

## Walnut Canyon Study Comments - May - July 2011

### COMMENTS

Once again you are having public meetings, and once again you have failed to notify those adjacent the project area. I have sent comments to you on this study project, given you my email and address, but Nope.... no notification. I think perhaps you don't want to hear from anyone unless they like the idea of expanding the NPS onto our multi-use, really open to the public lands. I suggest you send emails to all those who have commented, so we can know what is going on. Did you lose my comments again??? I am sending my comments again, just in case. Please respond so I know you are getting this.

Thank you for mailing your newsletter to the NAF PO Box- As Vice President and Newsletter Editor, I pass this information on. Taking the hardcopy newsletter to the meeting and passing on the Web Site.

However we need to update your mailing label information. Instead of addressing the Newsletter to Todd Rovelstad or another specific person, please address corospondance to NAF President/Vice President. PO Box and remainder of address is unchanged.

Herel have lived in Flagstaff for over 30 years and fully support the proposed shooting Range. I'm tired of going to cinder pits, and in the forest randomingly to shoot for target pracitice. This is a great location and will not disturb Walnut Canyon Monument.....

The Coconino Horsemen's Alliance, a 501(c)(3) Public Charity, supports continued access to the study area for trail riding activiities. Thank you, Sally Stults, CHA President.

The area around Walnut Canyon is beautiful, archeologically significant, and relatively undisturbed by development, despite its close proximity to the city of Flagstaff. Any reasonable effort should be made to keep it that way, and expansion of the NPS boundaries is clearly the most direct way of accomplishing this protection.

Moreover, there are now numerous precedents for looking beyond delineated boundaries at environmental impacts on protected federal lands. Courts have upheld cases against the government when National Parks have been adversely impacted by development on surroundng public or private lands. This is clearly the case with the proposed shooting range that lies barely a quarter mile outside this study areas boundary. The noise and usage impacts will be felt within the parks current boundaries, and will no doubt impact the study area even more significantly.

If the agencies involved in this study are truly serious about protecting the study area, noise and usage impacts occuring on immediately adjacent lands must be examined and addressed. Sound pollution and wildlife impacts cannot be stopped by a boundary line, any more than erosion or flooding. If this area is significant enough to be worth studying for inclusion in an expanded Walnut Canyon monument, then any developments that would adversely affect the area should be put on hold while that significance is evaluated. Otherwise, this whole study is just a waste of taxpayer dollars.

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It is important to keep trails accessible to hikers, mountain bikers and horse back riding. I oppose having to pay fees to enjoy our public lands. Having that much public land is one of the reason that I live here!

I am in favor of a 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.

Perhaps a National Conservation Area or game preserve would be appropriate.

I am quite opposed to incorporating this area into the National Park system or giving it National Recreation Area designation.

Please keep Walnut Canyon open to all non-motorized users - especially equestrians. Public lands are for public enjoyment, and recreational users can help keep these lands healthy and protected now and for future generations.

Wendy Erica Werden

Board Memeber - Arizona Trail Association

Club Member - Tucson Saddle Club

As a horse owner in Tucson, AZ and who has enjoyed the Canyon, please leave it open to the public including horse riders (and their horses) The horses enjoy beautiful and new places as well as the riders. Do not close it to us. Thankyou

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Please keep the area open and free to non-motorized use, especially equestrian.

Please keep Walnut Canyon for Equestrian use.

This is the second time we have commented on this taking of public lands.

We are directly affected by this abuse of power. We are permittees on the Coconino National Forest, we have the Youngs Canyon and Deep Lake allotments. The Youngs Canyon allotment is the one that is in the proposed taking of the 30,000 acres of Forest Service multipurpose land. We border the park now on the south east end of the current park.

There is absolutely no reason for Walnut Canyon National Park to be expanded to this extreme base land mass. As is now it is allowable to horseback, trail bikes, hikers, cattle grazing, and camping, hunting, etc. The Forest Service manages this land now for everyone, not just a select few, and then those who are selected will have to pay.

We will lose our cattle grazing on the north side of FS rd. 128 to the park. This is a significant amount of land to lose and will cause our permit to be decreased by several animal units.

Our comment is NO to this expansion.

**Please leave Walnut Cyn open to equestrians. We are running out of places to ride. Developers are taking our trails. Ranches are being split and sold to make room for houses that no one can afford to buy. It is so important for me and my family to be able to get back to nature once in a while.**

Please allow Equestrians areas to have free access for day use and camping facilities for us horse lovers. It's such a beautiful area to ride in!

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Please keep these lands open and free for non-motorized users - especially equestrians.

Our public lands are shrinking by the day. Please keep Walnut Canyon open for horses, hiking and camping. It is a jewel and we all want to enjoy it.

PLEASE keep Walnut Creek open to Equestrians. 1-I've heard nothing but fabulous comments about this area for riding. 2-Public equestrian access is habitually at risk of loss to us. 3-"The West" is all about RIDING. Please protect our interests.

Sincerely yours  
CABingham

As a member of the equestrian community in Arizona and a frequent visitor to northern Arizona during the summer, keeping Walnut Canyon open for use will benefit many.

Please keep this area open and preserved for the use of EQUESTRIANS and non-motorized traffic--in Arizona and otherwise. It is a pristine area and should remain as such. Thank you!

I am an avid equestrian as well as a very respectful guardian of our public lands. Please keep this area open to those of us who not only enjoy it but take care of it as well. Thank You, Jean Ebbert

I support the option not to enlarge Walnut Canyon National Monument. Section 2 of the American Antiquities Act of 1906 (16 USC 431-433) states, "That the President of the United States is hereby authorized, in his discretion, to declare by public proclamation...prehistoric structures...to be national monuments...the limits of which in all cases shall be confined to the SMALLEST area compatible with proper care and management of the objects to be protected..."

I am a frequent hiker in the study area and thereby interested in its future. I have reviewed the documents and comments and find the most compelling arguments to be for a special management designation, probably a National Conservation Area. I am most impressed by the arguments made by the commenter on pages 76-80 of the posted comments and I support them fully. Thank you.

To Whom It May Concern:

Please keep the Walnut Canyon area open to equestrian users. As urban areas continue to increase, we are at risk of losing valuable riding areas.

Thank you

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I don't see the need for further Government rules and regulations for this area. It has no impact on the National part at the site. The land is being used as join-use-land at the moment and futher developement seems unlikely given the watchdog like presents of the "friends of the park," or what ever they call themselves.

Druing the 2002 go around on this issue, there was a general lack of interest in the community and the expansion of the park was dropped. At the moment the public can hike, fish, walk, bike, hunt and camp in the area. Further controlls seem to be designed to only keep out hunting, which was an issue the last time this came up.

As a tax payer I fail to see the use of tax dollars for this study when we can't afford the upkeep of our current parks. I would also like to know, why this issue keeps coming up?

As the former Chief Ranger of the Flagstaff Area National Monuments, I have some familiarity with the area and issue involved in Walnut Canyon. Although I am a huge proponent the National Park Service, I also believe that NPS management is not the solution for all public land management. As I stated many years ago at the beginning of this effort to better protect the lands around the existing monument, I am less interested in which agency administers it, and more interested in how it is administered. My ideal was for the USFS and the NPS to co-manage the area, letting the USFS to manage those things that they are best suited and most experienced to do; fire, grazing etc., and for the NPS to have a role in interpretation, protection, and other areas that fit their expertise. I know that such a model can become complicated and cumbersome unless the respective agency leadership share a common commitment and vision. I believe that this could best be accomplished with the designation as a National Conservation Area. I do not believe that a major expansion of the monument boundary will be supported by Congress, but an NCA might be.

I believe that the best option would be to add all federal lands within the study area to Walnut Canyon National Monument. This is because I believe that all of the relevant National Park Service (NPS) criteria for such an addition would be met, and that NPS would do the best job of managing these sensitive lands to maintain or restore their significant cultural and natural values. NPS management of the entire area would also be most consistent. In contrast, I do not trust the Forest Service or any Arizona state agencies to adequately protect these sensitive lands, as they tend to put local commercial interests above the overall public interest. Thank you for considering my comments.

I?m 100% opposed to any further expansion of The Park Service in the Walnut Canyon area. In fact, I?d like to see their activity reduced to their original footprint before the last expansion. They don?t have the same mission as the US Forest Service. Keep our public lands open and accessible to all and at all times of the day.

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We have lived in Flagstaff since 1973 and support protecting the natural resources at Walnut Canyon. They are valuable resources and worthy of protection.

However, those resources are already protected by its inclusion in the Walnut Canyon National Monument. In addition the Monument size has previously been increased to further ?protect? the canyon.

It is stated that additional areas around Walnut Canyon should also be protected as they are valuable resources. It is true they are valuable resources. But using this logic we would put everything in the United States off limits because it is all valuable resources.

In its original size, Walnut Canyon National Monument was fenced off. Hiking, biking, horseback riding, camping, hunting were not permitted within the area. But areas around the monument remained open for those purposes. However, when the monument size was increased, new fences went up and activities previously permitted were no longer allowed. Areas the public was able to enjoy were now behind the fences. Access was prohibited. Public land that was available and used by the public was taken away.

We object to increasing the size of the Walnut Canyon National Monument. This will result in taking additional land away from the public; land that is close to Flagstaff and available for the public to use and enjoy. Access has been easy for hikers, bikers, horseback riders and anyone wishing to enjoy the forest. The public will be required to travel further distances to find open areas of the forest to enjoy and recreate.

Continued management of the land under the Forest Service is preferable as it is managed for multiple purposes and allows everyone to use the land. Enlarging the Walnut Canyon National Monument will deprive the public from the use of the land for the benefit of a few.

Thank you for the opportunity to comment on the Walnut Canyon study plans.

I am concerned about gun shot sounds traveling miles from the range and the increase of traffic (vehicles and camping). These factors will affect the wildlife corridors in the Walnut Cyn area. It could disturb the habitats of birds, deer and elk.

I have seen shooting areas in Arizona, and people don't keep them clean. There's a lot of trash that is left at shooting areas -- discarded target items, plastic shot gun shells that never biodegrade, cigarette butts, beer bottles... I am concerned that a shooting area near Walnut Cyn will disturb the quiet peacefulness of the area that animals and people enjoy, and that the litter will ruin the beauty of the area.

My family and I are recreational users of the study area for Walnut Canyon. We are mostly concerned with user access for hunting, horseback riding biking & hiking. We believe the park has grown twice now and is quite big enough. The study area encompasses areas from Cosnino to the Airport and we believe the current usage and stewardship should NOT be changed. Please consider this request. Thank you. Janet Clammer

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Thank you for presenting the options so clearly and for providing useful maps. Following are my opinions on the future of the Study Area:

1. Preservation of the Study Area should mean prohibiting new or improved roads anywhere within it.
2. All current uses except motorized (primarily ATVs) should be allowed. Perhaps an exception allowing ATVs could be made during large mammal hunting season only.
3. State Trust lands within the Study Area should be protected from development as well.
4. Access should remain free of charge.

All lands in the study area should come under the National Park Service/DOI. The forest service cannot be trusted to maintain these important lands in any form of good environmental standards. Also, State land sections should be purchased/swapped to be included under NPS/DOI jurisdictions!

The area should remain open to bicycle traffic.

Lots of volunteer time, paid worker time and money have been spent building trails in the area that are used by bicycles as well as horses and hikers.

Bicycles do not damage the area. Horses do create damage.

If you are going to allow horses, you must allow bicycles also.

I am 100% against expansion of the Walnut Canyon National Monument. Under direction of the Forest Service, the proposed expansion area is open to nearly unlimited public use. Access to the area is nearly unlimited and multiple use of the area is supported - this is what public lands are for. Under the park system, use would be limited as would be access to the area, both of which is another example of governmental intervention into the rights of individual citizens.

As a concerned citizen, I ask you - please DO NOT go forward with the proposed expansion of Walnut Canyon National Monument.

Thank you.

Dave Cospers

I don't believe that the park should be expanded because it already protects Historical assets. This expansion will include trails that I love to hike, Fishers Point and the AZ Trail, on these same trails I haven't seen any of the historical assets like the one at Walnut Canyon. If we protect every little item that historical significants then you will be taking all the land. That is not why the National Parks were created. I see this expansion as an abuse of our National Parks system.

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Please consider these comments:

The entire study area should be managed by the National Park Service. I feel that this will provide the highest level of protection for the study area.

Hikers should be able to hike in the area without paying a fee.

Since all of the State Lands within the study area are outside of the Urban Growth Boundary, they should all be included in the National Monument.

A designation which keeps all development including houses and highways out of the Study Area in the future should be considered.

We are permittee holders in the Young Canyon allotment, and are gravely concerned about the expansion of the Walnut Canyon Monument.

1. We believe it will cause an overload in the outlining area surrounding the new perimeter. People from Flagstaff come out to this area because it is so close to town, and can be accessed so readily for picnics, biking, horsebacking, hiking, camping, and Hunting.

If this is TAKEN by the Monument it will make a huge impact on the traffic around the area. The Forest Service must be concerned about this in order to prevent over abuse of forest. The Fish & Game should likewise be very concerned about the taking of so much wildlife out of the equation.

2. The catastrophic wildfires we are seeing around this state, should give pause to any official of the possibility of this happening in this area too. The forest needs to be managed, not bottled up for a few individuals to enjoy. If there were a fire, our allotment would be right in the path of such, and indefensible due to the overgrowth of this area already. There are large patches of beetle infected trees down and dead all over the New Monument boundaries. I cannot conceive of any Forest Service Ranger being in favor of such foolish governing by a Federal Agency.

3. We attended a meeting at Cromer School in April, when it was suppose to be a question and answer session, but, we recieved no answers to our questions. No one seems to know anything after all this time. Who are these individuals representing that they can't answer the questions of concerned people who are not in favor of this Monument expansion? They just pass the buck!!! It is a sorry lot of Federal Employees doing a study, that they know nothing about.

Please submit this with all the other comments being sent your way.

Young Canyon Allotment Permittees  
Jim & Duree Shiew



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We have owned two homes in the study area for some 40 years. They are located in the area referred to as Heckathorn acres by the riding stable on Lake Mary Road. The homes are occupied by our family year round.

At two edges of our 2 acre lots is National Forest lands with a NFS sign that prohibits all motorized traffic east of that point. To the north a path leads to a small tributary canyon that we have used for many years to access the floor of the Walnut Canyon drainage south of Fisher Point.

We hope that future generations of our family will be able to access this lovely area for hiking and visiting the caves at Fisher Point. As members of the Arizona Trail Association, we hope that the trail will continue to pass near our property too.

We have enjoyed Walnut Canyon both when hiking on the Arizona Trail and for seeing the Native American ruins. We take house guests from Phoenix and from Pine to enjoy the beauty of the Canyon.

Campbell Mesa and Walnut Canyon are areas that I ride a bike in frequently. Campbell Mesa is one of the few areas that beginner off road cyclists can ride in the Flagstaff area. They should remain accessible to bikes and not require a fee to use.

Thank you,  
Alex Koss

I am an avid mountain bike, trail runner, geocacher and passionate about the outdoors. Keep Campbell Mesa, AZ trail open to all outdoor activities and keep them free for use. Please keep them open and accessible to everyone.

Enter Comments Here: My decision to move to Flagstaff fifteen years ago was greatly influenced by my mountain bike ride to Fischer Point. What a beautiful place and what a spectacular ride for a beginner. Any town where you could ride twenty or thirty minutes from downtown and end up at a place like Fischer Point was worth living in. I still love riding to Fischer Point, although my skill level has increased a little. Please do not exclude mountain biking from this fantastic area. I have never ridden into Walnut canyon beyond Fischer Point and I respect this exclusion, but the ride to the Point and the ride along the rim of the canyon on the Arizona Trail are amongst the most spectacular bike rides anywhere. Please don't take this away from our community.

As a local mountain biker I frequently ride the Campbell Mesa trails, the Arizona Trail, and sections of the soon-to-be-completed Flagstaff Loop Trail. It is my understanding that the Walnut Canyon area surrounding the current national monument is under consideration for National Park administration, which may impact bicycle access to these trails. These trails are accessible to all levels of mountain bicyclists and offer a unique riding experience along the canyon rim that are notably different than the trails on the San Francisco peaks area. It is my strong desire that this study conclude in the continued allowance of mountain bikes on all of the trails around the Walnut Canyon National Monument. Thank you for considering my input on this matter.

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I have assisted in the construction of the Campbell Mesa trails and in maintenance of the Arizona Trail in this area.

My 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. 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.

I 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.

I am 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. 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.

I 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.

I am concerned that trails that are currently free to ride may become part of a fee area, as Walnut Canyon National Monument currently is.

Please don't close the trails around or in the Walnut Canyon and Campbell Mesa areas! It is important that we all be able to continue mountain biking in the Walnut Canyon, Campbell Mesa areas. Flagstaff is widely known and loved by cyclists of all types and it's important to keep our outdoor activities open to our residents and visitors. Thank you.

Walnut Canyon area (non national monument) and Campbell Mesa should remain open to mountain bikes and all forms of non-motorized travel.

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I am providing both of my residential addresses as I maintain two residences in Arizona. I support the position paper submitted by Flagstaff Biking. I hike and bike these areas. I support multi-trail user designations for all public lands with the exception of designated Wilderness Areas (in which case I agree with cyclist exclusion). As a mountain biker, I have volunteered for many hours of trail maintenance and as a whole, I submit that mountain bikers give back as much or more than other trail user groups. Excluding cyclists from Walnut Canyon Study Area and Campbell Mesa would be an insult to responsible cyclists. Although I support equestrian access to trails, I would note that equestrian use has a much greater impact on trail erosion than bikes. The Park Service has followed a misguided policy over the years of favoring horses over bikes. One of the few things President Bush did that I agreed with was ordering the Park Service to reverse this policy. Please maintain multi-user access to these areas.

Thank you,  
Jim Stabler  
Attorney At Law  
AZ State Bar No. 3773

Please keep the Campbell Mesa and Walnut canyon areas accessible to mountain biking.  
This is very important to our community

I am voicing my preference that the special trails on Campbell Mesa, the Arizona Trail and the Flagstaff Loop trails remain free and open to mountain bike riding and trail running. They are why I live here. Thanks!!!

I am a frequent user of the area under study and spend many of my lunch breaks riding and running in the area. I also frequently visit the area on weekends and evenings. I cannot support any changes to the usage of the area. The area is heavily used by mountain bikers and this use should not be limited. It does not cause any conflicts that I have seen in 15 years of riding in the area. The area is now well managed and I very rarely see any inappropriate uses of the area. Further restrictions will impact current users and will not provide any additional benefit to the general populace. There may be a handful of users that would like to see further restrictions, but the entire community should be considered of the desires of a few.

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My wife, 19 year old son and I live on the eastside of Flagstaff. One of our favorite cycling routes is Route 66 to Campbell Mesa and Walnut Canyon area trails. These trails are very easy for us to access.

Campbell Mesa is our favorite place to ride singletrack in Flagstaff. The loops are just the right distance and the grades not too steep. This is especially important to my wife who has a knee problem and can't ride many other trails besides the ones at Campbell Mesa.

Myself and a group of friends also ride Campbell Mesa trails at night. The trails are mostly smooth and predictable--perfect for night rides and the best routes for such we have found in Flagstaff. We used to ride Waterline at night until the Schultz fire destroyed that road and surrounding timber.

On weekends, when we take longer rides, we enjoy the Arizona Trail and FS roads south of Campbell Mesa or just north of Walnut Canyon. This area is perfect for locals on weekends who want to avoid the crowds at areas like Schultz Creek and Mt. Elden. Plus, as stated above, the trails south of Campbell Mesa are relatively flat which is perfect for our riding style and limitations.

Please consider our needs and present use of these areas when considering and planning future use for Campbell Mesa and the Arizona Trail region south of Campbell Mesa.

Sincerely,

John S. Rogers, Flagstaff

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I am writing to you as the representative of the Coconino County Farm Bureau and Cattle Growers Association to express our concerns about the proposed 30,000 acre expansion for the existing Walnut Canyon National Monument.

This national monument was expanded just a few years ago to its present size. The Park Service has not fully utilized the lands that they acquired in that first expansion, and only got those lands fenced a short time ago. The public cannot utilize the existing national monument as it is, and will not be able to utilize the majority of the existing monument in the foreseeable future either. The public is only allowed to venture into the monument in one area, and that is where the visitor center is located on the rim of the canyon near the Walnut Canyon ruins. All other areas of the national monument are off limits to all activities of the general public except a limited amount of hiking near the visitor center. The small fraction of the existing park that general public may use is practically microscopic in comparison to the great area of the already existing National Monument. The public owns the park but is not allowed to use the park? That is outrageous, and clearly wrong. We cannot see any reason that more land should be locked up and away from the very people that own the public lands in the study area, and have been using those lands for over a hundred years as multiuse lands under the care and protection of the United States Forest Service. The Forest Service has shown itself, over the last hundred years, to be more than capable of having the leadership ability and conviction necessary to manage and maintain these forest lands to the high standards that they have set, and met, for the care of the environment and public alike. The Forest Service has done an exceptionally good job of management of our forests and they should continue to have that responsibility in the future.

The existing public utilization of these multiuse lands include many varied recreational activities: hiking, biking, horseback riding, cross-country skiing, hunting, photography, landscape painting, sledding, fishing, rock climbing, wildlife viewing, and picnicking to name a few. Many folks just like to get out and enjoy the beautiful outdoor setting. The Arizona Trail which winds its way through the western edge of the proposed study area as well, is of great importance to recreational activities in the Flagstaff area. The Flagstaff residents and many non-resident tourists alike, have enjoyed the close proximity of the forest and many look upon these lands in the sprawling 30,000 acre study area as "our back yard".

In addition to the recreational activities, there are many other public and private uses to consider.

Multiuse of public lands means utilizing the peoples' lands for the greater good of as many of the nations' people as possible. Other than recreation, these forests are used for some very important commercial ventures as well. There are several grazing leases in this study area, ranches which are the lives and livelihoods of several families which have been running their cattle on these lands for at least a couple of generations. Just off Lake Mary Road is Hitchin' Post Stables, a riding stable which has a permit issued by the Forest Service, to use as riding trails, a portion of the forest bordering the road and within the study area. There is some small growth timber harvesting, as well as fuelwood cutting, in this area which contributes to the fire safety of the city of Flagstaff, and which has proven of late to be of the utmost importance to the residents of this city which is completely surrounded by the largest stand of ponderosa pine forest in the world. All of these commercial ventures generate revenue for the Forest Service to use in maintenance of the forest ecosystem.

There also is quite a lot of private property within the boundaries of the study area. Access to and from these private holdings is of major concern to the residents of those areas.

Most, if not all, of these forest interface activities would cease if the massive study area were to be given over to the National Park Service to manage. It has been shown historically that the Park Service eventually stops all private and commercial activities within the park boundaries, including in some cases, fire suppression (re: the Yellowstone Fire a few years ago). If the forests cannot be cleaned out, and thinned out periodically of the thickets of closely spaced trees, and the undergrowth and dead/down timber trash which accumulates over time, we will be faced with more of the tragic crown fires which have decimated hundreds of thousands of acres of woodlands in just the last few fire seasons. To name a few: the Rodeo-Chediski Fire, the

~~Wallow Fire, which was only contained a few days ago and burned over 750,000 acres, the largest wildfire ever to burn in the state of Arizona. The~~

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I support the Walnut Canyon area of study to remain under the National Forest Service for the following reasons and comments:

☐ 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.

☐ 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. More than apparent adequate expansion already took place in 1996. 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. To force private property to fall within a national monument or park is simply unconscionable. This violates the very principles our country was founded on. Private property has not been respected within other park situations. The City water treatment plant should not be forced to fall under monument guidelines. My question would be: Were all private property owners notified of this 30,000 acre study? It appears that they were not all notified.

☐ 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. 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 an outrage.

☐ State and National parks have lacked funding to maintain their current infrastructure. 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. Beef producers are an asset for our state's economy.

☐ To 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.

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I have received notice about the Walnut Canyon meetings commencing May 23rd and look forward to talking with you again. I expect that you'll be busy, and so I bring up one item now.

Attached is a copy of page 7 of your summary of Study comments through August 2010. I have highlighted the portion about the National Conservation Area. A casual reader would, i think, get the impression that favorable and critical comments were pretty evenly balanced. The actual situation was radically different.

You provided public access to a database of all comments submitted during the first comment period, April through August 2010. I searched the database for comments about a "National Conservation Area" or an "NCA." Counting each organization of individual only once, I found the following tally.  
Positive comments: 18.  
Negative comments: 1.

No other land-use designation that could apply under contained management by the Forest Service came even close to the number of positive comments here.

I don't expect you to make as detailed a search as I did, but I hope you'll agree that more care needs to be taken in the future when characterizing the support for an NCA.

## Walnut Canyon Study Comments - May - July 2011

I submit comments on the preliminary management options described in your second newsletter.

### Genesis of the Study

A City-Council joint resolution of December 2002 requested a federal study of the land within the Walnut Canyon Study Area. I think it fair to summarize the resolution's 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.

Note the emphasis on protection against development in perpetuity. Beyond articulating the two goals, the resolution asked that the study identify the best way to achieve the goals.

I am mindful, of course, that the present Study responds to a Congressional act of 2009. In the bill, the emphasis on protection against development in perpetuity and the aim of finding the best route to goals have been lost. Consequently, my starting point remains the City-County resolution of 2002 because the resolution better expresses the community's goals.

### Inadequacy of the Standard in the Forest Plan

The Flagstaff community has reason to doubt the permanency of anything written as a Standard into the Forest Plan or promised by the Forest Supervisor. Here are two pieces of evidence.

In the period 1992-93, Fred Trevey, the Forest Supervisor, and Clyde Thompson, Peaks District Ranger, promised the Arizona Congressional delegation, the City Council, and the County Board of Supervisors that a Walnut Recreation Area would be established formally. Signs were even erected along some boundaries. When Trevey was replaced by another Supervisor, the new Supervisor dropped the plan.

In 1998, the Forest Service signed a Memorandum of Understanding designed to support the Flagstaff Area Open Spaces and Greenways Plan. Once again, a change in Forest Supervisor led to a de facto departure from the spirit of the MOU and the efficacy of the Plan. That shift—in January 2000—catapulted the Walnut Canyon issue to the prominence it has today.

I attended the scoping session for Walnut Canyon at Flagstaff City Hall and would like to add my comments. The Walnut Canyon area offers many scenic and biological and recreational values, which are well worth protecting through whatever agency is able to do so. This area could also be subject to development pressures by an ever-growing city. I would favor enhancing the protecting of this area by moving it from the jurisdiction of the forest service to the National Park Service, although I recognize the capabilities of the forest service to protect lands. I would also be in favor of designating this area as wilderness. Sincerely,



## Walnut Canyon Study Comments - May - July 2011

Please consider the following comments to the proposed management options resulting from the Coconino NF/Walnut Canyon NM Management Options Special Study.

I have a great deal of familiarity with the study area dating back to 1975. I worked as a wildlife biologist and wildlife conservation officer of Arizona Game and Fish Dept. assigned to the Flagstaff Office during the period 1975-99. During my career I witnessed the origin of this current study and commented on several proposals to enlarge WCNM. Some of these proposals were quite expansive compared to the one offered in this study. I truly hope this is the final time this area is "studied" as the cost of this process which began many years ago has been significant.

Based on my knowledge of the area, the current uses of the area, the role the Coconino National Forest (CNF) has played in management of the area, and other associated factors I strongly endorse continuation of management/jurisdiction by the CNF. Because of the Forest Service broad spectrum of management tools, I can foresee no reason to transfer this area to NPS jurisdiction. Furthermore this area does not meet criteria for transfer to or management by NPS.

If a higher and more focused level of protection is indicated (which I do not believe is needed at this time), then consideration could be given to asking Congress for National Conservation Area (NCA) status. If such status is granted or a higher level of protection is deemed necessary through the use of the CNF LMP, I request the following provisions be included in the management plan: continuation of mixed recreational/wildlife management activities to include: hunting, wildlife watching, hiking/biking, horseback riding, camping/ OHV use as accommodated by the CNF TRM, fuel wood gathering, wildlife management activities including aerial wildlife surveys, wildlife capture, wildlife research, water development construction and maintenance, water hauling to water developments, and vegetation management to include controlled burns and seeding. I also request the area not be excluded from timber management/harvest activities. Furthermore I request no additional use restrictions be placed on lands adjacent to the study area.

I support a provision to purchase or otherwise acquire sections 22, 28, and the eastern ½ of section 10. This could be accomplished by outright purchase resulting from a grant from Congress or the State. In addition, a land exchange between USFS and ASLD may be possible. Either of these actions would help protect the study area from development for perpetuity. The issue of future development of these ASLD parcels is real and deserves attention. It is probably the single most important component of the "study" and is probably the only component that deserved to be "studied". If such a purchase or exchange occurs I strongly endorse these lands being placed in CNF jurisdiction.

I urge the boundaries of the proposed study area be adjusted to exclude all private lands (except those located in Sec. 31) and City of Flagstaff owned lands.

In summary I strongly support acquisitions of the sections 22, 28 and the eastern ½ of section 10 and transfer of ownership to the CNF. I do not support any transfer of lands in the study area to NPS jurisdiction. These lands are entirely too valuable to Flagstaff residents and the Nation as sources of commodities and recreation to be transferred to NPS. WCNM was set aside to fulfill a need associated with the cliff dwellings and its enabling legislation did not set a mandate to annex other lands to support this intent. Multiple use lands such as those included in the study area are the source of wealth for our nation and we cannot afford to compromise any more wealth producing lands in order to "interpret"/protect WCNM. If creation of an NCA is deemed the best solution, I can support it if use provisions noted above are included in the management plan. And if creation of an NCA is selected, I strongly

## Walnut Canyon Study Comments - May - July 2011

I wish to make a point here I have made before to the Flagstaff City Council and County Board of Supervisors when this thing first began. The whole plot behind this effort by the group, "Friends of Walnut Canyon?", was to have the boundaries of Walnut Canyon expanded to 300,000 acres (originally) or whatever they want it to be now, to have an area around Walnut Canyon National Monument that they can "OWN" for their purposes (bird watching, hiking, etc.), and most importantly, to prevent any development for several miles around Walnut Canyon. As you consider the study area and what to do, I would urge you to remember a few things.

1. As I understand it, you can not create or expand a National Monument unless it is shown to protect and preserve resources essential to national interests. By the admission of the park supervisor, they know of no assets at present that qualify for a petition to expand the park. Believe me, I have been over more of that country more times than most of those city yuppies ever will and Ms. Chung is right. There is NOTHING of national interest to preserve as an expansion of the monument. It is nice country, but not National Park quality.

2. If the Walnut Canyon National Monument is expanded, some of the activities they want to protect will vanish for everyone. As it is now not only can you hike and bird watch, but you can also bicycle, hunt, camp, ride horseback, gather firewood, rock climb, etc. and a couple of ranchers have grazing rights that would be lost impacting their livelihoods. All of this would be lost.

3. This brings us to the main point of all this fuss, "DEVELOPMENT?". They don't want anything around the park plowed under and planted in houses and shopping centers. Oh gee, neither do I. But, I do not agree that the federal government has the right to butt into that issue. I feel that the place for that is in local government, i.e. the city council and county supervisors. However, they have successfully abdicated their responsibilities to the Feds so now it's left up to you to make the decisions. My thinking is this: you can make a declaration that development is off limits by establishing a conservation zone or green belt. That way the land is left useable in its present form and any close development in the area is halted. This may make you the "dirty dog" to the developers, but will preserve the area from what everybody fears the most.

4. As to what management the land is governed under, the Park Service apparently doesn't have any further stake in any more land area for the monument and does not have the funds to manage or maintain anything more. The Forest Service is doing a fine job with the portion around the park that they now oversee. Why mess that system up? It seems to be working just fine. As for the city and county portions of the study area, they didn't want to take control of it before now; so if you don't redraw the boundaries to exclude those areas, you can tell them how to deal with it and they will have to like it.

I hope this helps make a reasonable decision on how the area is affected for current and future generations.

I am writing to voice my support for the existing Walnut Canyon boundaries. The current network of biking trails has provided me with excellent outdoor opportunities for 20 years and my mountain biking pursuits could be severely limited by the proposed boundary changes. These trails should be available to ALL users and NOT be fee based in their use.

Please keep these areas free and accessible to ALL users.

## Walnut Canyon Study Comments - May - July 2011

My wife and I are retired entry-level mountain bike riders. We enjoy biking the trails around Flagstaff, especially Campbell Mesa. We appreciate the facilities and take pains to observe trail courtesy and rules of the trail. Mountain biking is an excellent exercise, both for our minds as well as our bodies. When we visit to ride, we also shop and eat at restaurants in Flagstaff.

Please keep the existing (and any new) trails open and free to mountain bikers.

Our family uses the Campbell Mesa trail system at least 3 times a week. We also use it to connect to the AZ trail in our area. We would like to see these areas to remain open to mountain biking, hiking etc.....

What every you decide I would like the use of mountain bikes to be able to be ridden on at least the trails we have, and on any new trails that are proposed. Mountain biking in this area is best in the spring and fall and with out it would be very limited in the Flagstaff area.

I enjoy using the existing trail systems in the Study Area for mountain biking and hiking. I would like for this area remain open for mountain biking and hiking access and feel that the designation of National Monument/Park would hinder such access. Thank you for the opportunity to comment.

I enjoy riding the trails at Campbell Mesa and the Fisher Point areas. It would be a shame if they were no longer available to cyclists. They are some of the best single track trails in all of Flagstaff. They are easy to get to and are not as difficult as the mountain single track trails. They are just plain fun. I hope they remain as they are. Thank you for your attention to these comments. Charlie

I support expansion of the protected zone around Walnut Canyon but it is important that access by mountain bikes continue.

Mountain biking on the trails on Campbell Mesa, the Arizona Trail on Walnut Canyon Rim, and the Flagstaff Loop Trail is important to me. I use these trail frequently and the loss of these trails would be a disappointment.

Protect the area surrounding Walnut Canyon from development but do not restrict usage by recreational users.

Thank you.

## Walnut Canyon Study Comments - May - July 2011

The Walnut Canyon area south and east of Flagstaff is a very wonderful place. I hope it's beauty can be maintained for all future generations to enjoy.

There are many trails into this canyon that are regularly used by people hiking, on mountain bikes, and on horse. These trails are easily accessible from downtown Flagstaff and NAU by way of the Arizona trail, from the CCC campus, and from neighborhoods along Lake Mary road. This area is also easily reached by people coming from the trails behind Little America hotel, and from neighborhoods in the Country Club area.

The view from on top of Fisher Point is really great. One can see all of the volcanic mountains around Flagstaff including Woody Mountain, A1 Mountain, and the San Francisco Peaks. And it's a great place to look into Walnut Canyon. The beauty inside the canyon is great too. There are sculpted cliffs of the Coconino Sandstone and several caves. There are many beautiful flowers, and one often sees deer and elk in this area. The uplift of Anderson Mesa from the fault zone along part of the canyon is easily viewed.

I hope this area can be protected and preserved, and that the many wonderful trails through this area can remain available for their traditional uses for hiking, mountain biking and horse riding.

Sincerely,  
Greg Ulrich

My wife and I appreciate riding the trails on Campbell Mesa, Walnut Canyon rim, and the adjacent areas. Thank you for your work on maintaining and improving them.

I want to let you know that mountain biking on the trails on Campbell Mesa, the Arizona Trail on Walnut Canyon Rim and the soon-to-be-built Flagstaff Loop Trail is important to you!!!!!!!!!!!!!!

Hello,

I am especially concerned about biking in this area. I have seen a tremendous increase in bikes on trails over the past decade and with this increase comes trail erosion and loss of quiet and solitude on the trails. I have also seen an enormous number of major, illegal trails being built on the national forest lands and I have huge concerns about this happening in the Walnut Canyon area. Please, please do not let this area be trashed by bikes as many areas currently are. For example, with the new loop trail, the small, intimate trails on Mars Hill that have not changed character in a decade have recently been "discovered" by bikes and are now hammered and eroded, and the character has changed immensely. I have hiked in the Walnut Canyon area for years and hope that whatever management is chosen, that there will be some limits on biking.

Thank you!!!

## Walnut Canyon Study Comments - May - July 2011

An undeveloped buffer zone of undisturbed land (minimum one mile from canyon rim) should be maintained between Walnut Canyon and any future development or land uses, all motorized vehicles should be prohibited in the buffer zone.

City of Flagstaff could consider a special zoning district for a "Village Development" with cars parked in lots peripheral to a village center that would contain both local retail and medium density housing. The "Village Center" could be midway between the existing Butler access at Wakonda St. and the new one mile buffer zone.

Village Center uses would emphasize local services, ie: smaller groceries, drugs stores, coffee shops, pub, workout and pool area, children's playground, central square, community gardens. The intention would be to create neighborhood services and uses...with perhaps a half-mile walk/bike ride from parking to discourage regional traffic to the shops/services.

Mountain biking on the trails on Campbell Mesa, the Arizona Trail on Walnut Canyon Rim and the soon-to-be-built Flagstaff Loop Trail are important to me.

Please keep equestrian trails open at Campbell Mesa, Arizona Trail at Walnut Canyon Rim, and to-be built Flagstaff Loop Trail. This is an area my family and friends use every week for riding. Thank you.

I live adjacent to the Walnut Canyon Study Area and use this area for recreating several times each week through out the year. Mountain biking is my main form of use. It is important to me and other users that access to this entire area not be inhibited, or limited for mountain biking. Thank you.

I would like equestrian access to all areas. Access includes trails and parking areas for trucks and trailers.

I feel that access for horse back riding on the trails on Campbell Mesa, the Arizona Trail on Walnut Canyon Rim, and the soon-to-be-built Flagstaff Loop Trail located in the study area are important to me and the hundreds of horse back riders residing in the Walnut Canyon vicinity; plus the hundreds of equine recreationists that visit Flagstaff each year.

I think Walnut Canyon monument is large enough; should be managed by the USFS and should allow recreation of all types in the surrounding National Forest.

I am opposed to annexation of the study area by the Walnut Canyon National Monument and opposed to NPS managing the area in any way.

I am in favor of the USFS maintaining management of the area and retaining the current usage including recreational use of firearms, hunting, and grazing.

The Walnut Canyon trail system is my backyard. I use it almost daily for running, hiking and biking. I am so thankful that I live so close to this wonderful area. I would love to help keep it just as it is. I would be willing to volunteer to keep this area beautiful.

## Walnut Canyon Study Comments - May - July 2011

Just love the multi use trails in the Walnut canyon area use them at least once a week...please keep them open to the public.

Biking in the Campbell Mesa area is important to me and my family. When I have family in town and they would like to bike on a beginner trail, campbell mesa is the best option around. Additionally, I feel it is important to maintain bike access to the Arizona Trail and the soon to be completed portions of the Flagstaff Loop Trail in the Walnut Canyon area.

I am a life-long hiker, cyclist, outdoor enthusiast and naturalist. I strongly urge that any possible expansion of the Walnut park boundaries not preclude mountain biking access to areas where it is now allowed, ie. Campbell Mesa, the AZ Trail, and on the soon completed Flagstaff Loop Trail.

I believe there is a discrepancy in Park policy which bars mt biking from many trails where horses and people are allowed. Horses by far have a much greater negative effect on trail erosion and introduction of invasive species, yet are allowed in many fragile areas and in Parks. Many here in Flagstaff believe mt bikes can be accomodated on the trail systems along with other NON-motorized trail use. I disagree strongly with allowing any sort of motorized recreational vehicles (motorcycles, quads, ski mobiles and the like) on many forest service and park lands where their destructive effects are well established. On the other hand, there is scientific evidence that responsible mountain biking (the majority that is) is less destructive than horseback traffic and even pedestrians as they are less likely to leave the trail.

Mountain biking is a silent, peaceful, low-carbon emission or consumption, minimally erosive and non-intrusive way to access trails. They have a history and presence in Northern Arizona that should not be eliminated. And as a local cycle-industry worker, they are also an important draw to the greater Flagstaff natural area which helps build Flagstaff's economic base in a "green" direction.

Thank you, Susan Hueftle

Mountain biking on the Arizona Trail, Campbell Mesa Trails and Flagstaff Loop Trail in the Walnut Canyon area is important to me and the mountain biking community of Flagstaff. Please ensure that access to the trails will remain and that maintenance of the trails continues as part of the long term management plan of Walnut Canyon.

I would like mountain biking to stay at Campbell Mesa and Walnut Canyon. It is a great way to introduce people to staying active through cycling in an outdoor setting. The area is beautiful and should stay open to cyclists.

I really think the areas around Walnut Canyon are important mountain biking trails. I also think expanding the monument reduces access for other users by increasing the regulation. please don't screw up our ACCESS.

I wish to register a strong preference for National Conservation designation for the Walnut Canyon area in question.

A decision that will protect our superb recreational bicycling opportunities is of major importance. Flagstaff's hard won system of trails is widely recognized as a unique community asset.

Even an 81-year-old grandmother (with an excellent bike) can enjoy safe, close to home riding for a few more years, and most of our community will make use of easy access to the trails for decades to come.

## Walnut Canyon Study Comments - May - July 2011

Mountain biking is a solid addition to Flagstaff's economy and it's social environment. Northern Arizona is filled with amazing places to engage in this activity as well as protecting some of our more fragile areas from it. Although it is not a destructive sport ecologically when practiced on approved and appropriate trails it often seems to be a group that fills only a minority niche in decision making and thus people who are not conscientious may create unintended "trails" in order to retain a certain amount of territory that they may use for this really enjoyable past time. If we have more trails that are designated as appropriate for biking and more awareness about this subject promulgated by various sources I believe it can only benefit our landscape plans here in northern AZ.

Walnut Canyon National Monument's current boundaries are well defined and overly adequate to protect its areas of special interest. Its cliff dwellings and the entire canyon are certainly worthy of its classification. Its boundaries extend in all directions well beyond both of these attractions. Increasing the size of the Monument will not increase the number of visitors or the interest in the general area.

We have lived in the nearest house to the west boundary of Walnut Canyon National Monument for over 33 years and knowing the many barriers to development already in place, see no need for changing the barriers or increasing the size of an already adequate boundary. The existing barriers to development are both geographically and governmentally imposed, being under federal and state ownership with almost all the private lands being within the City of Flagstaff's jurisdiction and under an ever stricter zoning code.

I am aware of the extreme pressure on our officials from a local "special interest " group and am appalled that such a small group has caused so much time and money to be expended on something that needs no changes whatsoever. The best way to preserve the current and non-detrimental uses within this study area is to leave it alone. The various governmental agencies now in charge have done a good job and have working relationships with each other of longstanding that comes from understanding and respect for Walnut Canyon.

Thank you for the opportunity to share my opinion.

This study is important to me because our home and property is almost completely surrounded by the study boundary. We have lived there for 33 years, so I feel my opinion has some weight.

I have several concerns. The first is the sheer size of the area in the Study. The proposal to make it all an addition to Walnut Canyon National Monument seems, frankly, a ludicrous idea. The proposed expansion certainly does not meet the "National Significance" nor the "Suitability and Feasibility" criteria for National Park lands.

It is extremely important to me that access and the current uses of the area continue to be permitted. These include wildlife watching, hiking, bicycling, horseback riding, archery hunting and many others. Also, the importance of controlled burns by the Forest Service is being shown with every crown fire Arizona has experienced and this should be continued in Flagstaff's proximity.

I think we, the taxpayers, have spent way too much looking for a fix that wasn't needed. However, I can see the necessity of bringing a solution and finality to this issue so it doesn't come up again every few years. I would support a National Conservation Area designation, administered by the Forest Service. The boundary lines would need to be worked out between the various government entities involved, but certainly much reduced from the Study area. An NCA administrated by the Forest Service could be structured to allow the current uses in the area and still protect it from development, sale or exchange.

Thank you for your work on the issue.

## Walnut Canyon Study Comments - May - July 2011

Mountain biking on the Arizona Trail, Campbell Mesa Trails and Flagstaff Loop Trail in the Walnut Canyon area is very important me. Thank you!

Just wanted to let you know that my wife and I really enjoy riding our mountain bikes in the Walnut Canyon area and do not believe that there are any significant negative impacts when trails are designed and maintained correctly. I also do not believe that a "pay to play" fee system would be an efficient way to manage the area as these types of systems typically bring in more management overhead costs and only a small portion of the money seems to be used for things that actually benefit the forest or the money gets swept out of the fund to cover some shortfall in the state or federal budgets.

Thanks for taking the time to read this!



## Walnut Canyon Study Comments - May - July 2011

RE: Walnut Canyon Study Area Special Study

DATE: July 1, 2011

To Whom It May Concern,

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.

## Walnut Canyon Study Comments - May - July 2011

I am writing to express my support for increasing the protection of lands included in the Walnut Canyon Study Area. I am concerned about the impact of motorized vehicles and unofficial roads. Many of these unofficial roads are nothing more than ugly ruts and mud holes. Without more personnel to provide prevention of off-roading in the area, it seems leaving much of the area as National Forest will only continue the current situation. Designation as a special management area might be better.

I would like to see the area to continue to be available to non-motorized activities such as mountain biking, hiking, horse-back riding and hunting. I think the area around Walnut Canyon is an important recreational area near Flagstaff and should be available for low impact activities. It would be nice to protect much of the area from development and preserve it as wildlife habit and open space for recreation.

## Walnut Canyon Study Comments - May - July 2011

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 recreation 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. We submitted comments during the first call for input on the Walnut Canyon Special Study Area, and we stand by all of that input. We would like to emphasize our continued concern with certain possibilities presented for management of this area.

Bicycling Access must be maintained, and improvements for bicycling should be allowed in the future.

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. 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 yet to be constructed FUTS and the Flagstaff Loop Trail. Certain designations could create insurmountable barriers to this.

### Difficulties with Park Service management

We have strong concerns with the designation of any of these lands as National Monument or National Park. 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, however these changes are not currently in place, and are still significantly more restrictive than the management options available under US Forest Service policy. We ask that the final Study recognize and discuss any administrative and/or legislative difficulties for bicycle access that might be created by Park Service, or other, management options presented by the study.

### 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 flexibility 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 the 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,

## Walnut Canyon Study Comments - May - July 2011

I have the Cosnino grazing allotment and this park expansion project would affect me and my business negatively. The last time the park expanded, a portion of our grazing allotment was taken and my cattle were fenced out. This directly affected the amount of grass my cattle had access to. If this proposed expansion takes place, it will cut my access to the water lines and storage tank that my grandfather Bill Wells personally financed the construction of, and with which I use to water my cattle. My fear is that despite promises otherwise, I would inevitably not be allowed to run cattle there, which would mean the end of this forrest allotment. This would obviously dramatically impact my income and ability to make a living. For the good of the public, who would have to start paying for access, and other ranchers like myself, I strongly feel that this entire study area should remain under the management of the United States Forrest Service.

Thanks for the chance to comment on the Walnut Canyon Study Area. I favor option 2 or 3 for enhanced protection for the special lands which surround the current boundaries of Walnut Canyon National Monument. The recent example of the Az Game and Fish Dept arrogantly creating a shooting range near the southeast boundary of the national monument should remind all of us how vulnerable this area is to inappropriate development. (From this time forward the sound of gunfire will be part of every visit to the national monument and nearby forest service land.)

The Walnut Canyon Area is very appreciated natural recreation resource for Arizona. The access and usage are important for the people here. It is a very well preserved place. I very rarely see any vandalizm or trash there. I have lived right by the Canyon for many years. My son and granddaughter now use it. I have ridden my horses down there for many years. Please do not recomend to restrict usage. In the future the parking may need to be managed but for now it must remain accessible. Catherine Tolstoy

I support the prevention of land trades of public lands within the Walnut Canyon Study area. This area needs to be preseved from encroachment by urban development and other uses that will detract from the prestine nature of the area. It is my hope that the contractor hired to conduct this study carries on a intensive investigation of the naturea resources and dynamic ecosystems at play within the 30,000 acres study area. An impact analysis should be included as part of the study with an emphases on sustainable wildlife corridors.

Thanks for this opprotunity to comment.

## Walnut Canyon Study Comments - May - July 2011

If expansion of the Walnut Canyon Park will close off more land to grazing and the public, I do not support it. According to sources, the following are several reasons to oppose the transfer of the studied lands to the Park Service;

1. The National Forest Service role is adequate.
2. Further expansion is unnecessary , as the original park plus the 1996 expansion created sufficient protection for the canyon and its cultural resources.
3. There are no defensible grounds for eminent domain or restriction to privately own property.
4. Due to the lack of funding experienced by governmental agencies, more restrictive management of public lands is not financially feasible.
5. Restriction of lands within reach of the recreational public is not supported by that public. More activity by a public suffering from lack of exercise should be encouraged, not denied.
6. Cattle are an efficient way to transfer delivery of solar energy for the nutritional needs of the public with very little use of fossil fuels. The possibility of termination or restriction of grazing permits is eliminates a realistically ecological solution to sustaining our population, without excessive use of fuels and fertilizers derived from nonrenewable sources.

## Walnut Canyon Study Comments - May - July 2011

HDR/e2M

Attention: Walnut Canyon Study Area Special Study

9563 South Kingston Court. Suite 200

Englewood, CO 80112

RE: 30,000 acre study for proposed expansion of Walnut Canyon National Park

If expansion of the Walnut Canyon Park will close off more land to grazing and the public, I do not support it. According to sources, the following are several reasons to oppose the transfer of the studied lands to the Park Service;

1. The National Forest Service role is adequate.
2. Further expansion is unnecessary , as the original park plus the 1996 expansion created sufficient protection for the canyon and its cultural resources.
3. There are no defensible grounds for eminent domain or restriction to privately own property.
4. Due to the lack of funding experienced by governmental agencies, more restrictive management of public lands is not financially feasible.
5. Restriction of lands within reach of the recreational public is not supported by that public. More activity by a public suffering from lack of exercise should be encouraged, not denied.
6. Cattle are an efficient way to transfer delivery of solar energy for the nutritional needs of the public with very little use of fossil fuels. The possibility of termination or restriction of grazing permits is eliminates a realistically ecological solution to sustaining our population, without excessive use of fuels and fertilizers derived from nonrenewable sources.

## Walnut Canyon Study Comments - May - July 2011

HDR/e2M

Attention: Walnut Canyon Study Area Special Study

9563 South Kingston Court. Suite 200

Englewood, CO 80112

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7. We need more land in production to continue feeding this countries population, not less.

Regulations being proposed by the Forest Service impinge on the Walnut Canyon Study. Specifically there must be

No snowmobiles in the study area

No windfarms/solarfarms in the area

No off road vehicles in the study area

No hunting in the study area.

The whole point of the study is to find ways to preserve and protect the values in the study area. The four listed above clearly violate those values.

## Walnut Canyon Study Comments - May - July 2011

Contrary to popular believe I feel developed off road trails for vehicles and some hunting should be allowed. Same for snow mobiles. Also I am still in favor of a designated area for shooting. I am NOT a shooting nut or dirt biker. But I feel if we give designated trails and places for these activities I can be free to walk the trails in safety and peace. No mining should be in any area! solar farms and wind farms need to be considered and looked at.

thanks

cc

To the Walnut Study Group,

Thank you again for giving the public the opportunity to comment on ways to manage the lands surrounding Walnut Canyon. In our past comments, Friends of Flagstaff's Future has stated our view that the management goal for this area should be to protect, in particular, the cultural and historic resources within the existing park boundaries and those found outside of the park boundary. We have reviewed the document from April 2011 and many of our members attended the open houses where the study groups proposed options were discussed. We were disappointed that at the time of the open houses the inventory of the cultural and historic resources within the study area but outside of the park boundary still had not been completed. In addition there was very little information on endangered species in the area and threats to wildlife.

While the public still does not know the cultural and historic significance of the lands within the study area, it seems clear to us that there are many threats to the existing Monument that would require greater protection of these lands than currently exists. Our primary concern, which we have stated in past comments, is development within the State Trust lands, and possible future trades of U.S. Forest Service lands. Development close to the Monument could have a severe impact on Walnut Canyon. This could include loose dogs wandering the monument from adjacent communities, litter, more invasive species, noise, pollution, off road vehicle use just to name a few. We were told at the meetings and in your documents that currently the U.S. Forest Service has the strongest policy it can have to prevent land exchanges in the study area. This policy has obviously been enacted due to pressures from the environmental community supported by the City of Flagstaff and Coconino County governments. It is very possible in the future that pressures from the development community and political changes in government could reverse this stand and put pressure on the Forest Service to exchange lands. In addition the Forest Service has no commitment to protect these lands from road development in the study area, which could be a threat in the future as the city looks for alternatives to reduce traffic congestion.

In the past year we have seen the approval of a shooting range by the Arizona Game and Fish Department within earshot of the monument. Who can predict what future threats there will be to the monument by entities that don't care about its preservation and protection. We urge you to work with the stakeholders to come up with a boundary and designation proposal for the Monument and study area that will protect it from these threats.

Yours truly,

Marilyn Weissman

Friends of Flagstaff's Future



## Walnut Canyon Study Comments - May - July 2011

ATTN: Walnut Canyon Study Area Special Study  
9563 South Kingston Court, Suite 200  
Englewood, CO 80112

Dear Superintendent Chung and Supervisor Stewart:

The Sierra Club appreciates the opportunity to make recommendations on the Walnut Canyon Study Area. The Sierra Club is America's oldest, largest, and most influential grassroots environmental organization. Inspired by nature, the Sierra Club's more than 750,000 members – including over 12,000 in Arizona as part of the Grand Canyon Chapter – work together to protect our communities and the planet. The Sierra Club's

for artifacts, (as evidenced by recent criminal cases in southern Utah), adds urgency. Also, we anticipate increased visitation, vehicular use, and camping impacts to accompany the Northern Arizona Shooting Range proposed for Foster Ranch, one-quarter mile from the Study Area Boundary and one-half mile from Cherry Canyon. We request prompt action to protect nationally significant resources outside of the monument's current southeast boundary from impacts associated with increased recreation near Foster Ranch. If these areas are deemed appropriate for a national monument expansion, action to designate and protect the area should proceed as quickly as possible.

Ecological protection is part of Walnut Canyon National Monument's purpose, and should be considered when analyzing boundary adjustments. The Park Mission in the Walnut Canyon Final Environmental Impact Statement General Management Plan (2007) includes the following as creating park significance for Walnut Canyon:

☐ The natural and cultural resources within the monument are known to be significant to contemporary native tribes, as evidenced by oral history, continuing practices, and the archeological record.

☐ 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 includes a high~~  
b. Breeding-season restrictions should be considered if noise levels are estimated to exceed 69 dBA (A-weighted noise level) (~80 dBO [owl-weighted noise level, Delaney et al. 1999a]) 290 consistently (i.e., >twice/hour) or for an extended period of time (>1 hr) within 50 m (165 ft) of nesting sites (if known) or within entire PAC if nesting sites are not known.

### 11. Climate Change

#### A. Mitigation Strategies

a. Reduce Non-climate Stressors. Reduce or remove other non-climate stressors, including: scientific exploitation, noise disturbance, recreation disturbance, negative effects from grazing,

☐ Included in Final Draft of City of Flagstaff Open Space Element for Flagstaff Regional Plan as "Priority open lands" (City of Flagstaff 2011a, p. 10)

☐ USFS Coconino National Forest Order No. 04-150: Motorized Vehicle Restrictions Fay Canyon – Fisher Point – Skunk Canyon – Walnut Canyon (USFS 1992): The sensitivity of the western part of the Study Area was recognized in this 1992 order.

## Walnut Canyon Study Comments - May - July 2011

While we want to emphasize that current non-motorized uses are not placing undue stress on most of the resources within the Study Area, the high value of cultural, hydrologic, and ecologic resources in the area could be damaged if conservation and/or preservation are not the most important management components of any new designation. Also, negative wildlife/human interactions can occur if we add more human traffic to an area that supports large animals like mountain lions, bear, and elk. Therefore, Sierra Club opposes a designation that prioritizes recreational uses above conservation. Sierra Club considers a designation such as National Conservation Area as appropriate for most or all of the Study Area and with appropriate protections in place for resources.

Wilderness potential within Study Area

The Wilderness Act of 1964 (Public Law 88-577 (16 U.S.C. 1131-1136)) allows certain parcels to be administered for the use and enjoyment of the American people in such manner as will leave ~~them unimpaired for future use as wilderness, and so as to provide for the protection of these~~

Comments:

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6. Cattle are an efficient way to transfer delivery of solar energy for the nutritional needs of the public with very little use of fossil fuels. The possibility of termination or restriction of grazing permits eliminates a realistically ecological solution to sustaining our population, without excessive use of fuels and fertilizers derived from nonrenewable sources.

\*\*\*Conservation should come first. This area should be designated as a National Conservation Area or Wildlife Preserve, not a National Recreation Area.  
?

\*\*\*Please make a fully informed assay of Walnut Canyon by visiting the area.

\*\*\*Please understand that large core habitats and wild places are becoming increasingly rare.

\*\*\*It is MUCH easier to protect a place such as this than to piece it back together after fragmentation by land trades and destructive uses.

\*\*\*I am like millions of others: I value quiet recreation and have respect for the wildlife that relies on these lands for refuge from roads and noise.

\*\*\*\*These lands should be protected from land trades. No one can replace what can be learned, appreciated, and gained from preserving this area as it exists now, without further exploitation.

\*\*\*Visitation should be kept to manageable levels.

## Walnut Canyon Study Comments - May - July 2011

The 30,000 acre landscape of the Walnut Canyon Study Area is a important and unusual area of contiguous natural landscape that should preserved from the dangers of being chopped up by land exchanges or bisected by new roads or utility expansion or degraded by expansion of motorized recreation such as ORV.

I favor accomplishing this with a special designation, such as National Conservation Area with management left with the Coconino National Forest. The management emphasis should be on preserving the natural character of the forests and canyons while allowing access by the public but managing access for resource protection including the wild and quiet character that now exists in most of the Study Area.

Another possible special mission for this area, would be as the Ponderosa Forest National Conservation Area. The idea would be to establish an area especially dedicated to research and public education on the Southwest ponderosa pine ecosystem. It could become a demonstration area for efforts to restore ecological balance in the heart of the largest ponderosa pine forest in the country. The goal would be a National Conservation Area dedicated to managing for long term ecological restoration of the Southwest Ponderosa Pine forest and equally important, an area to demonstrate and explain to the public, what long term efforts are being conducted across the southwest forests to achieve a healthier ecosystem.

The location of the W.C.S.A. near NAU with it's forestry program and Ecological Restoration Institute and the USFS Rocky Mountain Research Station make it a convenient location for public education programs and research projects of forest ecological restoration.

## Walnut Canyon Study Comments - May - July 2011

Public comments by Liz Boussard  
July 31, 2011

Management by the National Park Service (NPS) is the only means by which the goals of the study will be met. I favor an expansion of Walnut Canyon National Monument to the entire study area as well as Section 20 northwest of the current monument. I urge the secretaries of Interior and Agriculture to urge the National Park Service and the President to pursue either a congressional expansion or if necessary, a presidential proclamation through the authority of the Antiquities Act.

I object to closing the comment period prior to the completion of eligibility studies by the NPS. I spoke with the NPS study representative for planning in Denver and he explained that the cultural resources survey was an extensive document (~431 pp.) with a plethora of artifact documentation that although completed by the contractor, still required peer review that would most likely be incomplete by today (July 31st).

Although neither the National Park Service nor the U.S. Forest Service (USFS) will make recommendations in the final study submitted to their respective secretaries, the results of both the natural and cultural surveys should be complete and available to the public within a public comment period.

I will have more extensive comments on the draft of the study when released, but would add that my rationale for greatly preferring NPS management to USFS is based on a variety of examples in which the forest service has often failed to meet and uphold the obligations of its general management authorities, let alone special designations. Two local examples are the Theodore Roosevelt National Game Preserve and the Kaibab Squirrel National Natural Landmark, both on the North Kaibab ranger district of the nearby Kaibab National Forest. The influence of these designations has been historically and decidedly absent from the forest's management and planning duties.

The interpretation and implementation of any special administrative or legislative designation on any national forest is subject to the political or personal whims of a forest supervisor, regional ranger or chief of the forest service -- much more so than an established designation of a national park or monument. Uniform servicewide NPS policies as well as the individual authorizing legislation or presidential proclamation more specifically bind these designations.

As a very concerned citizen, I look forward to any and all information available to the public regarding the Walnut Canyon Study now and in the future.

Thank you,  
Liz Boussard

## Walnut Canyon Study Comments - May - July 2011

I am writing to express my support for increasing the protection of lands included in the Walnut Canyon Study Area. I am concerned about the impact of motorized vehicles and unofficial roads as well as the possibility of checkerboard development on state lands within the Study Area. The Walnut Canyon area of Flagstaff is a unique natural and cultural feature that deserves more protection than what I have observed. I have ridden my bike through many parts of the Study Area, and many of the official and unofficial roads are nothing more than ugly ruts and mud holes. Also, there are State Trust Lands very close to the current boundaries of Walnut Canyon National Monument. It would be a shame to see development right at the monument boundary, so having a long range plan for trading or buying those parcels is a wise strategy.

I do think that the management options provide an adequate range. I have concerns about management under the National Park Service because I like to ride my bike on the Arizona Trail and other trails and forest roads that wind through this area. There are not many access points to the Arizona Trail through this area, making bike riding one of the best ways to experience what this area has to offer. One can ride from Campbell Mesa to Fisher Point in an hour or two and enjoy the views from the canyon rim. As a mother of three with limited time, being able to quickly get into the backcountry is a wonderful advantage of this area.

I also have concerns about management under the US Forest Service because of the damage done by motorized vehicles under current management practices. There does not seem to be much effort to control this destructiveness. Designation as a special management area might be better if it means limiting motorized vehicles access (or at least keeping motorized vehicles on established roads).

I would like to see the area continue to be available to non-motorized activities such as mountain biking, hiking, horseback riding and hunting. The Study Area is an important recreational area near Flagstaff and should be available for low impact activities.

Having an overall management plan for the area is a better strategy than trying to make piecemeal decisions. When there is a plan, development & land exchanges are done more efficiently, exorbitant amounts of money don't have to be spent to rectify problems, and one landowner isn't pitted against another.

## Walnut Canyon Study Comments - May - July 2011

HDR/e2M

Attention: Walnut Canyon Study Area Special Study

9563 South Kingston Court, Suite 200

Englewood, CO 80112

August 1, 2011

Re: 30,000 acre study for proposed expansion of Walnut Canyon National Park

To Whom it may concern:

The Arizona Farm Bureau supports the continued management of the Walnut Canyon Study Area by the U.S. Forest Service under the Coconino National Forest. Of the options outlined in the special study issued in April of 2011, we believe the Forest Service is the most logical choice for the continued management of the Walnut Canyon Study Area.

The Forest Service currently manages the majority of the lands within the study area and would be able to maintain more flexibility for multiple use and necessary management projects. Additionally, we believe the U.S. Forest Service has the infrastructure as well as the technical and scientific expertise in place to protect and manage forest and rangeland.

We also do not believe the 30,000 acre area qualifies for a national park or monument designation. The National Parks Service management policy 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. We believe management and preservation of the natural and cultural resources already exists under U.S. Forest Service management and should remain under their care.

Another serious concern we have with the alternative choices is the fact that declaring this area a national park or monument will impact the ranching community whose livelihoods depend upon the grazing permits currently issued on the forest and encumber of private land within the study area. Our organization is committed to protecting private property rights and therefore opposes any private land being encumbered by the designation of a national monument or park. In addition, we believe any action that would restrict grazing or other uses of this public land would be an injustice to the community. No one questions the beauty of Walnut Canyon. Its sustained attractiveness to all types of recreationalists such as campers, hikers bikers, rock climbers etc. is a testament to the effective and sustained management by the U.S. Forest Service. We would encourage you to consider the continued management of Walnut Canyon by the U.S. Forest Service.

Sincerely,

Joe Sigg

Arizona Farm Bureau Federation

## Walnut Canyon Study Comments - May - July 2011

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.

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](mailto: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

Thank you,

Aszita Mansor

ADOT Roadway Predesign Section

## Walnut Canyon Study Comments - May - July 2011

The following are questions that the Friends of Walnut Canyon would like to ask the Study Team:

It is very difficult for the Friends to comment without knowing what has been done as far as resource study. Have the archeological resources on Campbell Mesa been studied? Has the impact of nearly 10,000 new residents closer to the Canyon than ever before been considered? How about the projected future population of Flagstaff rising to 150,000? This was considered a "given" at the Regional Plan charrettes last week.

Has the possibility of including AZ State Trust Sections 22 and 28 as NPS inholdings been discussed? If they are acquired somehow by someone using the API or other means, they could be given to the NPS without another act of Congress. The latest Study Newsletter inferred that the NPS could not accept these lands as gifts, but it did not mention this option.

Have the AZ State Sections even been studied for archeological significance? I understand that they have not. How can they be considered for inclusion in ANY designation if no one knows what is there? The City/ County resolution clearly included these sections in their desire for land to be studied and preserved in perpetuity.

Has there been any consideration given to the findings of the Open Spaces and Greenways plan?

Has the Study Group considered the results of the public opinion poll done by the Social Research Laboratory of NAU at the request of Coconino County between August 6 and 8 2002?

Further comments on the Study:

Changing the enabling legislation

Something which has not been discussed at the study meetings is that the "enabling legislation" for Walnut Canyon National Monument can be changed to include other missions than it does now. In fact it would have to be done to include the many other nationally significant features that would be included in a national park. This also was the plan of the Flagstaff Area Superintendent in 2002. With the enabling act changed, such things as recreation could be legitimately included in the mission of the existing unit.

The second newsletter does not mention this. In fact, it implies that only the existing enabling legislation is possible for managing the Monument.

~~Expansion for Management Reasons~~



## Walnut Canyon Study Comments - May - July 2011

Thank you for the opportunity to comment on the Joint City/County resolution and Congressional direction that directs evaluation of the Walnut Canyon Study Area for the proper designation(s) that will legislatively ensure protections and uses into perpetuity.

### National significance and park purpose:

The Walnut Canyon National Monument General Management Plan (GMP) mentions "that the Monument mission was established to preserve the prehistoric ruins of ancient cliff dwellings. These dwellings of prehistoric Puebloan habitations are found in Walnut Canyon's "island" topography. The national significance of these dwellings is that they include the only cliff dwelling architecture of the Northern Sinagua culture." These dwellings, though representing architecture, are an isolated resource of a stand alone entity that does not cover the entire cultural resources. Sometimes a park's legislative or proclamation history may not provide complete understanding as to why the park was established. To fully fulfill the national significance of the dwellings in a cultural setting, the entire Walnut Canyon ecosystem and surrounding environs need to be added to the "story". In fact, the Monument's GMP states that "within Walnut Canyon, ecological communities overlap to form ecotones, bringing together species usually separated by elevation, and creating a rare compression of floral/fauna zones. The biodiversity supported by these habitats includes a high concentration of sensitive species and is thought to have contributed to the decision of prehistoric people to settle here." This further strengthens the fact that the canyon, in associated with the ruins, are part of the national significance of the entire area. Also, as mentioned, the ecotones are representative of a rare resource compression, which also adds to its significance. Another area of the GMP talks about "cultural and natural resources within the Monument are known to be significant to contemporary native tribes, as evidenced by oral history, continuing practices, and the archeological record." Of course this significance wouldn't only include those areas inside the existing monument, but also the surrounding environs. In fact, the GMP mentions that 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. In defining park purposes, consideration also should be given to how the National Park Service is interpreting and implementing the definition of park purposes through the park's GMP. And finally, the GMP states that Walnut Canyon National Monument was established to preserve "prehistoric ruins of ancient cliff dwellings...that are of great ethnologic, scientific, and educational interest...with as much land as may be necessary for the proper protection thereof." National Park Service protection of just the "ruins" is only one isolated part of the national significance of the whole Northern Sinagua archeological landscape. There is enough significant mention in the Monument's GMP that park personnel consider areas outside the Monument as essential in contributing to the park's purpose.

### Boundary adjustment addressing omitted critical resources:

One of the criteria for a boundary adjustment addresses critical resources that are integral to an existing park unit. Resources that were omitted from an original park boundary inadvertently due to limited data and/or lines being drawn for mapping convenience rather than to correspond to resources are justification for a boundary adjustment. As discussed in the preceeding paragraph, there is much to the Northern Sinagua cultural landscape that has been omitted for one reason or another. In considering boundary adjustments the addition does not have to meet the same level of national significance as the original enabling legislation or proclamation. However, it does have to have a substantial relationship to resources within the park and should enhance or elaborate on those resources. The omitted cultural landscape resources do not duplicate those in the park and would be a significant and important addition to the existing monument. Included in this addition should be the entire watershed, which critically contributes to the uniqueness of the canyon proper, and thereby its relationship to the intent of establishing the existing monument in the first place.

## Walnut Canyon Study Comments - May - July 2011

This letter is in response to your correspondence dated July 28, 2011, regarding the National Park Service, Flagstaff Area Monuments and the 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 archeological sites and we consider the prehistoric archeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the Monuments' and 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 Coconino National Forest that surround 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 reviewed the enclosed newsletter regarding 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.

Our past experiences have resulted in unresolved conflicts with both the National Park Service and United States Forest Service management of the Flagstaff Area National Monuments and the Coconino National Forest. And therefore, we accept your invitation to arrange separate meetings with us to discuss the Study.