

Walnut Canyon Special Study

Under
Omnibus Public Land Management Act of 2009 (Public Law 111-11)



APPENDIXES

Prepared By:

Department of the Interior, National Park Service
Flagstaff Area National Monuments
and
Department of Agriculture, U.S. Forest Service
Coconino National Forest
Under Interagency Agreement (10-1A-11030411-014)
and
City of Flagstaff and Coconino County, Arizona

Final: January 2014



APPENDIXES

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APPENDIX A:
PUBLIC LAW 111-11, SUBTITLE C – SPECIAL RESOURCE STUDIES,
SEC. 7201. WALNUT CANYON STUDY

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[111th Congress Public Law 11]
[From the U.S. Government Printing Office]

[[Page 123 STAT. 991]]

Public Law 111-11
111th Congress

Subtitle C--Special Resource Studies

SEC. 7201. WALNUT CANYON STUDY.

(a) Definitions.--In this section:

(1) Map.--The term ``map'' means the map entitled ``Walnut Canyon Proposed Study Area'' and dated July 17, 2007.

(2) Secretaries.--The term ``Secretaries'' means the Secretary of the Interior and the Secretary of Agriculture, acting jointly.

(3) Study area.--The term ``study area'' means the area identified on the map as the ``Walnut Canyon Proposed Study Area''.

(b) Study.--

(1) In general.--The Secretaries shall conduct a study of the study area to assess--

(A) the suitability and feasibility of designating all or part of the study area as an addition to Walnut Canyon National Monument, in accordance with section 8(c) of Public Law 91-383 (16 U.S.C. 1a-5(c));

(B) continued management of the study area by the Forest Service; or

(C) any other designation or management option that would provide for--

(i) protection of resources within the study area; and

(ii) continued access to, and use of, the study area by the public.

(2) <<NOTE: Public comment.>> Consultation.--The Secretaries shall provide for public comment in the preparation of the study, including consultation with appropriate Federal, State, and local governmental entities.

(3) Report.--Not later than 18 months after the date on which funds are made available to carry out this section, the Secretaries shall submit to the Committee on Energy and Natural Resources of the Senate and the Committee on Natural Resources of the House of Representatives a report that describes--

(A) the results of the study; and

(B) any recommendations of the Secretaries.

(4) Authorization of appropriations.--There are authorized to be appropriated such sums as are necessary to carry out this section.

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APPENDIX B: ACRONYMS AND ABBREVIATIONS

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ACRONYMS AND ABBREVIATIONS

AGFD	Arizona Game and Fish Department
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
cm	centimeter
°F	Degrees Fahrenheit
FLEA	Flagstaff / Lake Mary Ecosystem Analysis
FUTS	Flagstaff Urban Trails System
FY	fiscal year
GMP	General Management Plan
HUC	hydrologic unit code
m	meter
MA 37	Management Area 37
msl	mean sea level
NCA	National Conservation Area
NEPA	National Environmental Preservation Act
NFMA	National Forest Management Act
NPS	National Park Service
RNA	Research Natural Area
RRPA	Renewable Resources Planning Act
USC	United States Code
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

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**APPENDIX C: CONCLUSIONS FROM AN ASSESSMENT
OF THE NATIONAL SIGNIFICANCE OF CULTURAL RESOURCES FOR
THE WALNUT CANYON SPECIAL RESOURCE STUDY,
TED NEFF ET AL.**

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Chapter 7: National Significance Assessment of Cultural Resources Properties in the Study Area

The assessment consists of identifying any properties in the study area that are individually nationally significant or identifying a group or cluster of properties that collectively is nationally significant. Regarding this task, due to the temporal affiliation of the vast majority of cultural resource properties in the study area, the focus is generally narrowed to the prehistoric ceramic era. The focus of the groups or clusters assessment is on the high archaeological site density settlement pattern in the study area to the north of WACA. The newly discovered cliff dwellings to the west of WACA are the focus of the individual cultural resource properties assessment. However, historic cultural resource properties are also assessed regarding national significance.

National Significance Assessment of Groups or Clusters of Cultural Resource Properties in the Study Area

MNA sought to identify any clustering of cultural resources properties in the study area that exist independently or are an extension of the cluster or clusters that exist within WACA. This is an important step because if clustering cannot be demonstrated then cultural resources properties must be evaluated individually with respect to National Significance. Both visually (see Figure 6.2) and analytically (see Figures 6.4, 6.6, 6.7, and 6.8) newly and previously recorded sites in the study area to the north of WACA are part of the same cluster. The archaeological sites to the north of WACA within the study area while numerous are relatively humble and would not be considered nationally significant if considered individually. Therefore, in order to be considered nationally significant these sites must be argued as being part of a cluster or group that is collectively nationally significant. Put another way, their national significance relies on their association with the arguably nationally significant cliff dwelling sites in WACA.

Clustering of cultural resources properties must be demonstrated not only spatially but temporally as well. In other words, the majority of the properties in a cluster must have components that are inferred as dating to the same time period for the cluster to be considered appropriate for further analysis. If a cluster of properties is defined from both the spatial and temporal perspectives then the national significance criteria can be applied to the whole.

Utilizing archaeological data provided by NPS and the CNF, data obtained through new archaeological survey, and previous research, MNA was able to define a spatially and temporally discrete cluster of cultural resources properties dating to the Elden Phase (A.D. 1150-1225; see Chapters 3 and 5). The cluster consists of properties along and under Walnut Canyon ledges (the famous cliff dwellings), Fort Sites (open air sites located on “islands” formed by the meanderings of Walnut Creek as it carved Walnut Canyon; see Chapter 2), and open air habitation sites located on immediately adjacent rim areas of Walnut Canyon. Previous research (Acord 2005; Bremer 1988) suggested that this cluster is formed of sub-clusters based on different criteria but the whole may be referred to as the Walnut Canyon village. While it has not been formally assessed, the Walnut Canyon village is clearly nationally significant (see Chapter 3). Other Elden Phase site clusters are present in the Flagstaff area but they are located

outside and to the north of the study area. In the study area, particularly to the north of WACA, previous research and new survey by MNA documented the presence of numerous small sites. Are these small sites part of the aforementioned Walnut Canyon village? The vast majority of these sites date to the A.D. 1076-1150, before the Elden Phase (see Chapter 5). Therefore, based on current information which consists almost entirely of surface survey data, these sites cannot be argued to be part of the Walnut Canyon Village cluster, which date to the later Elden Phase (A.D. 1150-1225). These small sites must be evaluated individually and none of them merit a national significance designation. In sum, current evidence indicates that the boundary of the Walnut Canyon village is subsumed within the boundary of WACA and does not extend into the study area.

National Significance Assessment of Individual Cultural Resource Properties in the Study Area

The newly discovered cliff dwellings to the west of WACA are the focus of the national significance assessment from the individual cultural resource properties perspective. Eight of the 12 documented sites form a visually apparent spatial cluster (see Figure 5.1). However, from the temporal perspective the cluster is not coherent, particularly (only dateable generally to the Sinagua era) in comparison to the Elden Phase (A.D. 1150-1225) Walnut Canyon Village cluster. Therefore from the national significance perspective we evaluated these sites from the individual cultural resource property perspective. At first blush these properties appear to be potentially nationally significant. Because of this, a line-by-line, so to speak, consideration of these properties is warranted. Below text from the 1999 National Register Bulletin, Section IV (how to evaluate and document national significance for potential national historic landmarks), on how to prepare national historic landmark nominations is quoted at length in italics (the actual criterion language is presented in bold) followed by our assessment. It is important to note that: (1) These criteria are only applicable to the designation of a new National Park Service unit and that a cultural resource property(s) only need to meet one of the criteria in order to be considered nationally significant; and (2) WACA was established by Presidential Proclamation before NHL criteria had been articulated, however, because this assessment is about NHL criteria, we consider the Elden Phase Walnut Canyon Village within WACA to be nationally significant.

NHL Criterion 1:

Properties which are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained.

The events associated with the property must be outstandingly represented by that property and the events be related to the broad national patterns of U.S. history. Thus, the property's ability to convey and interpret its meaning must be strong and definitive and must relate to national themes. The property can be associated with either a specific event marking an important moment in American history or with a pattern of events or a historic movement that made a significant contribution to the development of the United States.

The property that is being evaluated must be documented, through accepted means of historical or archeological research, to have existed at the time of the event or pattern of events and to have been strongly associated with those events. A property is not eligible if its associations are merely speculative. Mere association with historic events or trends is not enough to qualify under this criterion. The property's specific association must be considered of the highest importance.

Based on surface evidence the newly discovered cliff dwellings cannot be firmly temporally associated with the nationally significant Elden Phase Walnut Canyon village already encompassed by WACA, they can only be inferred to date generally to the Sinagua era, and therefore a national significance claim for them cannot be made under NHL Criterion 1.

NHL Criterion 2:

Properties that are associated importantly with the lives of persons nationally significant in the history of the United States.

MNA's founder, Harold Colton, could be argued to be nationally significant in the intellectual history of the United States (see Chapter 3) because he articulated the concept of the Sinagua culture and its attendant intellectual implications and legacy. Following from this, all archaeological sites that can be inferred as having Sinagua cultural affiliation are associated with Harold Colton. However NHL Criterion 2 states, "...associated importantly..." indicating that not just any association is nationally significant, only important ones. Harold Colton is not known to have had specific knowledge of the newly discovered cliff dwellings while he was formulating the Sinagua concept. So the newly discovered cliff dwellings were not important in the formulation of the Sinagua concept. From the perspective of importance to concept formulation the newly discovered cliff dwelling sites are not nationally significant under NHL Criterion 2. However, logically, it should be noted that if one considers every archaeological site with a Sinagua cultural affiliation to be "...associated importantly..." with Harold Colton then a case could be made for the national significance of all archaeological sites with Sinagua cultural affiliation.

NHL Criterion 3:

Properties that represent some great idea or ideal of the American people.

A national significance claim for newly discovered cliff dwellings cannot be made under NHL Criterion 3 because while Harold Colton and the Sinagua concept could be argued to be nationally significant in the intellectual history of the United States the concept has not gone on to become a great idea or ideal of the American people.

NHL Criterion 4:

Properties that embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style, or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction.

This criterion's intent is to qualify exceptionally important works of design or collective elements of design extraordinarily significant as an ensemble, such as a historic district. It applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, and engineering. The property must clearly illustrate the physical features or traits that commonly recur in individual types, periods or methods of construction. A property also must clearly contain enough of those characteristics to be considered one of the best representatives of a particular type, period, or method of construction. (Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.) A building or structure is a specimen of its type or period of construction if it is an exceptionally important example (within its context) of design or building practices of a particular time in history. The language is restrictive in requiring that a candidate be "a specimen exceptionally valuable for the study of a period, style, or method of construction" rather than simply embodying distinctive characteristics of a type, period, or method of construction. With regard to historic districts, an entity must be distinctive and exceptional. This criterion will not qualify all of the works of a master, per se, but only such works that are exceptional or extraordinary. Artistic value is considered only in the context of history's judgment in order to avoid current conflicts of taste.

The question regarding Criterion 4 is: Are the newly discovered cliff dwellings exceptionally important examples of the Walnut Canyon cliff dwelling architectural style, which is argued to be nationally significant above as a part of the Elden Phase Walnut Canyon village and which is encompassed by WACA.

"One of the best", "exceptionally important", and "rather than simply embodying distinctive characteristics of a type, period, or method of construction", these are the phrases used in Criterion 4. Frankly, when compared to some of the largest and best preserved cliff dwellings in the Walnut Canyon village, the newly discovered cliff dwellings are not "one of the best" examples nor are they "exceptionally important" in defining the Walnut Canyon cliff dwelling site type or architectural style.

It is important to distinguish between the general pattern of the Walnut Canyon cliff dwelling site type and architectural style and the specific entity of the Walnut Canyon village which contains a cluster of cliff dwellings dating to the Elden Phase (A.D. 1150 – 1220). We argue above that the Elden Phase Walnut Canyon village is nationally significant and that it is currently encompassed by WACA. To be compared to Walnut Canyon village, a newly discovered cliff dwelling would need to date to the Elden Phase. If the newly discovered cliff dwelling was only generally Sinagua in cultural affiliation without a firm temporal affiliation and it "simply embodied distinctive characteristics of" the Sinagua Walnut Canyon cliff dwelling "type, period, or method of construction" then it would not be nationally significant because the Criterion 4 language is restrictive to "exceptionally valuable".

Because of the lack of firm temporal affiliation with the Elden Phase (A.D. 1150 – 1220), a national significance claim for newly discovered cliff dwellings cannot be made under NHL Criterion 4.

NHL Criterion 5:

Properties that are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture.

This criterion is meant to cover historic districts such as Williamsburg, Virginia; New Bedford, Massachusetts; or Virginia City, Nevada, which qualify for their collective association with a nationally significant event, movement, or broad pattern of national development. Most historic districts that are nationally significant for their extraordinary historic importance, rather than for their architectural significance, are recognized by this criterion.

Criterion 5 uses terminology like “exceptional” and “outstandingly commemorate”. Further this criterion is about historic districts that are nationally significant because of their historic importance rather than their architectural significance. As has been alluded to, the important historic event or time period is the Elden Phase. We can not specifically infer Elden Phase temporal affiliation to the newly discovered cliff dwellings, therefore they would need to qualify under Criterion 4 (“One of the best”, “exceptionally important”, and “rather than simply embodying distinctive characteristics of a type, period, or method of construction”), which they do not.

A national significance claim for newly discovered cliff dwellings cannot be made under NHL Criterion 5.

NHL Criterion 6:

Properties that have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

Criterion 6 was developed specifically to recognize archeological properties, all of which must be evaluated under this criterion. Properties being considered under this criterion must address two questions:

- 1) what nationally significant information is the site likely to yield? and*
- 2) is the information already produced nationally important?*

Answers to both questions must be well documented and logically organized. In order to establish the national significance of an archeological resource, it must be demonstrated how the data has made or will make a major contribution to the existing corpus of information. This criterion requires that potentially recoverable data are likely to substantially modify a major historic concept, resolve a substantial historical or anthropological debate, or close a serious gap in a major theme of American history. It is necessary to be explicit in demonstrating the connection between the important information and a specific property. The discussion of the property must include the development of specific important research questions which may be answered by the data contained in the property. Research questions can be related to property-

specific issues, to broader questions about a large geographic area, or to theoretical issues independent of any particular geographic location.

The current existence of appropriate physical remains must be ascertained in considering a property's ability to yield important information. Properties that have been partly excavated or otherwise disturbed and that are being considered for their potential to yield additional important information must be shown to retain that potential in their remaining portions.

Properties that have yielded important information in the past and that no longer retain additional research potential (such as completely excavated archeological sites) must be assessed essentially as historic sites under Criterion 1. Such sites must be significant for associative values related to:

- 1) the importance of the data gained or*
- 2) the impact of the property's role in the history of the development of anthropology/ archeology or other relevant disciplines.*

“Major scientific importance”, “large areas of the United States”, and “to a major degree”; these are the key terms expressed by Criterion 6. In the NPS NHL Bulletin it states that two questions must be addressed, with an affirmative answer, for properties to be nationally significant:

- 1) What nationally significant information is the site likely to yield?
- 2) Is the information already produced nationally significant?

Regarding the first question, due to the presence of archaeological deposits in sheltered contexts in the newly discovered cliff dwellings it is clear that perishable archaeological resources such as plant parts, textile fragments, string, sandals, basketry, etc. would likely be recovered if excavations were conducted (see Downum et al. 2000). Perishable material is relatively rare in archaeology and this rareness gives these items additional importance because they constitute material culture that is generally not preserved in open-air sites. However, would this material be of major scientific importance in the sense that it would “reveal a new culture, shed light upon periods of occupation over large areas of the United States, or yield data affecting theories, concepts and ideas to a major degree?” Regarding the Sinagua period, it seems unlikely that perishable archaeological resources from the newly discovered cliff dwelling would be of “major scientific importance” or affect “to a major degree” our “theories, concepts and ideas”. It is likely that what would be recovered would be additional examples of what Downum et al. (2000) recovered from the Walnut Canyon village area. Any recovered material would augment a sparse database and that would be a welcome development. However, again, it would be unlikely to change our interpretations to a “major degree”.

In the vicinity of the newly discovered cliff dwellings, a site has been excavated that yielded split twig figurines dating to the Late Archaic period (Schley 1964). This finding suggests that Archaic period material could be a component of archaeological deposits associated with the newly discovered cliff dwelling sites. However, we must balance this speculation with

the reality that the later occupants of the alcoves, the Sinagua, probably heavily disturbed or removed Archaic deposits during the construction and use of their cliff dwellings. The alcove site where the split twig figurines were recovered is unique in that it was not subsequently occupied by later peoples. Further, if additional Archaic period material were recovered would it “substantially modify a major historical concept, resolve a substantial historical or anthropological debate, or close a serious gap in a major theme of American history?” While this is always possible, it seems unlikely based on current knowledge.

In sum, the newly discovered cliff dwellings, based on surface material alone, have not made a major contribution to the existing corpus of information. While the deposits in the newly discovered cliff dwellings are likely to contain perishable Sinagua-aged archaeological resources it is unclear whether this material would significantly change our knowledge of the range of variability pertaining to these items. However, it is possible that it might. There is a possibility that Archaic-aged material is preserved in the newly discovered cliff dwelling sites. Even if this were to be true it is unclear if this material would substantially change our understanding of the Archaic period in the Walnut Canyon area. Again, it is possible that it might. In the end we are left with possibilities that do not measure up to the “major” dictates of Criterion 6.

Finally, regarding a high degree of integrity, the NPS NHL bulletin notes that a property must retain the essential physical features that enable it to convey its historical significance. These essential physical features are those that define both why a property is significant (NHL criteria and themes) and when it was significant. As alluded to above, while the newly discovered cliff dwellings can be inferred to have a Sinagua temporal affiliation, they can not be specifically associated with the Elden Phase (A.D. 1150-1220), which is the time period during which the nationally significant Walnut Canyon village existed. This is because our study was limited to recording surface material only. More research would have to be conducted such as data recovery to recover a larger ceramic assemblage, as well as radiocarbon dating to better determine the age and cultural affiliation of these newly discovered cliff dwellings.

A national significance claim for newly discovered cliff dwellings cannot be made under NHL Criterion 6 based on surface evidence.

National Significance Assessment of Historic Cultural Resource Properties in the Study Area

In assessing whether lands within the study area should be included in a new NPS unit, the character, condition, and significance of historic cultural resource properties must be considered. Documented sites primarily include camps that housed logging and construction crews, logging railroad alignments, and short-term camps for hunting or recreation. The size and condition of these sites varies widely, but most retain enough intact features or artifacts that they can be assigned to a temporal period and often to a specific function. Many of these sites reflect activity important in local and regional economic development, especially those related to logging and ranching. Much of Flagstaff’s early history involved development of these extractive industries, including construction of numerous sawmills, logging camps, and miles of temporary railroad grade to transport logs. Indeed, logging and forestry was a crucial aspect of the region’s economy through the middle of the twentieth century (Cline 1976, 1994).

Despite their association with these regionally-important economic activities, none of the known historic resources within the study area can be considered nationally significant based on criteria stipulated for designation of National Historic Landmarks (see above). Even sites that retain relatively well-preserved artifact assemblages, which can be used to securely date and assess site function, do not manifest characteristics of national significance. One site that might qualify as nationally significant for context and construction technique, the Santa Fe Dam, is not in Federal jurisdiction and is thus not subject to this assessment. None of the known historic resources are nationally significant as an individual property, nor do the sites present a cumulative district that could be considered nationally significant. This does not diminish their importance in providing evidence of the rich and enduring history of the region, but it does not support the establishment of a new NPS unit.

Summary Statement Regarding the Assessment of the National Significance of Cultural Resource Properties in the Study Area

In sum, based on previous research and the analysis of existing and newly acquired archaeological data, MNA argues that no nationally significant cultural resource properties are present in the study area outside of WACA. Given this, based on an appraisal from solely the cultural resource properties perspective, Interior/NPS cannot suggest a new NPS unit as management option for the study area.

**APPENDIX D: WALNUT CANYON NATIONAL MONUMENT
SPECIAL STUDY COMMENTS THROUGH AUGUST 2010**

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**WALNUT CANYON NATIONAL MONUMENT
SPECIAL STUDY COMMENTS
THROUGH AUGUST 2010**



**WALNUT CANYON SPECIAL STUDY
PUBLIC COMMENT SUMMARY
OUTREACH PERIOD FROM MARCH 22 – JULY 26, 2010
AUGUST 2010**

INTRODUCTION

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

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

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

A newsletter was sent to the public; a project-specific Web site was established; and USFS, NPS, Coconino County, and the City of Flagstaff hosted a series of public open house events to provide opportunities for public input and discussion on development of the special study for the Walnut Canyon Study Area.

The purpose of this document is to provide a summary of public comments received during this initial phase of public outreach. The comments will be used to develop preliminary management options, which will be developed with USFS, NPS, Coconino County, and the City of Flagstaff representatives, as well as other jurisdictional and land owner agencies. Once the initial management options are drafted, the public will be asked again to provide comment and input on the management options.

PUBLIC OUTREACH

The initial public outreach period was from March 22 through May 26, 2010; however, requests were received for an extension and the period was extended to July 26, 2010.

Newsletters:

A newsletter was prepared and sent to the initial project mailing list via e-mail or U.S. Postal Service on March 22, 2010. The newsletter introduced the project and partners; described the Walnut Canyon Study Area, current uses of the study area, and the special study process; and how interested persons could submit comments. A comment form was included in the newsletter for the public to complete and return.

A project mailing list was developed from mailing lists provided by the USFS, NPS, Coconino County, and the City of Flagstaff. The initial mailing list comprised 753 entries. The mailing list is continually updated as requests and comments are received.

Web Site:

A project-specific Web site was developed and presented on-line. The Web site contained the same information as the newsletter, with additional maps and photographs, and an interactive page for submitting comments electronically.

Press Release:

Press releases were prepared to announce the project and public meetings and were sent to local newspapers, radio stations, and organizations totaling over 100.

Public Open Houses:

The USFS, NPS, Coconino County, and the City of Flagstaff hosted a series of open house events in April 2010, which were held at the following locations:

Date	Time	Location
April 19, 2010	4:00 pm to 7:00 pm	Kachina Village, Highlands Fire Station (Fire Station 21) 568 Kona Trail (Kmetko Center)
April 21, 2010	4:00 pm to 7:00 pm	Flagstaff City Hall Lobby 211 West Aspen Avenue
April 22, 2010	4:30 pm to 7:00 pm	Cromer Elementary School Library 7150 Silver Saddle Road

The open house events provided an opportunity for the public to engage in dialogue with the partner agencies; to learn about the special study (history, purpose, outcomes, etc.); ask questions; and discuss concerns. Opportunities were available for one-on-one discussions as well as to look-and-listen. The public was encouraged to provide input and comment in their own words, either at the open house events or at their convenience on the project Web site or on the comment forms.

Open house attendance was as follows:

- Kachina Village 10
- Flagstaff City Hall 65
- Cromer Elementary 37

PUBLIC CORRESPONDENCE AND COMMENTS

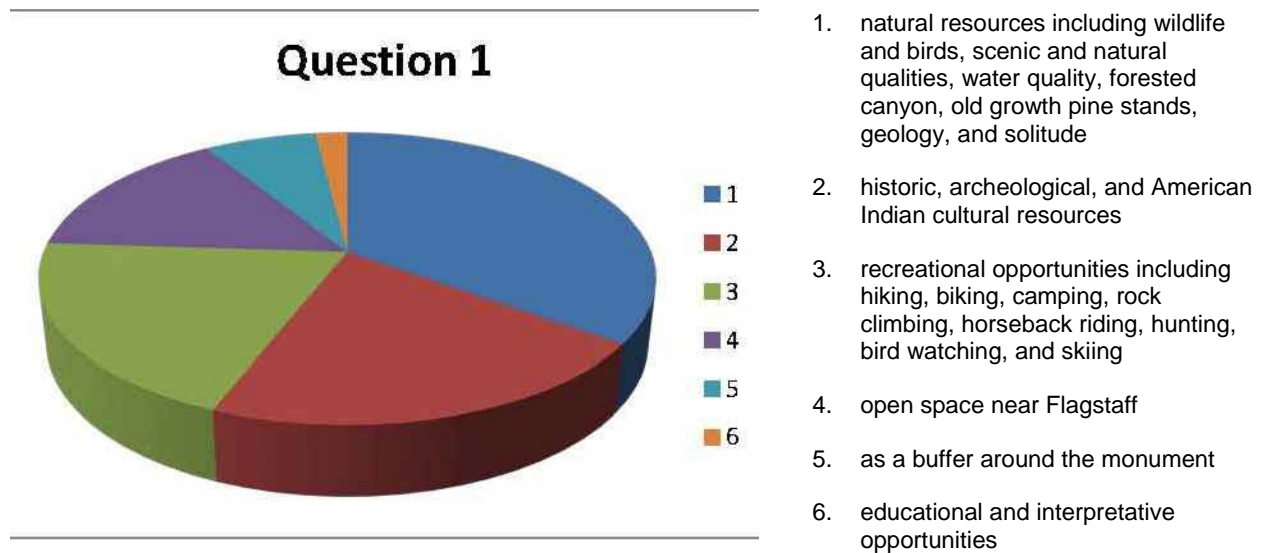
A total of 328 pieces of correspondence was received during the first public outreach period. All correspondence was read and analyzed for comments. Attachments to comment letters are in the project file for reference during the workshops. All comments were entered into an Excel database, and all comments and attachments will be distributed to the project team. Based on analysis of data and the input gathered during this public outreach period, the project team will participate in a workshop to develop conceptual management options. These management options will be assessed against criteria and methods for assessment of the management options (such as meeting goals and objectives, the benefits and impacts of management options, etc.).

COMMENT SUMMARY

The comment forms that were included with the newsletter and distributed at the public open house events contained four questions for the public to address. Commenters also submitted individually composed letters.

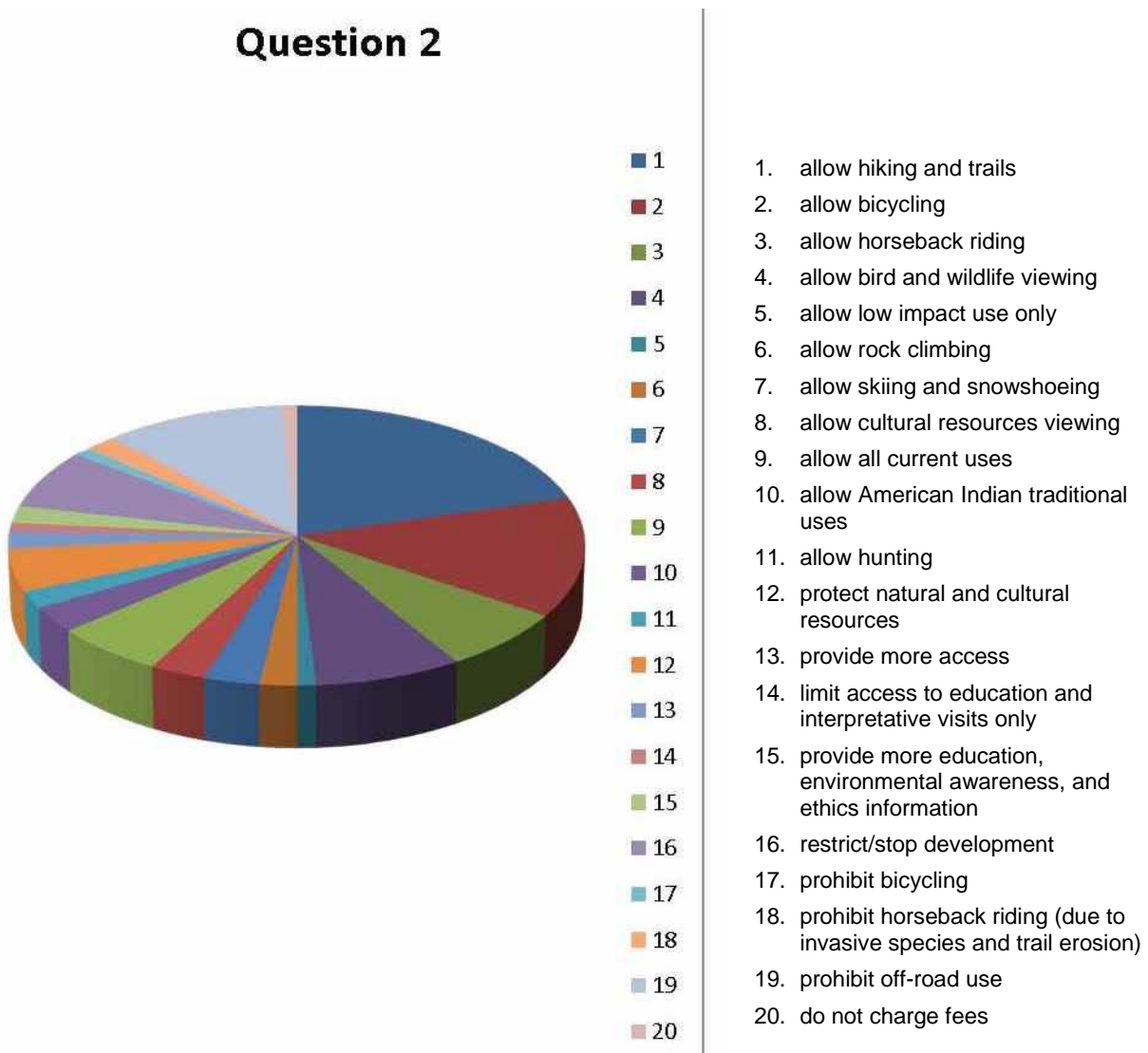
1. Why is the Study Area important to you and what makes it special?

Commenters felt that the study area and monument are amenities to Flagstaff and the state of Arizona. Many commenters indicated that recreational values were important to them, as was keeping the open space accessible and free. Others expressed a desire to keep the Walnut Canyon Study Area “in the most natural and wild state as possible.” The diversity of plant communities was stressed as an important feature of the study area, as well as the area as habitat for species of concern. Cultural resources and area history were also cited as important. Of the comments received that specifically answered this question, the majority of responses cited preservation of the resources and qualities important, as summarized in the chart below:



2. What recreational / visitor opportunities / uses do you think should be addressed by the Special Study and maintained in future options?

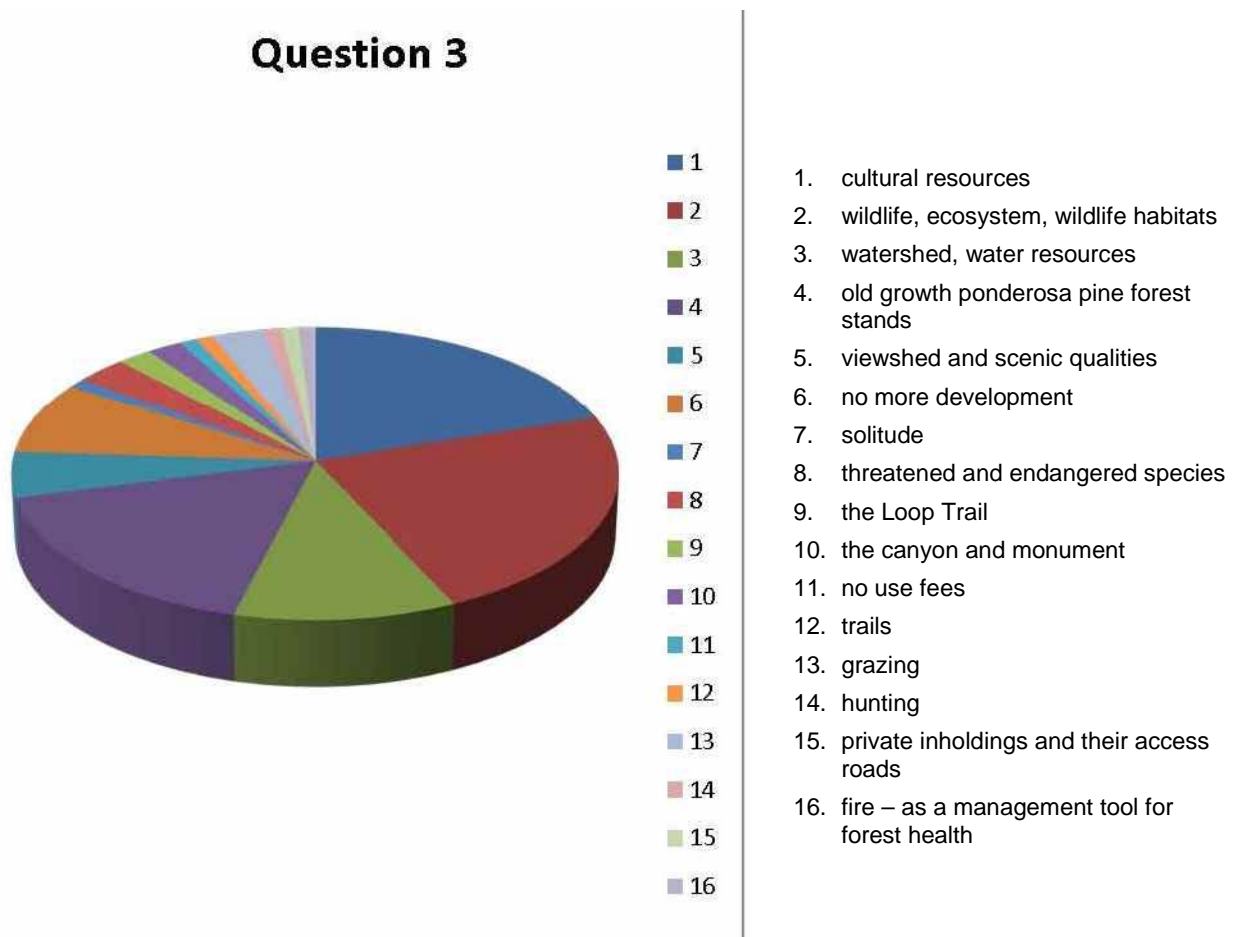
Many responders felt that hiking, mountain biking, dog walking, and rock climbing should be allowed to continue in this area. Concerns were expressed that personal livelihoods, economic benefits, and overall health of the community would be affected if additional restrictions were placed on grazing, concessions, mountain biking, dog walking, and access. Many commented that there should be multiple access points and access should be free. Some commented that access should be restricted to protect sensitive resources. Others suggested that permitting and day use fees be considered as a means to further develop activities and organized recreational opportunities. Those that commented on hunting generally supported its continuance for the health of wildlife, specifically elk, while some responders felt that hunting should be discontinued in the study area. Of the comments received that specifically answered this question, a majority advocated for maintaining uses summarized in the chart below:



Items receiving less than 1% of comments include allow camping, allow ATVs on designated roads, and prohibit any type of recreation.

3. What resources do you think should be addressed by the Special Study?

Specific species were cited to be addressed and include Mexican spotted owl, goshawks, black bear, wild turkey, and old growth ponderosa pine stands. One suggestion was to reintroduce endangered animals such as the pronghorn and Mexican gray wolf. It was mentioned that the area serves as a wildlife corridor to help animals pass across the Mogollon Rim and into the San Francisco Peaks area. The diversity of plant communities of the study area, water quality, and the watershed were also mentioned. Many commented on the need to preserve the cultural resources and history of the monument and surrounding area. Of the comments received that specifically answered this question, the responses are summarized in the chart below:



Items receiving less than 1% of comments include trail impacts, recreational uses, cost and impact to community, fuel wood gathering, and fire – urban interface.

4. What other management issues do you think should be addressed by the Special Study?

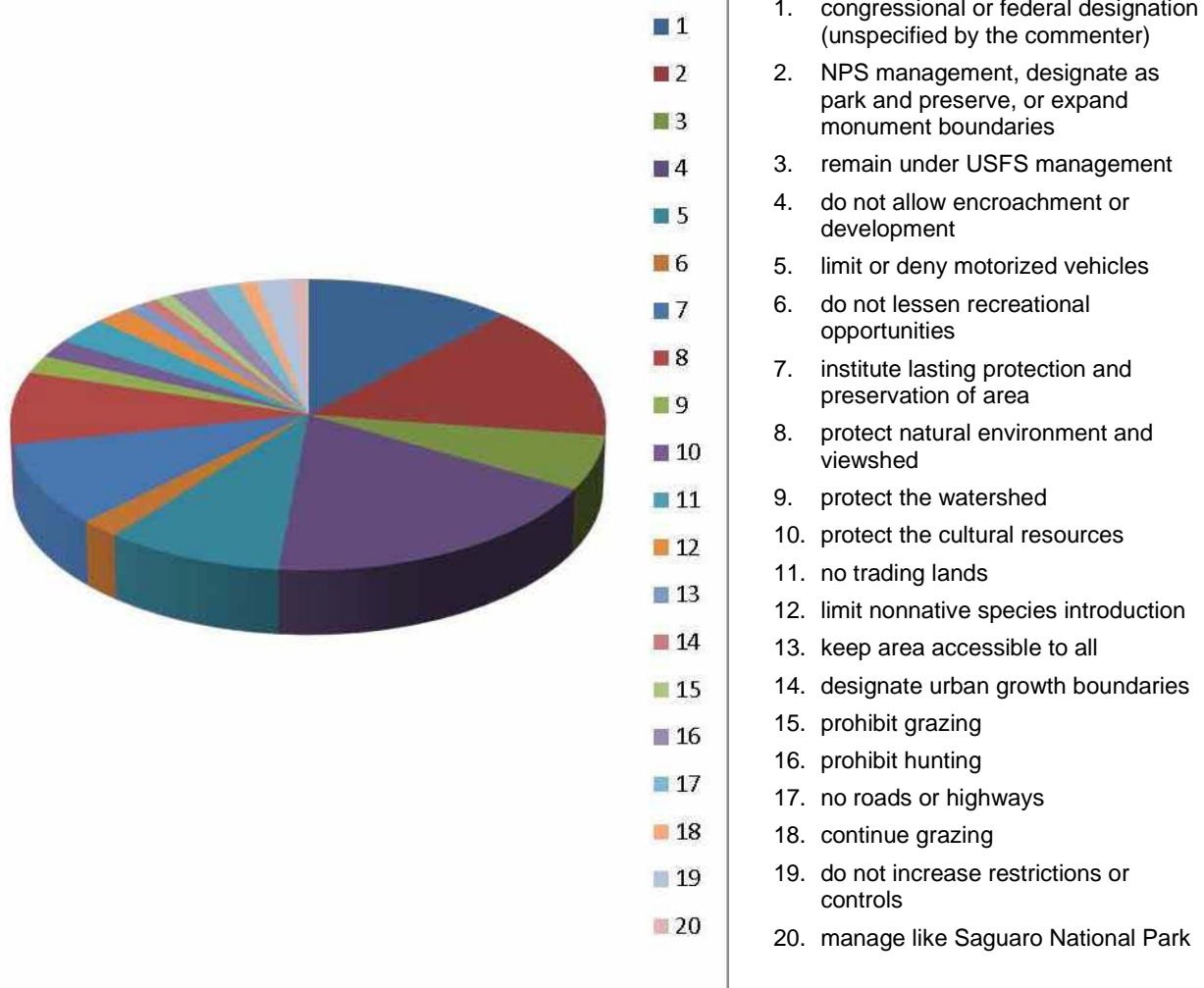
Some commenters expressed interest in the study area being transferred to NPS management and/or expansion of current monument boundaries. Some expressed that the study area should have the same protections as the current monument. Some felt that the monument should be made into a park. Other commenters preferred that the study area stay under USFS management and that current multiple uses should be allowed to continue. Some commenters supported transferring management to the National Park Service with conditions such as “existing land uses should be maintained; and access for the public should be maintained. Hunting, hiking, and mountain biking are some of the most important public values for this part of the Coconino National Forest, and that should not change if the land changes to NPS ownership.” Another commenter stated that the Flagstaff/Lake Mary Ecosystem Analysis (FLEA) Amendment addresses the main concerns for this management area.

Many commenters were not specific about which agency, yet offered other management strategies. One commenter suggested that ...”while the legislation guiding this work clearly states that the questions of significance and feasibility, which is used in evaluation possible new units to the Park System, be used in evaluating whether part or all of the study area be added to Walnut Canyon National Monument, it would also be useful to apply the normal criteria the Park Service has established for potential boundary changes.” Another commenter suggested that the land need to be surveyed for wilderness character under the Wilderness Act of 1964. Commenters expressed concern and want permanent protection from land swap and development.

Suggestions for alternatives were made including earlier proposals to expand the monument’s boundary and Sections 20 and 30 (Arizona State Trust Lands). Designation of the area as a National Conservation Area (NCA) was suggested; although while some felt this would provide the necessary protection and maintain current access and uses; others felt the designation would be “too inflexible and would disallow future noninvasive developments that could enhance usability and enjoyment.” A few comments suggested designation as a natural area (not a recreational area). Another suggested “designating the study area as Ponderosa Forest National Monument, with a designated mission to further scientific study and public education of this ecosystem and the efforts being made to restore it. This area at the edge of Flagstaff, so close to Northern Arizona University (NAU) with its forestry school and Ecological Restoration Institute as well as the Rocky Mountain Research Station, would be a perfect location for scientific investigation and equally important public education.”

Of the comments received that specifically answered this question, the responses are summarized in the chart below:

Question 4



Responses from American Indian Tribes

Hopi Tribe. This letter is in response to your April 5, 2010, correspondence regarding the National Park Service (NPS) and U.S. Forest Service (USFS) initiating a special resource study to explore management options for a 30,000 acre area of the Coconino National Forest surrounding Walnut Canyon National Monument. The Hopi Tribe claims ancestral and cultural affiliation to the Sinagua prehistoric cultural group in Walnut Canyon National Monument and surrounding Forest Service lands. Walnut Canyon is an ancestral home of the Bluebird and Bearstrap Clans and a traditional cultural property of the Hopi Tribe.

Therefore, we appreciate the NPS's and USFS's continuing solicitation of our input and your efforts to address our concerns. The Hopi Cultural Preservation Office supports identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we

consider the archaeological sites of our ancestors to be Traditional Cultural Properties. We understand this study results from an Act of Congress and involves a possible expansion of Walnut Canyon National Monument. We have participated in such studies previously. As Director of the Hopi Cultural Preservation Office, I will be the contact person regarding the Walnut Canyon Study. To set up a meeting with the Hopi Cultural Preservation Office to discuss issues of mutual concern related to the study.

Responses from State Agencies

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

1. The Arizona Game and Fish Department (AGFD) supports management options for lands within the Walnut Canyon Study Area that will ensure the protection of this area from development in perpetuity.
2. AGFD supports continued mixed recreational use with the WCSA, including hunting and other appropriate uses (e.g., wildlife watching). The department has determined that hunting, particularly on Coconino National Forest lands in those portions of the study area south and southwest of the current national monument, functions as an important tool for wildlife management and for minimizing urban human-wildlife conflicts in areas such as the neighborhoods adjacent to Continental Country Club. Hunting in the WCSA regulates the elk herds that regularly move into the Continental area, causing damage to the golf course and homesites and producing frequent and unpleasant close encounters with residents, which the department is often called to address.
3. The preference of AGFD would be continued U.S. Forest Service ownership and management of the greater WCSA lands outside current monument boundaries, though the department could also support NPS management provided continued support for items 1 and 2 above. In particular we would advocate for the continued allowance of hunting in the WCSA. Hunting is allowed in various other NPS units in the United States by federal statute, and can thus be compatible with a range of other recreational uses and aesthetic values associated with national parks if appropriately regulated.
4. AGFD encourages the Walnut Canyon Special Study to explore the idea of creating a Walnut Canyon National Conservation Area (NCA) or some comparable arrangement as a possible solution to management of the WCSA. This alternative was proposed to the department by a local citizen and has been used as a management model for many Bureau of Land Management lands. NCAs can accommodate hunting (e.g., Gila Box Riparian and Las Cienegas national conservation areas in Arizona) and ensure protection of the WCSA from development in perpetuity, and the department advocates that both of these conditions be included if National Conservation Area designation is pursued.
5. If a National Conservation Area or similar management alternative is considered, the AGFD advocates the possible inclusion of Arizona State Land Department (ASLD) sections within the WCSA as part of the NCA. In the aforementioned citizen's proposal to AGFD (see item 4), it was recommended that ASLD would retain all rights to its lands within the study area. However, the

department does not support the latter provision. AGFD views the potential for urban development on the included ASLD sections as one of the principal threats to the ecological integrity of the WCSA, and development on these sections could also lead to an increase in human/wildlife conflicts as described in item 2 above. Possible mechanisms for acquiring ASLD sections in the WCSA could include exchange for less sensitive USFS or NPS lands elsewhere, or reclassification for conservation purposes through the Arizona Preserve Initiative and subsequent purchase at ASLD auction.

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

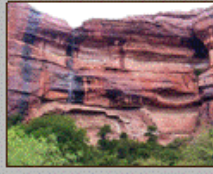
Organizations

Organizations providing correspondence and comments included:

- Flagstaff Biking Organization
- Coconino County Farm Bureau and Cattle Growers Association
- Sierra Club's Grand Canyon
- Friends of Flagstaff's Future
- Friends of Walnut Canyon
- Native River Guide (5th World Discoveries) NAU
- Progressive Democrats of Northern Arizona
- Puente de Hozo
- Willow Bend and A.C.E.
- PDNA
- South Oxbar Loop
- NACA
- ReGroup
- Arizona Elk Society
- Arizona Wildlife Federation
- Northern Arizona University
- Habitat Harmony, Inc.

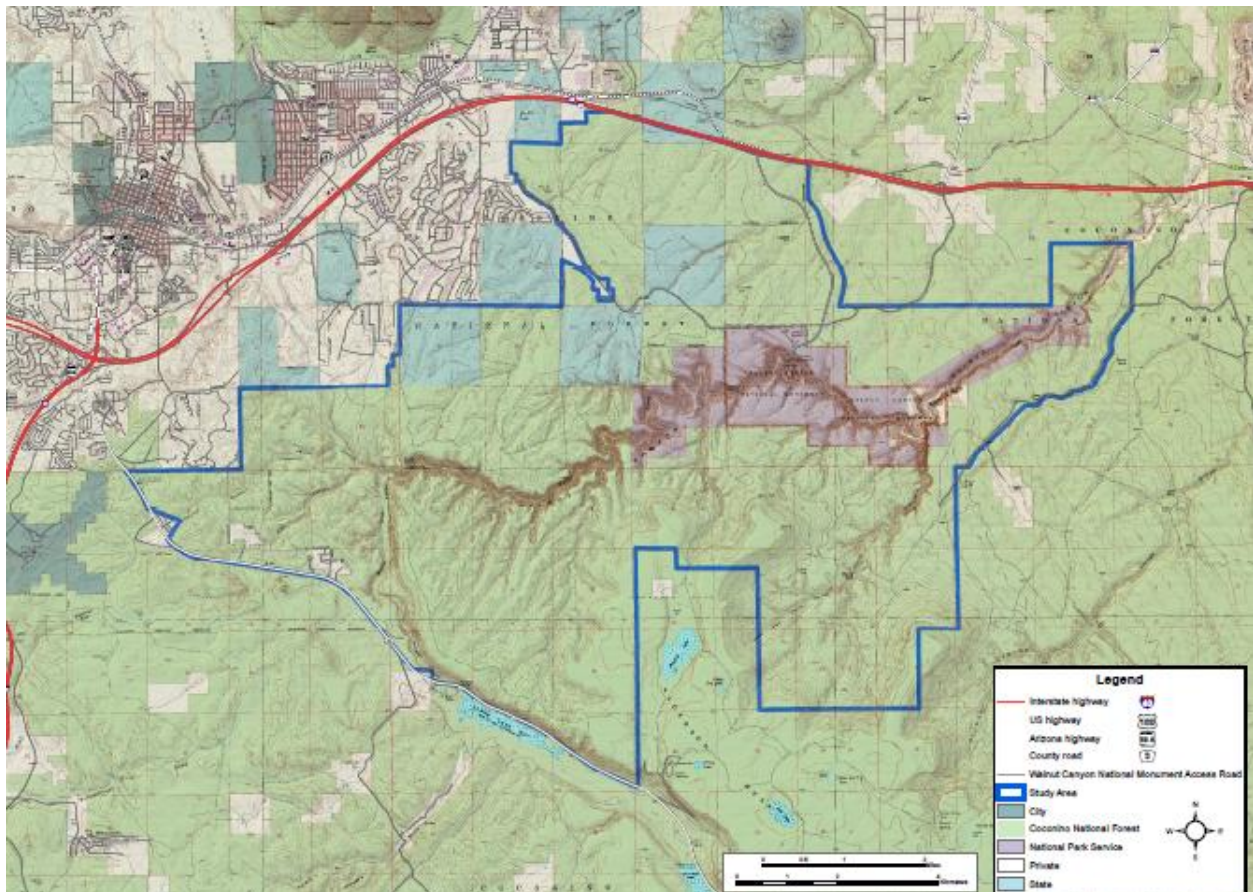
**APPENDIX E: WALNUT CANYON NATIONAL MONUMENT
SPECIAL STUDY COMMENTS MAY 2011 THROUGH JULY 2011**

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Walnut Canyon Study Area Special Study

WALNUT CANYON SPECIAL STUDY COMMENTS MAY 2011 THROUGH JULY 2011



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

INTRODUCTION

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

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

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

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

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

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

PUBLIC OUTREACH, PHASE II

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

Newsletters:

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

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

Website:

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

Press Release:

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

Public Open Houses:

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

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

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

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

The number of attendees signing in at the open house events were as follows:

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

PUBLIC CORRESPONDENCE AND COMMENTS

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

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

COMMENT SUMMARY

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

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

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

The following uses were mentioned once or twice:

- Picnicking
- Allowing ATVs during hunting season only
- Limited vehicle use
- Photography/painting
- Rock climbing
- Wildlife viewing
- Geocaching
- Cross country skiing/sledding
- Use of off road vehicles

Walnut Canyon Special Study Comments Through August 2011

- Consideration for allowing solar and wind farms

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

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

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

Some public comment expressed:

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

Some public comments expressed preferences for the preliminary management options:

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

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

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

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

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

Walnut Canyon Special Study Comments Through August 2011

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

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

Responses from American Indian Tribes

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

Dear Superintendent Chung and Supervisor Stewart,

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

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

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

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

Responses from State Agencies

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

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

use would lead to a decrease in the number of elk taken by hunters and an increase in the elk population in this area, leading in turn to more human-wildlife conflicts in the Flagstaff urban interface as described above. The Department would consider alternatives to TMR implementation for selected portions of the WCSA, if for example it were shown that OHV use presented the clear potential for damage to critical ecological and/or cultural resources.

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

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

Sincerely,

Mark Ogonowski

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

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

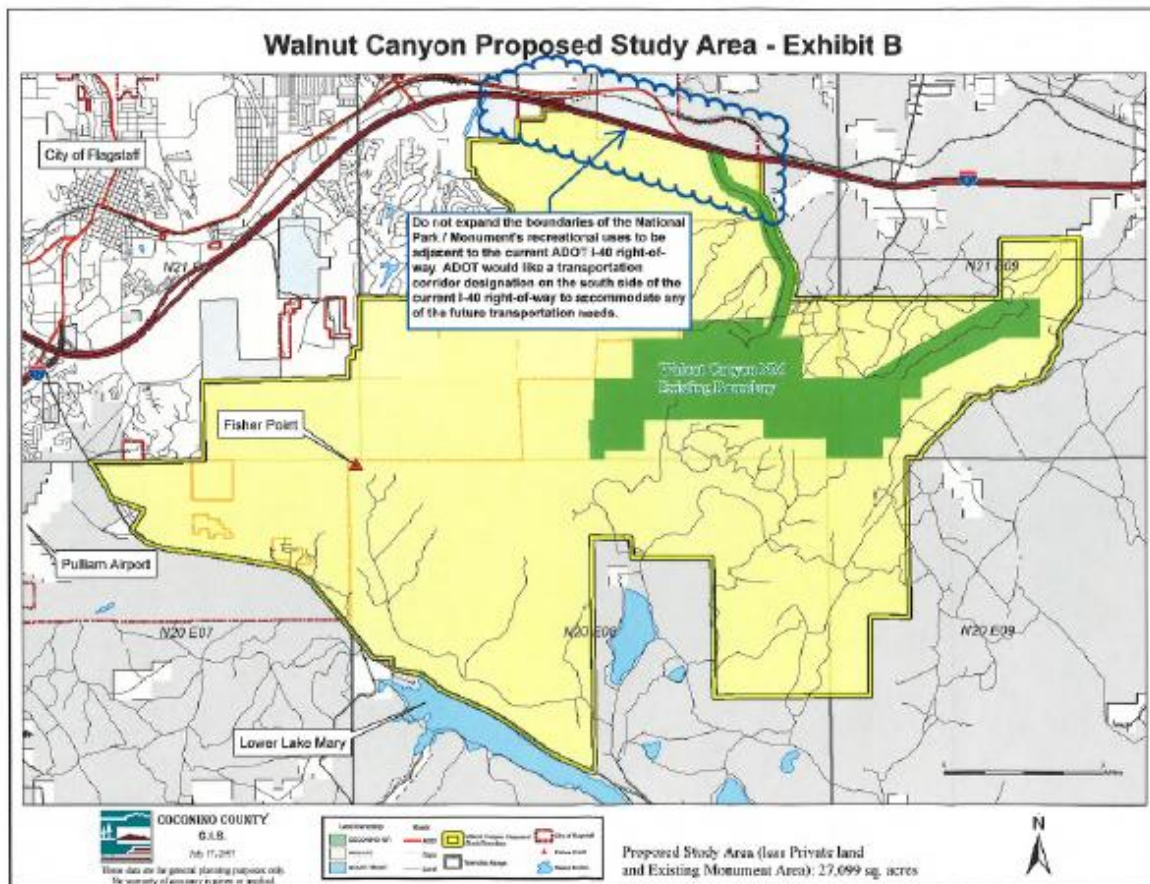
A letter dated July 9, 2010, was sent to Walnut Canyon Special Study Team describing the I-40 corridor study with an invitation to attend the agency information meeting which ADOT had hosted in Flagstaff, Arizona, on August 5, 2010. Proposed improvements are being recommended at Walnut Canyon TI (MP 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 e-mail at amansor@azdot.gov, or by phone at (602) 712 6961. My address is as follows:

Aszita Mansor
ADOT - Roadway Predesign Section
205 South 17th Avenue, MD 605E
Phoenix, AZ 85007



Organizations

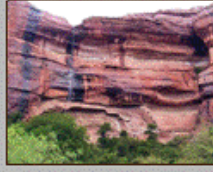
Official representatives from the following organizations providing comments:

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

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**APPENDIX F: WALNUT CANYON SPECIAL STUDY
DRAFT REPORT COMMENTS MAY 10 THROUGH JULY 10, 2013**

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Walnut Canyon Study Area Special Study

Walnut Canyon Special Study Draft Report Comments May 10 Through July 10, 2013



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INTRODUCTION

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

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

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

On May 10, 2013, an e-mail notification was distributed to the project mailing list notifying the public and media of the release of the draft report. The project-specific website was updated and the report and additional maps posted to the website. The National Park Service also had hard copies available in the local libraries. The U.S. Forest Service, National Park Service, Coconino County, and the City of Flagstaff hosted a public open house event at the City Hall Council Chambers in Flagstaff, Arizona.

The purpose of this document is to provide a summary of public comments received during this third phase of public outreach. The public was invited to comment on the draft report.

WEBSITE

The project-specific website (www.walnutcanyonstudy.org) was updated to include the draft report and large format maps for the comment period.

PRESS RELEASE

Press releases were prepared to announce public meetings and were sent to local newspapers, radio stations, and organizations totaling over 100 media outlets.

PUBLIC OPEN HOUSE EVENT

The U.S. Forest Service (Coconino National Forest), National Park Service (Flagstaff Area Monuments and Intermountain Region), Coconino County, and the City of Flagstaff hosted an open house event on June 13, 2013, at the City Hall Council Chambers at 211 West Aspen Avenue in Flagstaff, Arizona, from 5:30 p.m. to 8:00 p.m.

The contractor prepared and presented a PowerPoint presentation on the process and findings of the study (see appendix A) and then provided the audience with an opportunity for questions and answers with the partner agencies. Opportunities were available for group and one-on-one discussions. The public was encouraged to provide input and comment in their own words, either at the open house event or at their convenience on the project website. There were 31 people from the public in attendance.

PUBLIC CORRESPONDENCE AND COMMENTS

Four written comments were received during the public meetings and an additional 46 comments were received through the website and in hardcopy form or letter for a total of 50 comments.

All correspondence was read and analyzed. All comments are included in appendix B. Comments were divided into two primary groups: those in support for proposed management option or other options, and those providing specific comment on the information in the report. The comment summary report and all comments were distributed to the project planning team. These comments were discussed for changes to the final report.

COMMENT SUMMARY

Support for:

- Option 1 (10)
- Option 2 (10)
- Option 3 (0)
- Support 800-acre boundary expansion to the monument (22)
- Support expansion of monument to include entire study area (3)
- Study area needs to be protected in perpetuity from development and trade (17)
- Do not support expansion of Monument (1)
- Keep open for use (2)
- Acquire the state trust lands / keep state lands from development/trade (11)

Representative Comments in Support of Options

Protect State Trust Land Parcels from Development – The final report for the Walnut Canyon Study Area should refer to the Flagstaff Regional Plan as a supporting document to rationalize protecting state trust land parcels.

Walnut Canyon Special Study
Public Comment on Draft Report Summary
Outreach period from May 10, 2013 – July 10, 2013
August 2013

Support a land designation that will protect the entire Walnut Canyon Study Area from land trades, fragmentation, and future degradation of its resources.

Multiple recreational uses should be protected and available without fees.

As the “backyard” to over 65,000 local residents and many other visitors, the proposed expanded lands provide outdoor experiences and opportunities that are too valuable to lock out or charge fees to experience.

It is imperative to have a modest expansion to the existing National Park and to add a scenic designation to the remainder of the Walnut Canyon Special Study Area that protects it from transfer, sale, or development.

Protect a buffer around Walnut Canyon National Monument for its scenic integrity, wildlife corridors, archeology, opportunities for solitude, old growth, trails, and loved recreational locations. Please be sure that protection from land exchanges is written into any enabling legislation.

If a modest monument expansion is declared to protect archeological resources adjacent to Walnut Canyon National Monument, the newly designated area should be managed in the same way as lands within the current Monument boundary.

Do not support anything to do with potential land closure or restricted use.

The proposed expansion puts some of the ranching community in harms way.

Comments Specific to Report Content

The final report for the Walnut Canyon Study Area should refer to the Flagstaff Regional Plan as a supporting document to rationalize protecting state trust land parcels. The regional plan identifies state trust land parcels in the study area as a high priority area for protection.

Add that if/when the State Trust Lands are acquired by government, they also cannot be traded.

State lands need to be included in study

Ownership of monument entrance road is not clear

Clarity about State Trust Lands

I suggest now small changes to a single paragraph on page 29 of the report, plus the addition of a short paragraph, as follows (revised or new text appears in red).

None of the options or management strategies presented in this report would be directly applicable to the Arizona State Trust Lands. For example, the Coconino National Forest Transportation Management Plan addressing road closures does not apply to state trust lands. If the study area were to receive a special management designation, state **trust lands would become inholdings within the designated boundary. (Currently, the state trust lands can be viewed as inholdings within Coconino National Forest.) The rights of the State Land Department would be preserved.** Options, land and

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resource management strategies and designation, and federal agency policies may apply to these state lands **only if and when they have been transferred** to federal agency management.

The boundaries of any special management area would be defined so that any state trust lands within the study area that may be acquired subsequently by purchase, exchange, or donation are retained within the boundaries of the special management area. Otherwise, a subsequent act of Congress would be required to incorporate the purchased, exchanged, or donated areas into the special management area.

A note about NCAs and protection against loss of land exchanged on page 27 with the following paragraph. To protect against loss of land by exchange, Congress frequently incorporates the statement, “Subject to valid existing rights, all Federal lands within [the specific entity] are hereby withdrawn from all forms of entry, appropriation, or disposal under the public land laws.” For example, those words were used to protect both Black Canyon of the Gunnison National Park and Gunnison Gorge National Conservation Area in 1999. Congress has used that statement when establishing all NCAs except the first two: 14 out of 16 NCAs. Thus the legislation that created an overwhelming majority of NCAs contains the highest level of protection against loss of land by exchange that Congress can confer.

National Scenic Areas. The website for Daniel Boone National Forest describes a “Natural Arch Scenic Area.” The word “National” does not appear. The area seems to have been designated by the U.S. Department of Agriculture, Forest Service, not by Congress. So I suggest that you use a different example of a “scenic area” on page 52. For example, Seng Mountain National Scenic Area was established in the Omnibus Public Lands Act of 2009.

Consistency in Describing the Number of Management Options. On page *i*, the report speaks of eight management options. Yet on page 15, the report talks about seven management options. I presume that the difference arises because of the late introduction of “Regional Forester Special Area Designation,” mentioned on page 17. Nonetheless, the report would benefit from consistency in describing the number of management options that the study team considered.

State section 30 and Planning Reserve Areas. In the last paragraph on page 24, the report says that “Two of the state land sections (20 and 30) are within a long-term planning reserve area defined in the Flagstaff Regional Plan such that it is generally anticipated that they will be developed within the next 10 to 30 years.” While that statement is correct for section 20, it is wrong about section 30.

Flagstaff still operates under the regional plan dated November 2001. In that plan, Planning Reserve Areas are described on pages 22–23 and must lie within the Stage 2 Urban Growth Boundary. Both maps 4 and 5 of the plan show that section 30 lies *outside* that boundary.

Moreover, the policies and recommendations of the *Flagstaff Open Spaces and Greenways Plan* (adopted January 1998) were incorporated into the regional plan. On page 124 of the OSGP, section 30 was assigned first priority for retention as open space (in contrast and on the preceding page, section 20 was assigned fourth priority).

1. Regardless of which designation is given to the study area, or if the U.S. Forest Service continues to manage the study area, the following management rules should apply:
 - The study area should be closed to mineral extraction.

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- Any new paved roads should be restricted, with the exception of the possible paving of FR 303, the “Old Walnut Canyon Road.”
 - The area should be off limits to solar and wind energy exploitation. Either of these would unduly restrict public use and cause severe damage to the natural resources that the study writers are charged to protect. The latest draft of the USFS Coconino Forest Plan would allow this in the SE portion of the study area.
 - The entire study area should be closed to ALL off-road use, including snowmobiles. In 1991, the U.S. Forest Service promised to close the “Fisher Campbell” area (basically the study area north of the canyon) would be closed to all off-road vehicles. At the time, there was a serious problem with snowmobiles in the area. Later, we were told to wait for the “5 Forest Pla,” which morphed into the Travel Management Rule. This rule does NOT include snowmobiles as promised.
2. The language should be added to the study that once the State Trust Lands are purchased/acquired by a federal agency, they cannot be traded to anyone other than another federal land management agency.
 3. The language in the document that says land cannot be traded except to another federal land management agency should be changed to say U.S. Forest Service or National Park Service only.

Pg i when quoting the law which authorized the study. It says: “another designation” rather than what the law actually says “any other designation.”

8. the map shows roads all over Campbell Mesa. Most of these roads have been obliterated.

The map shows water line across section 25 just north of Fisher Point and tanks in Section 31. Neither this water line nor tanks exist. There was a hose 30 years ago, and some galvanized tanks, which have been gone a long time.

11. The WACA General Management Plan “identifies circumstances that WOULD compel reevaluation of the need for a boundary expansion. The study quotes this incorrectly using the word “could” instead of “would.”

12. still quoting the WACA General Management Plan , bullet 3 ...”exchange of State Trust Lands that WOULD” Again the study document incorrectly quotes it as saying “could.”

19. Closing areas to firearms discharge – this was done years ago and the order revoked because they claimed it was no longer necessary. This has been confirmed with Ranger Mike Elson.

22. Figure 4 AZ Trail Trailhead in wrong location.

24. Says Sections 20 and 30 are within “a long-term planning reserve area.” This is not true. Section 20 is, but Section 30 is not.

53. Says there will be no change in fees with USFS management, while the rest of the documents says that there may be fees in the future, see page 20.

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The Special Management Options seem extremely unlikely unless another designation is found. The Study Area is not a National Scenic Area, while the U.S. Forest Service is extremely unlikely to adopt the Interior Department designation of National Conservation Area. In 2002 at least, the agency was adamantly opposed to it.

there is no mention of the phone survey which was conducted by NAU for Coconino County in 2002.

Also there is no mention of the “poll” that was taken at one of the City/County run Walnut Canyon meeting in 2002.

On page 10 it says “The study area has NOT been surveyed for **ethnological resources**.” WHY NOT?

The legislation orders “the Secretaries to conduct a study to assess “the suitability and feasibility of designation all or part of the study area as an addition to Walnut Canyon National Monument.” The draft of the study does not discuss this at all. It discusses whether the land is suitable for a National Historic Landmark, a National Park, and a new unit of the NPS.

“Authority for modifying park boundaries is contained in the Land and Water Conservation Fund Act amendments of June 10, 1977 (public Law 95-42.) A modification to the boundaries of a park is based on one or more of the following criteria:

- Expansion would include significant resources of opportunities for public enjoyment;
- Expansion would address operational and management issue: or
- Expansion would protect monument resources critical to fulfilling the purpose of the park.”

By omitting this information, the draft writers have not done what the Congress ordered them to do.

At the recent **Joint City Council/Board of Supervisors Meeting** it was represented that development around an existing monument could not be grounds for expansion. This is not what the WACA General Management Plan says on page 38 when it lists reasons that would compel reevaluation of the need for expansion. What was said at that presentation is in conflict with the existing management plan. A management option needs to be added which would allow part of the Study Area to be added to the Monument while the rest of the area will be permanently protected by the U.S. Forest Service.

Organizations

Official representatives from the following organizations providing comments:

- Arizona Riparian Council
- Arizona Trail Association
- Arizona Wildlife Federation
- Flagstaff Biking Organization
- Flagstaff Cycling

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- Flagstaff Trail Divas
- Friends of Flagstaff's Future
- Friends of Flagstaff Monument
- Friends of Walnut Canyon
- Gnarbarian Climbing
- Great Old Broads For Wilderness, Flagstaff Broadband
- National Parks Conservation Association
- Northern Arizona Audubon Society
- Northranch Owners Association
- Sierra Club
- Sierra Club Grand Canyon Chapter
- Sonoran Institute
- Walnut Canyon Ranches

Agencies

- Arizona Game and Fish Department

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APPENDIX A: JUNE 2013 PUBLIC MEETINGS

(PowerPoint Presentation)

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APPENDIX B: PUBLIC COMMENT

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APPENDIX G: TRIBAL CONSULTATION

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April 24, 2013

Chairman Ronnie Lupe
White Mountain Apache Tribe
P.O. Box 507
Fort Apache, Arizona 85926

Dear Chairman Lupe,

On March 30, 2009 President Barack Obama signed into law the Omnibus Public Land Management Act of 2009 as passed by the United States Congress. Included in this Act is language directing the Secretaries of Agriculture and the Interior to conduct a Study of Management Options focused on the Walnut Canyon National Monument, managed by the NPS, and the area within the Peaks and Mormon Lake Districts of the Coconino National Forest, as noted on the attached map, managed by the Forest Service. The study area includes federal, state, and private land surrounding Walnut Canyon National Monument, comprises approximately 30,000 acres, and is ten miles east of Flagstaff, Arizona.

The Act directs the Walnut Canyon Study to focus specifically on the following topics:

- The suitability, and feasibility of designating all or part of the study area as an addition to Walnut Canyon National Monument
- Continued management of the study area by the Forest Service; or
- Any other designation or management option that would provide for (i) protection of resources within the study area; and (ii) continued access to, and use of, the study area by the public.

The National Park Service (Flagstaff Area National Monuments) and the US Forest Service (Coconino National Forest) are pleased to report the draft Walnut Canyon Study Area Report is in its final revision, before it is released to the public for comment. A number of management options and designations were explored through public involvement and an agency workshop. A total of eight options were initially developed. Five of those options subsequently were dismissed as nonviable. Three management options were considered viable, including:

- continuation of current management by the U.S. Forest Service
- congressional action establishing a special designation to the Study Area
- congressional restriction on sale or exchange of lands within the Study Area

As specified by the act, the National Park Service conducted a national significance assessment of cultural resources in the Study Area to determine the suitability and feasibility of designating all or part of the Study Area as an addition to Walnut Canyon National Monument. The assessment concluded that, while important resources exist outside the current monument boundary, they do not rise to the level of nationally significant as per the criteria for a National Historic Landmark.

This report contains no recommendations from the U.S. Forest Service and National Park Service with respect to a preferred management option for the entire Study Area. Rather, the final report will be

forwarded to the secretaries of the Department of Agriculture and Department of the Interior. The secretaries may forward the report's findings and any departmental recommendations to Congress.

It is anticipated the report will be available for public review and comment mid to late May for 60 days. We will be holding public meetings during the public review period with dates yet to be determined. Posting of the report will be found on the website: <http://www.walnutcanyonstudy.org>.

We encourage you to comment and/or attend the public meetings. However, we are also available to meet with you at your request about the Walnut Canyon Study prior to or after the public review of the report. Please contact the Chief of Resources for the National Park Service, Lisa Leap at (928) 526-1157 ext. 222 or via email at lisa_leap@nps.gov. You may also direct questions to the Forest Service by contacting Craig Johnson, Tribal Liaison for the Coconino National Forest at (928) 527-3475, or by email at cjohnson@fs.fed.us.

We appreciate your continued interest.

Sincerely,

Leah McGinnis
Acting Superintendent
Flagstaff Area National Monuments
National Park Service

Earl Stewart
Supervisor
Coconino National Forest
United States Forest Service

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April 24, 2013

Chairman David Kwail
Yavapai-Apache Nation
2400 W. Datsi Street
Camp Verde, Arizona 86322

Dear Chairman Kwail,

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We appreciate your continued interest.

Sincerely,

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Earl Stewart
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April 24, 2013

President Ernest Jones, Sr.
Yavapai-Prescott Indian Tribe
530 East Merritt Street
Prescott, Arizona 86301-2038

Dear President Jones, Sr.,

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We appreciate your continued interest.

Sincerely,

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April 24, 2013

Governor Gregg Shutiva
Pueblo of Acoma
P.O. Box 309
Acoma Pueblo, New Mexico 87034

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Navajo Liaison
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1300 W. Washington Street
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Governor Gregg P. Shutiva
Pueblo of Acoma
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NATIONAL PARK SERVICE
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NATIONAL MONUMENTS
6400 N. Highway 89,
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UNITED STATES FOREST SERVICE
COCONINO NATIONAL FOREST
1824 S. Thompson St,
Flagstaff, AZ 86001



April 24, 2013

Mr. James Garrison
State Historic Preservation Officer
Arizona State Parks
1300 West Washington
Phoenix, Arizona 85007

Dear Mr. Garrison,

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We appreciate your continued interest.

Sincerely,

Leah McGinnis
Acting Superintendent
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Earl Stewart
Supervisor
Coconino National Forest
United States Forest Service

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April 24, 2013

Chairperson Sherry Counts
Hualapai Tribe
P.O. Box 310
Peach Springs, Arizona 86434

Dear Chairperson Counts,

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Earl Stewart
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April 24, 2013

President Dr. Clinton Pattea
Fort McDowell Yavapai Tribe
P.O. Box 17779
Fountain Hills, Arizona 85269

Dear President Dr. Pattea,

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Earl Stewart
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April 24, 2013

Chairman Don Watahomigie
Havasupai Tribe
P.O. Box 10
Supai, Arizona 86435

Dear Chairman Watahomigie,

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Acting Superintendent
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Earl Stewart
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Hopi Tribe
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April 24, 2013

Mr. Leigh Kuwanwisiwma
Director, Hopi Cultural Preservation Office
The Hopi Tribe
P.O. Box 123
Kykotsmovi, Arizona 86039

Dear Mr. Kuwanwisiwma,

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We appreciate your continued interest.

Sincerely,

Leah McGinnis
Acting Superintendent
Flagstaff Area National Monuments
National Park Service

Earl Stewart
Supervisor
Coconino National Forest
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April 24, 2013

Chairman Manual Savala
Kaibab Band of Paiute Indians of the Kaibab Indian Reservation
HC 65, Box 2
Fredonia, Arizona 86022

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Flagstaff Area National Monuments
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Earl Stewart
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April 24, 2013

President Ben Shelly
Navajo Nation
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Window Rock, Arizona 86515

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We appreciate your continued interest.

Sincerely,

Leah McGinnis
Acting Superintendent
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Earl Stewart
Supervisor
Coconino National Forest
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Tribal Historic Preservation Officer
Navajo Nation
P.O. Box 4950
Window Rock, Arizona 86515

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Flagstaff Area National Monuments
National Park Service

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Supervisor
Coconino National Forest
United States Forest Service

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Chairman Ronnie Lupe
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1824 S. Thompson St,
Flagstaff, AZ 86001



April 24, 2013

Chairman Terry Rambler
San Carlos Apache Tribe
P.O. Box O
San Carlos, Arizona 85550

Dear Chairman Rambler,

On March 30, 2009 President Barack Obama signed into law the Omnibus Public Land Management Act of 2009 as passed by the United States Congress. Included in this Act is language directing the Secretaries of Agriculture and the Interior to conduct a Study of Management Options focused on the Walnut Canyon National Monument, managed by the NPS, and the area within the Peaks and Mormon Lake Districts of the Coconino National Forest, as noted on the attached map, managed by the Forest Service. The study area includes federal, state, and private land surrounding Walnut Canyon National Monument, comprises approximately 30,000 acres, and is ten miles east of Flagstaff, Arizona.

The Act directs the Walnut Canyon Study to focus specifically on the following topics:

- The suitability, and feasibility of designating all or part of the study area as an addition to Walnut Canyon National Monument
- Continued management of the study area by the Forest Service; or
- Any other designation or management option that would provide for (i) protection of resources within the study area; and (ii) continued access to, and use of, the study area by the public.

The National Park Service (Flagstaff Area National Monuments) and the US Forest Service (Coconino National Forest) are pleased to report the draft Walnut Canyon Study Area Report is in its final revision, before it is released to the public for comment. A number of management options and designations were explored through public involvement and an agency workshop. A total of eight options were initially developed. Five of those options subsequently were dismissed as nonviable. Three management options were considered viable, including:

- continuation of current management by the U.S. Forest Service
- congressional action establishing a special designation to the Study Area
- congressional restriction on sale or exchange of lands within the Study Area

As specified by the act, the National Park Service conducted a national significance assessment of cultural resources in the Study Area to determine the suitability and feasibility of designating all or part of the Study Area as an addition to Walnut Canyon National Monument. The assessment concluded that, while important resources exist outside the current monument boundary, they do not rise to the level of nationally significant as per the criteria for a National Historic Landmark.

This report contains no recommendations from the U.S. Forest Service and National Park Service with respect to a preferred management option for the entire Study Area. Rather, the final report will be

forwarded to the secretaries of the Department of Agriculture and Department of the Interior. The secretaries may forward the report's findings and any departmental recommendations to Congress.

It is anticipated the report will be available for public review and comment mid to late May for 60 days. We will be holding public meetings during the public review period with dates yet to be determined. Posting of the report will be found on the website: <http://www.walnutcanyonstudy.org>.

We encourage you to comment and/or attend the public meetings. However, we are also available to meet with you at your request about the Walnut Canyon Study prior to or after the public review of the report. Please contact the Chief of Resources for the National Park Service, Lisa Leap at (928) 526-1157 ext. 222 or via email at lisa_leap@nps.gov. You may also direct questions to the Forest Service by contacting Craig Johnson, Tribal Liaison for the Coconino National Forest at (928) 527-3475, or by email at cjohnson@fs.fed.us.

We appreciate your continued interest.

Sincerely,

Leah McGinnis
Acting Superintendent
Flagstaff Area National Monuments
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Earl Stewart
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April 24, 2013

Chairperson May Reston
President
San Juan Southern Paiute Tribe
P.O. Box 1989
Tuba City, Arizona 86045

Dear Chairperson Reston,

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We appreciate your continued interest.

Sincerely,

Leah McGinnis
Acting Superintendent
Flagstaff Area National Monuments
National Park Service

Earl Stewart
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April 24, 2013

Chairman Ivan Smith
Tonto Apache Tribe
P.O. Box 21
Clarkdale, Arizona 86324

Dear Chairman Smith,

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We appreciate your continued interest.

Sincerely,

Leah McGinnis
Acting Superintendent
Flagstaff Area National Monuments
National Park Service

Earl Stewart
Supervisor
Coconino National Forest
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IN REPLY REFER TO:

April 5, 2010

{Name and Address}

Dear {identical letters sent to Mailing List},

The National Park Service (Flagstaff Area National Monuments) and the US Forest Service (Coconino National Forest) are collaborating to begin a special resource study (Walnut Canyon Study) to explore management options for an area of the Coconino National Forest which surrounds the Walnut Canyon National Monument. This letter initiates formal consultation with tribes claiming cultural affiliation to the Flagstaff Area National Monuments and the Coconino National Forest, and encourages tribal participation throughout the Walnut Canyon Study process.

On March 30, 2009 President Barack Obama signed into law the Omnibus Public Land Management Act of 2009 as passed by the United States Congress. Included in this Act is language directing the Secretaries of Agriculture and the Interior to conduct a Study of Management Options focused on the Walnut Canyon National Monument, managed by the NPS, and the area within the Peaks and Mormon Lake Districts of the Coconino National Forest, as noted on the attached map, managed by the Forest Service. The study area includes federal, state, and private land surrounding Walnut Canyon National Monument, comprises approximately 30,000 acres, and is ten miles east of Flagstaff, Arizona.

The approximately 3,500 acres that comprises Walnut Canyon National Monument was established to protect ancient cliff dwellings and associated resources that are of great cultural, scientific, and educational value. The Monument contains concentrations of ancestral Puebloan habitation sites whose distribution and location are unusual, and include the only cliff dwelling architecture of the Sinagua culture. The Monument also contains natural and cultural resources that are known to be significant to contemporary native tribes. Ecological communities are shaped by topography that creates a rare compression of flora/fauna zones and contains high concentration of sensitive species. Visitors enjoy self-guided and ranger-led hikes on trails among the resources, as well as interpretive and educational opportunities at the visitor center.

The Coconino National Forest covers approximately 1.8 million acres in northern Arizona, ranging in elevation from 2,600 ft to 12,633 ft. The forest offers a wide variety of recreational opportunities, maintains approximately 600 miles of trails, 6,000 miles of forest roads, 10 designated wilderness areas, and is part of the largest ponderosa pine forest in the nation. Accommodating over 3.2 million visitors a year, Coconino National Forest is divided into four ranger districts. The area surrounding Walnut Canyon National Monument and identified in the Act is located within the Peaks and Mormon Lake Ranger Districts. Public uses of the area include a broad range of recreational activities such as camping, mountain biking, horseback riding, rock climbing, hunting, and hiking; as well as grazing and 4-wheel driving in some portions of this area.

The Act directs the Walnut Canyon Study to focus specifically on the following topics:

- The suitability, and feasibility of designating all or part of the study area as an addition to Walnut Canyon National Monument
- Continued management of the study area by the Forest Service; or
- Any other designation or management option that would provide for (i) protection of resources within the study area; and (ii) continued access to, and use of, the study area by the public.

Additionally, the Act specifies that the agencies must provide for public comment during the execution of the study, which is to include “*consultation with appropriate Federal, State, and local governmental entities.*”

Over the next several months, a study team will be gathering resource data, and ideas and concerns from stakeholders regarding the future management of this area. Three open houses will be held in Flagstaff, Arizona in April, 2010. The meetings are:

Monday, April 19 -- Fire Station 21, Kachina Village, 568 Kona Trail, 4:00 - 7:00 pm

Wednesday, April 21 -- Flagstaff City Lobby, 211 West Aspen Avenue, 4:00 - 7:00 pm

Thursday, April 22 -- Cromer Elementary School (commons), 7150 Silver Saddle Road, 4:30 - 7:00 pm

Additional information, along with a link for members of the public to provide comments, can be found on the website: <http://www.walnutcanyonstudy.org>.

We are available to meet with you at your request about the Walnut Canyon Study. We ask for identification of a single staff member who can be a point of contact with our staff. We recognize that a number of your staff may wish to comment on various aspects of the Walnut Canyon Study, and we encourage wide distribution of the information pertaining to the study. A single contact person, however, representing your office would make communication much easier.

Once an appropriate contact person has been identified, we would like to set up a meeting with your staff specialist to discuss issues of mutual concern related to the Walnut Canyon Study. We view coordination with your office and staff as crucial to this process.

Please contact the Chief of Cultural Resources for the National Park Service, Lisa Leap at (928) 526-1157 ext. 222 or via email at lisa_leap@nps.gov. You may also direct questions to the Forest Service by contacting Craig Johnson, Tribal Liaison for the Coconino National Forest at (928) 527-3475, or by email at cjohnson@fs.fed.us.

We appreciate your interest and hope that the process we are about to begin will better incorporate the concerns and interests of the tribes for the Walnut Canyon Study. Your input will play an important role in the direction of this special study and the future of the study area. We look forward to hearing from you.

Sincerely,

Diane Chung
Superintendent, Walnut Canyon National Monument

Earl Stewart
Supervisor, Coconino National Forest

Mailing List

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United States Department of the Interior
NATIONAL PARK SERVICE
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In Reply Refer To:

H4217

July 14, 2011

Addressee

Dear xxx:

The National Park Service (Flagstaff Area National Monuments (NPS)) and the US Forest Service (Coconino National Forest (USFS)) continue to collaborate in a special resource study (Walnut Canyon Special Resource Study) that was directed by President Barack Obama in the March 30, 2009 Omnibus Public Land Management Act. We are exploring management options for 30,000 acres of the Coconino National Forest which surrounds Walnut Canyon National Monument. "This is a follow-up letter to you regarding consultation on an area traditionally associated with the Flagstaff Area National Monuments and the Coconino National Forest that encourages tribal participation."

The NPS and USFS have enclosed the most recent newsletter regarding the Walnut Canyon Special Resource Study. Two newsletters have been produced during the public scoping process. The first newsletter was created to inform the public of the study underway, and to identify how the public can voice their opinions regarding the management of this area. The second newsletter reports on the results of the first round of public scoping and presents conceptual management options for public comment.

If you have any questions or comments, or would like to meet with us to discuss the study in more detail, please contact Lisa Leap at (928)526-1157x222 or at Lisa_Leap@nps.gov. Thank you for your continued interest.

Sincerely,

Diane Chung
Superintendent
Flagstaff Area National Monuments
National Park Service

Earl Stewart
Forest Supervisor
Coconino National Forest
United States Forest Service

1 enclosure