use of, the study area by the public.

A newsletter (#2) was sent to the public; the project-specific Website was updated; and USFS, NPS, Coconino County, and the City of Flagstaff hosted a second series of public open house events. These were methods used to provide opportunities for public input and discussion on development of the special study for the Walnut Canyon Study Area.

The purpose of this document is to provide a summary of public comments received during this second phase of public outreach. The public was invited to comment on the preliminary draft management options developed by the planning team. The preliminary management options, in no particular order, include:

- Continued Management Under USFS - Coconino National Forest
- Management Under National Park Service
 - New Unit of the National Park Service
 - Boundary Adjustment to the Existing Walnut Canyon National Monument
- Special Management Designation
- Focused Congressional Legislation
- Options for Arizona State Trust Lands

PUBLIC OUTREACH, PHASE II

The initial public outreach period was held from March 22, 2010 through May 26, 2010. This second phase of public outreach was initiated on May 10, 2011 through July 10, 2011; however, by request from the Coconino County Board of Supervisors and the Flagstaff City Council, the period was extended to July 31, 2011.

Newsletters:

A second newsletter was prepared and sent to the updated project mailing list via e-mail or U.S. Postal Service on May 10, 2011. The newsletter provided updated project and open house schedules, brief descriptions of the preliminary management options, options for State Trust Lands, and a summary of the management options workshop held with representatives for Coconino National Forest, Walnut Canyon National Monument, National Park Service Intermountain Region, City of Flagstaff and Coconino County.

An initial project mailing list was developed from mailing lists provided by the USFS, NPS, Coconino County, and the City of Flagstaff. The initial mailing list comprised 753 entries. The mailing list for the second public comment period was updated from the comments received during the initial public comment period and included a total of 871 addresses.

Website:

A project-specific Website (www.walnutcanyonstudy.org) was updated to include Newsletter #2, posters that were displayed during the public meetings, and to announce the new and extended public comment period.

Press Release:

Press releases were prepared to announce public meetings and were sent to local newspapers, radio stations, and organizations totaling over 100 media outlets. Announcements were aired on KNAU and posted in the Arizona Daily Sun, at a minimum.

Public Open Houses:

The USFS, NPS, Coconino County, and the City of Flagstaff hosted a series of open house events in May 2011, which were held at the following locations:

Date	Location	Address	Time
May 23, 2011	Flagstaff City Hall Chambers	211 West Aspen Ave	4 – 7PM
May 24, 2011	Sinagua Middle School - Commons	3950 E. Butler Ave	4-7 PM
May 26, 2011	Cromer Elementary School – Commons	7150 Silver Saddle Rd	4:30 – 7PM

The open house events provided an opportunity for the public to hear a presentation on the process and preliminary management options, engage in dialogue with the partner agencies, ask questions, and discuss concerns. Opportunities were available for group and one-on-one discussions. The public was encouraged

to provide input and comment in their own words, either at the open house events or at their convenience on the project Website or on the comment forms.

The number of attendees signing in at the open houses was as follows:

- Flagstaff City Chambers 39
- Sinagua Middle School 22
- Cromer Elementary School 13

PUBLIC CORRESPONDENCE AND COMMENTS

Four written comments were received during the public meetings and an additional 110 comments were received through the website and in hardcopy form or letter for a total of 113 comments.

All correspondence was read and analyzed. Attachments to comment letters are in the project file for reference during later phases of the study. All comments were entered into an Excel database, and all comments and attachments will be distributed to the project planning team. These comments will be considered during refinement and analysis of the management options in the next phase of the project.

COMMENTSUMMARY

Of the 113 comments for Phase II, the majority addressed the types of uses that should be maintained in the study area. It should be noted that no specific questions were asked, but those commenting were free to express any concerns about the area, its management, or process of the study.

In the majority of the comments, preference was expressed to maintain the following current uses:

- Biking - 40%
- Equestrian - 20%
- Open to all uses/multiple use - 16%
- Hiking/running - 15%
- Non-motorized uses - 8%
- Grazing - 8%
- Hunting/fishing - 6%
- Camping - 3%

The following uses were mentioned once or twice:

- Picnicking
- Allowing ATVs during hunting season only
- Limited vehicle use
- Photography/painting
- Rock climbing
- Wildlife viewing
- Geocaching
- Cross country skiing/sledding
- Use of off road vehicles
- Consideration for allowing solar and wind farms
- Designated area for shooting

Walnut Canyon Special Study Comments Through August 2011

The following uses were opposed in less than 1% of the comments:

- Wind farms
- Hunting
- Off road vehicles
- Snowmobiles
- New and improving existing roads

Approximately 8% stated that the areas should remain free and oppose any fees for use.

Some public comment expressed :

- Opposition to encumbrances on/access to private property - 5%
- Lack of funding for adequate management by NPS- 5%
- Adequacy of NPS to address fire and fire management - 1%
- Opposition to new road development - <1%
- Opposition to development on State lands - <1%
- Opposition to U.S. Forest Service land exchanges - <1%

Some public comments expressed preferences for the preliminary management options:

- Special Management Designation (13%)
 - Support NCA - 11%
 - General(unspecified) special management designation - 1%
 - Research and education designation - <1%
- Expansion of Monument/transfer to NPS - 11%
- Continued management under Forest Service - 9%

Approximately 7% stated opposition to transferring responsibility to NPS or expanding the Monument. One commenter opposed designation as a National Recreation Area stating that emphasis should be on conservation.

A few commenters provided other management options. Two commenters supported the Wilderness designation. One commenter suggested that the study area should be transferred to NPS, but expansion lands would continue to have no fee and allow all uses. Another commenter suggested a 1-mile undevelopable buffer zone around Monument (motorized use not allowed in buffer zone) and suggested that the City of Flagstaff create small village developments mid-way between Butler and Wakonda roads and the buffer zone. One commenter stated that decisions about development should be made at the local level, and not the federal level.

Comments were also received regarding State Trust Lands. Two comments stated that the State Trust Lands should be protected from development; another commenter stated that the State Trust Lands should be included in the Monument; and one commenter said that the State Trust Lands should be purchased.

A few comments were received on the Study Area boundaries. One commenter stated that the water treatment plant should not be under NPS jurisdiction while another commenter said that all private lands and City of Flagstaff lands should be excluded from the Study Area.

A couple of comments were received from people that are disappointed that NPS eligibility studies are not yet available. Two commenters expressed a desire for the study to end and the issue be closed.

A few comments were also received on the shooting range: one in support of the range and two opposed to the range. (Note: This is in reference to an AZ Game and Fish Department shooting range under development near the Study Area, but outside of its boundaries.)

Responses from American Indian Tribes

On July 28, 2011, the Park Service and Forest Service sent a joint letter to the 16 tribes who claim cultural affiliation to the Walnut Canyon area. To date, a letter was received from the Hopi Tribe. The body of the letter follows. The Hopi have accepted an invitation to meet and discuss the special study.

Dear Superintendent Chung and Supervisor Stewart,

This letter is in response to your correspondence dated July 28, 2011, regarding the National Park Service, Flagstaff Area National Monuments and United States Forest Service, Coconino National Forest continuing to collaborate on the Walnut Canyon Special Resource Study.

The Hopi Tribe claims cultural affiliation to the Sinagua prehistoric cultural group in Walnut Canyon National Monument and Coconino National Forest. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be “footprints” and Traditional Cultural Properties. Therefore, we appreciate the Monuments’ and the Forest’s continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office understands management options are being explored for 30,000 acres of the Coconino National Forest that surrounds Walnut Canyon National Monument, which would provide for protection of the resources within the area while providing continued access and use of the area as directed by the 2009 Omnibus Public Land Management Act.

We have reviewed the enclosed newsletter regarding the Walnut Canyon Special Resource Study, which presents conceptual management options. Protection of cultural resources and continued access and use can be contradictory management goals. We support protection of cultural resources and traditional cultural uses as management priorities, and we request copies of the National Park Service resource surveys and required analysis on national significance when they are completed.

Responses from State Agencies

The Arizona Game and Fish Department (Department) wishes to respectfully submit the following regarding potential management options for the area surrounding the current Walnut Canyon National Monument, i.e. the Walnut Canyon Study Area (WCSA). Department representatives attended the Open Houses held in Flagstaff on May 23rd and 26th and have reviewed the various management alternatives detailed in the Walnut Canyon Special Study Newsletter #2. The Department previously submitted written comments on May 7, 2010 and wishes to reiterate and expand upon a number of the points made in that prior letter for your further consideration:

1. The Arizona Game and Fish Department supports management options for lands within the Walnut Canyon Study Area that will ensure the protection of this area from development in perpetuity.
2. The Department supports continued mixed recreational use within the WCSA, including hunting and other appropriate uses such as wildlife viewing. 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, and which cause damage to the golf course and homesites and produce frequent and unpleasant close encounters with residents which the Department is often called to address.
3. The preference of the Department would be continued U.S. Forest Service ownership and management of WCSA lands outside current Monument boundaries, as we feel this would best ensure both protection of WCSA lands from future development and continued mixed recreational access including hunting as described in points #1 and #2 above.
4. If any expansion of the current boundaries is considered, the Arizona Game and Fish Department remains concerned about the future disposition of Arizona State Trust Lands within (Sections 22, 28, and part of 10) and adjacent to (Sections 20 and 30) the WCSA boundary. The Department views potential development and urban expansion on these sections as one of the principal threats to the ecological integrity of lands within the WCSA, and development here could lead to an increase in human-wildlife conflicts as described in item #2 above. Our preference would be for a mechanism (e.g. land exchange, reclassification through the Arizona Preserve Initiative and subsequent purchase, and/or conservation easements) by which development on these ASLD parcels would be precluded in perpetuity. Information provided by the Walnut Canyon Special Study suggests that the only mechanism for acquiring State Land parcels is through lease or purchase at auction; that exchanges of State Lands (e.g. for U.S. Forest Service or National Park Service lands) are precluded; and that the Arizona State Land Department is considering designating portions of Sections 20 and 30 as undeveloped buffers to be placed in a conservation easement at the time of any future sale. The Department appreciates the willingness of ASLD to preclude development on portions of the latter sections, but also encourages further exploration of measures to prevent future development on the totality of State Land parcels within and adjacent to the WCSA.
5. The Department supports managed OHV use in the WCSA, preferably similar to what the Department has been advocating for in the Coconino National Forest's revised Travel Management Rule. For Coconino National Forest's TMR, the Department supports general OHV access on designated roads and trails. The Department also advocates for motorized cross-country retrieval of big game. This means that hunters could use OHVs to retrieve downed and tagged game animals only, and would not permit cross-country 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 in the Flagstaff urban interface as described above. The Department 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.

The Arizona Game and Fish Department understands that the National Park Service is currently completing resource surveys and their analysis to determine whether lands in the Walnut Canyon Study Area meet NPSs criteria of national significance, suitability, and feasibility for addition to the national park system (either as a new park unit or as a boundary adjustment to the current Walnut Canyon National Monument). According to the schedule provided in the WCSS Newsletter #2 the results of this analysis, due to be completed in summer 2011, will be integrated into a Draft Special Study Report and will determine whether National Park Service management of some or all of the lands in the WCSA remains a viable option. Given that the NPS resource study was not available at the time of the May 2011 Open Houses and latest Phase II cycle of public engagement, the Department requests that subsequent public/stakeholder review of the Draft Special Study Report currently scheduled for winter 2011 include an additional comment period, preferably including another series of public Open Houses as requested by many attendees to the May Open Houses in Flagstaff. The Department feels it will not be able to adequately evaluate the final suite of proposed management options and their respective tradeoffs absent this level of public engagement during the final phase of the Walnut Canyon Study Area Special Study.

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
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Flagstaff, AZ 86001
928-214-1252

The Arizona Department of Transportation and the Federal Highway Administration, as lead federal agency, are conducting engineering and environmental studies to develop a long-range plan for the improvement of the Interstate 40 corridor west of the Bellemont traffic interchange to east of the Winona traffic interchange. The study area extends along I-40 from mileposts 183 to 214 in Coconino County, Arizona (Figure 2). The 31-mile segment of I-40 between Bellemont and Winona is currently a four-lane divided highway. Proposed alternatives involve widening I-40, expanding and/or adding traffic interchanges. For your reference, information about the I-40 corridor study can be found at project website: <http://www.azdot.gov/I40studyflagstaff/>

A letter dated July 9, 2010 was sent to Walnut Canyon Special Study Team describing the I-40 corridor study with an invitation to attend the agency information meeting which ADOT had hosted in Flagstaff, AZ on August 5, 2010. Proposed improvements are being recommended at Walnut Canyon TI (MP 204.87) along with roadway (I-40) widening. Please refer to attachments to this letter.

Walnut Canyon Special Study Comments Through August 2011

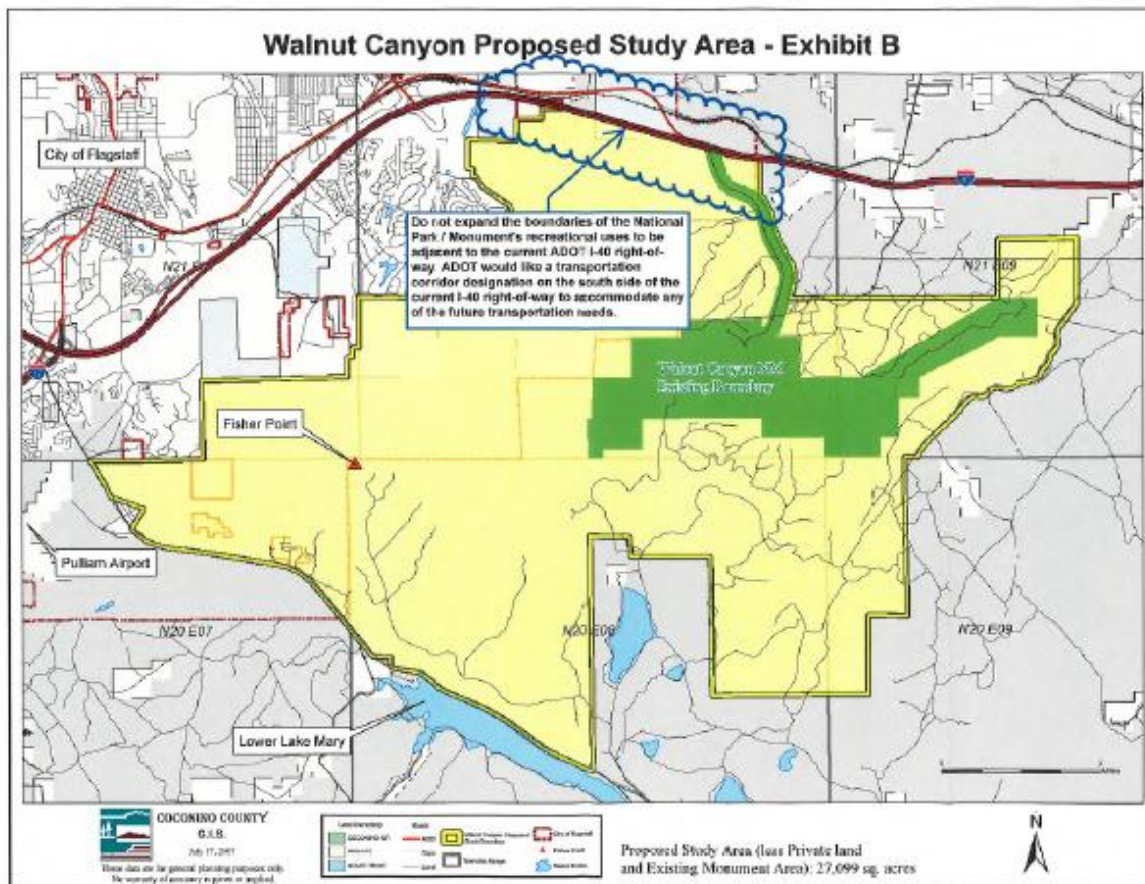
Therefore ADOT would like to submit a comment regarding the potential boundary expansion of Walnut Canyon National Monument. Our comment is as follows:

"Do not expand the boundaries of the (Walnut Canyon) National Park / Monument's recreational uses to be adjacent to the current ADOT I-40 right-of-way. ADOT would like a transportation corridor designation on the south side of the current I-40 right-of-way to accommodate any of the future transportation needs."

Attached to this comment letter is the Walnut Canyon National Monument boundary map where the area of concern for future transportation use is highlighted for your reference. If you have any question regarding this comment please do not hesitate to contact me by email at amansor@azdot.gov, or by phone at (602) 712 6961. My address is as follows:

Aszita Mansor
ADOT - Roadway Predesign Section
205 S 17th Ave, MD 605E

Phoenix, AZ 85007



Organizations

Official representatives from the following organizations providing comments:

- Arizona Farm Bureau
- Flagstaff Biking Organization
- Coconino County Farm Bureau and Cattle Growers Association
- Sierra Club Grand Canyon
- Friends of Flagstaff
- Friends of Walnut Canyon
- Coconino Horsemen's Alliance