



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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Flagstaff Office, 3500 South Lake Mary Road, Flagstaff, AZ 86001-1043

January 29, 2002

Mr. Sam Henderson, Superintendent
Flagstaff Area National Monuments
National Park Service
6400 N. Highway 89
Flagstaff, Arizona 86004

Re: Draft General Management Plans/Environmental Impact Statements
Sunset Crater Volcano, Walnut Canyon and Wupatki National Monuments

Dear Sam:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the subject projects. It is obvious that production of these documents required an enormous amount of time and effort. We commend the National Park Service, and especially the Flagstaff Area National Monuments staff, on this endeavor.

We are pleased that the National Park Service is committed to cooperating with other state and federal agencies regarding resource management on lands adjacent to the monuments. We are also pleased that the management plan for Walnut Canyon National Monument and the Flagstaff Area Regional Land Use and Transportation Plan are in agreement with respect to expansion. Additional comments are provided in the attached documents, which are specific for each monument.

We look forward to working with you to finalize these documents and implement specific actions. If you have any questions or require additional information, please contact me at 774-5045.

Sincerely,

Debra C. Wright
Habitat Specialist

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cc: Bob Barsch, Wildlife Manager
Cari Lutch, Wildlife Manager
Larry Phoenix, Sector Supervisor
Jim Golden, Supervisor, Coconino National Forest
Kath Farr, Coconino National Forest

Enclosures

AN EQUAL OPPORTUNITY REASONABLE ACCOMMODATIONS AGENCY

COMMENTS TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
AND DRAFT GENERAL MANAGEMENT PLAN
WALNUT CANYON NATIONAL MONUMENT
Arizona Game and Fish Department
January 29, 2002

General The Department generally supports the selection of Alternative 2 for the management of Walnut Canyon National Monument, subject to the following comments:

Page 21 **Land Protection:** The Department supports the acquisition of the existing inholding within Walnut Canyon National Monument, subject to a willing property owner.

Page 33 **17** **Resource Analysis, 2nd paragraph:** The subject of this paragraph should be Walnut Canyon, not Wupatki National Monument.

Page 34 **18** **Management Zones:** The last sentence states that there are nine management zones applicable to Wupatki National Monument. However, there are only 7 management zones described. Again, the subject of the paragraph should be Walnut Canyon, not Wupatki.

Page 38 **Boundary Expansion Criteria:** The Department supports the position of not proposing a further expansion of the existing boundaries of Walnut Canyon National Monument. We also support the reevaluation criteria established to determine if a boundary expansion should be proposed in the future.

However, the Department continues to be concerned about proposals for boundary expansions through congressional action. We have stated during several meetings and in correspondence that we do not support expansion of National Monuments unless resource values can not be adequately managed by the adjacent land management agency (in this case, the U.S. Forest Service). We remain committed to this position.

A recent expansion proposal incorporates many sections of land managed by the U.S. Forest Service, based on watershed characteristics. Because this National Monument was established to protect substantial cultural resources in Walnut Canyon, we fail to understand the rationale for this expansion proposal. Unless significant cultural resources are located in the proposed expansion area, and those resources can not be adequately protected by the current land owner or management agency, we can not support this proposed boundary expansion.

Page 44 **19** **Alternative 2 (Preferred): Key Actions:** This alternative calls for three gates on the entrance road. We question the need for three, as it appears that one placed near I-40 and one placed on the south side of the entrance road at FR 303 would prevent entry to the monument while allowing legal cross-travel on FR 303.

Page 49 **MITIGATING MEASURES:** The Department is supportive of all listed mitigating measures.

Page 86 **20** **Park, 1st paragraph:** Great grey owls do not inhabit Arizona, however, great horned

20 owls are very common.

Page 87. **Park**, last paragraph: The Department notes that "the lands added by the 1996 boundary expansion have yet to be surveyed, fenced, and posted." We strongly encourage the National Park Service accomplish these three tasks as soon as possible. The Department is disappointed that protection of the significant cultural resources within the 1996 boundary expansion area has not occurred.

Page 88 **Park**, last paragraph: We expect that while the City of Flagstaff might approve a construction project, it would actually be a developer that might eventually acquire and develop the adjacent lands managed by Coconino National Forest and Arizona State Land Department.

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Page 95 **Park**, 1st column: This paragraph states that the former reservoir behind the Santa Fe Dam is almost entirely filled with sediment and that most of the local storm flows pass through the dam's spillway. The Department is concerned about the effects of sediment deposition on downstream vegetation in Walnut Canyon which may exacerbate impacts resulting from changes in the natural hydrology.

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In addition, we are concerned with the occurrence of noxious weeds behind the dam, which could migrate to the canyon bottom. The Department would encourage the National Park Service to initiate an aggressive program of noxious weed control and eradication.

Page 137 **Effects of the No-Action Alternative:** The Department strongly encourages the development of a new Fire Management Plan. We recommend that this information be included on page 39 under **Actions Common to All Alternatives.**

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Page 140-141 & Page 159-160 **Effects of Alternative 1:** This alternative proposes to upgrade and extend an existing road for approximately 3 ¼ miles along the northeastern canyon rim. Improving this road and providing a scenic drive along the northeast canyon rim may increase visitation to this area, thus vehicle and human noise and disturbance to sensitive plant and wildlife species. This disturbance could affect all species on the canyon rim and within the canyon, not just solitary wildlife species (as stated in the EIS). It has also been shown that some wildlife species such as deer, avoid areas within ¼ mile on each side of the road. Therefore, the area of impact would be over ½ mile wide on the rim, along with the disturbance to wildlife in the canyon itself. In addition, this road would cross several tributary channels that drain into Walnut Canyon, possibly introducing additional sedimentation to the hydrology of the system (see last paragraph of this section). The Department does not believe that closing the monument at night would mitigate many of the potential impacts to wildlife as a result of this action. Therefore, we recommend that this 3¼ mile improved scenic drive not be developed if this alternative is chosen.

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This section of the document also indicates that this proposed road would bisect one or more known wildlife movement corridors for elk and pronghorn between

25 Campbell and Anderson Mesas (page 30). While there may be some wildlife moving across the canyon (such as elk), we believe that most wildlife move east and west in the area between the monument and I-40.

26 This alternative also proposes to provide guided hikes to about ½ mile of the east canyon floor by scrambling down the steep canyon slopes. While the area of impact to the canyon bottom is relatively small, the Department is concerned that wildlife utilizing this narrow area will be negatively impacted by public recreation disturbance (see comments for page 143-144 & 160-161 below). Because wildlife may utilize Walnut Canyon year-round, the Department does not believe that closing the monument at night or closing the area during important breeding and/or migration seasons would mitigate the potential impact to wildlife as a result of guided hikes to the canyon floor. Therefore, we recommend additional mitigation measures be implemented if this alternative is chosen. We also recommend that specific mitigation measures be identified and analyzed subsequent to a formal decision on the General Management Plan or during the project-specific NEPA process. At that time, actions, methods, and timelines can be mutually developed

Page 143-144 & Page 160-161 **Effects of Alternative 2 (Preferred):** This alternative calls for improving approximately 1¼ miles of existing road to a staging area along the northeast canyon rim. While the wildlife impacts from this action would be similar to those discussed above (page 140-141 & 159-160), they would be of a lesser degree than those from Alternative 1. Wildlife would avoid areas within ¼ mile on each side of the road, and species on the canyon rim and within the canyon could be impacted, not just solitary wildlife species (as stated in the EIS).

27 Again, the Department does not believe that closing the monument at night would mitigate many of the potential impacts to wildlife as a result of this road upgrade. Therefore, we recommend that additional mitigation measures be implemented if this alternative is chosen. We also recommend that specific mitigation measures be identified and analyzed subsequent to a formal decision on the General Management Plan or during the project-specific NEPA process. At that time, actions, methods, and timelines can be mutually developed

This section of the document also indicates that this proposed road would bisect one or more known wildlife movement corridors for elk and pronghorn between Campbell and Anderson Mesas (page 30). While there may be some wildlife moving across the canyon (such as elk), we believe that most wildlife move east and west in the area between the monument and I-40.

This alternative also proposes to expand visitor use into the canyon through guided hikes along 2 miles of the canyon floor. The impacts from increasing the hiking distance from ½ mile (Alternative 1) to approximately 2 miles down the canyon will greatly increase the negative impacts from this Alternative. Species such as Mexican spotted owls, peregrine falcons, northern goshawks, bats, and other

27 raptors may utilize and/or nest in the canyon. In addition, bear, mountain lion, elk, mule deer, pronghorn, and turkey utilize Walnut Canyon for forage, water, cover, and as a movement corridor. Many of these species may use this area because it has been historically protected from human impacts and disturbance, other than occasional stabilization, monitoring, research or educational activities. Because wildlife may utilize Walnut Canyon year-round, the Department does not believe that closing the monument at night or closing the area during important breeding and/or migration seasons would mitigate the potential impact to wildlife as a result of additional disturbance along the canyon floor. Therefore, we recommend that public access to the canyon bottom not be expanded as described in Alternative 2.

Effects of Alternative 1: and Effects of Alternative 2 (Preferred): Both of these alternatives propose to expand visitor use into the canyon through guided hikes along the canyon floor. We are very concerned about potential impacts from recreation to the riparian vegetation and wildlife that utilize the canyon bottom (see above).

As previously stated, the Department is concerned that cattle grazing has been allowed to continue in 4 miles of the Walnut Canyon riparian corridor because of the lack of a fence. Some of the impacts to the riparian resources described in this document may be as a result of cattle grazing the canyon bottom, depending on the intensity and duration of the grazing activity. As stated above, we strongly encourage fencing the 1996 boundary as soon as possible to exclude livestock from the east canyon floor. However, we do not support reducing livestock impacts to the riparian vegetation in exchange for increasing the impacts from recreation. We also do not support relying on fencing the eastern park boundary (which should have been accomplished about 4-5 years ago as a matter of course) as mitigation for adverse impacts from recreational activities proposed under this management plan.

28 We are also concerned with encouraging recreation in the narrow bottom of Walnut Canyon because this activity could increase the potential for human/large predator interactions. These interactions may not be obvious to the recreationists or the park guides. However, repeated close proximity of the public to bears and mountain lions increase the chance of habituation by these species, leading to potential direct interactions with humans.

29 Another impact may be expected from dislodging soil and rocks while scrambling on the steep canyon slopes. This additional soil and rock material may damage or bury vegetation and increase sedimentation in the drainage. This may ultimately negatively impact the vegetation that is integral to the existing wildlife habitat in the canyon.

30 The Department does not agree that the potential cumulative adverse impacts to wildlife described above are minor. We also do not believe that the proposed mitigation actions are sufficient for this disturbance. Therefore, we request consideration of a combination of the two alternatives with appropriate mitigation (see above):

Comments to DEIS/General Management Plan
Walnut Canyon National Monument
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Improve approximately 1¼ mile of the existing primitive road to the staging area as proposed in Alternative 2. Provide guided hikes from the staging area to within ½ mile of the canyon bottom (as proposed in Alternative 1), and return on the same trail. Develop a hardened trail along the rim and steep slopes to eliminate dislodging soil and rocks caused by scrambling.

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Effects of Alternative 1: The Department is concerned about the determination that Alternative 1 will effectively protect sensitive plant and animal species. As stated above, this alternative would allow for negative impacts to occur to riparian plants and sensitive plants and wildlife species as a result of the scenic drive and guided hikes to the canyon bottom. The Department does not agree that these impacts would be mitigated by closure of the monument at night or closing the area during sensitive species breeding seasons. In addition, prohibiting public access to the remaining area of the monument does not effectively preclude disturbances or mitigate for the negative impacts to wildlife, riparian vegetation, and other sensitive plants that occur in Walnut Canyon. The value of riparian resources is considered to be much higher than those of upland vegetation.

Page 151
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Page 153

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Effects of Alternative 1: and Effects of Alternative 2 (Preferred): These sections of the document discusses actions that would occur in the event of "unfavorable mountain lion behavior." As you know, large predators such as mountain lions and bears utilize large areas of habitat. As such, the animals that utilize Walnut Canyon are probably not restricted to the canyon or the monument itself. The Department would very much like to cooperate with the National Park Service regarding management of wildlife that may move on and off the monument during their life cycle, including large predators. This cooperative effort would include a determination of the appropriate action, if any, in response to a human threat posed by a mountain lion or bear in the monument. We also request that the information in these two sections be modified to reflect this inter-agency cooperation.