BACK COVER FRONT COVER **INSIDE PAGE 1 INSIDE PAGE 2**

Standing With The Commission

Senator John McCain Senator Jeff Flake Congressman Paul Gosar Congresswoman Cynthia Lummis Congressman Mark Amodei Congressman Cresent Hardy Congressman Doug LaMalfa Congressman Glenn Thompson Congressman David Schweikert Congressman Scott Tipton Congressman Bruce Westerman Congressman Ryan Zinke Congressman Paul Cook Congressman Mike Kelly Congresswoman Aumua Amata Coleman Radewagen Congressman Daniel Webster Congressman John Culberson

Congressman John Fleming

Congressman Trent Franks

Congressman Louis Gohmert

Congressman Bob Goodlatte

Congressman Doug Lamborn

Congressman Tom McClintock

Congressman Steve Pearce

Congressman Matt Salmon

Arizona Speaker of the House

Congressman Don Young

David Gowan

Anglers United

1.2.3.Go...

Congressman Steve King

Archery Trade Association Arizona Antelope Foundation Arizona BASS Nation Arizona Big Game Super Raffle Arizona Bowhunters Association Arizona Chapter of Safari Club Arizona Council of Trout Unlimited Arizona Deer Association

Arizona Desert Bighorn Sheep Society Arizona Elk Society Arizona Flycasters Club Arizona Game and Fish Commission Arizona Houndsmen

Arizona Outdoor Sports Arizona Sportsmen for Wildlife Conservation

Arizona State Chapter of National Wild Turkey Federation Association of Fish and Wildlife

Association of Wildlife Conservation

Boone and Crockett Club **Bullhead City Town Council** Camp Fire Club of America Coconino Sportsmen

Congressional Sportsmen's Council to Advance Hunting and

the Shooting Sports

Dallas Safari Club Delta Waterfowl Foundation

Masters of Foxhounds Association Mohave County Board of Supervisors

Fredonia Town Council

Houston Safari Club

Mohave Sportsman Club Mule Deer Foundation

National Association of Forest Service Retirees

National Rifle Association National Shooting Sports Foundation

National Wild Turkey Federation North American Bear Foundation

Orion: The Hunter's Institute Outdoor Experience 4 All Quality Deer Management Association

Rocky Mountain Elk Foundation Ruffed Grouse Society Safari Club International

South Eastern Arizona Sportsmen's Club SRT Outdoors

The BASS Federation Tread Lightly!

Tusayan Town Council U.S. Sportsmen's Alliance Whitetails Unlimited

Wild Sheep Foundation Wildlife Management Institute

Williams Town Council **Xtreme Predator Callers**

Stop and consider: A"monument"al mistake?

> Why the Arizona Game and Fish Commission objects to a proposal to create the Grand Canyon Watershed National Monument.



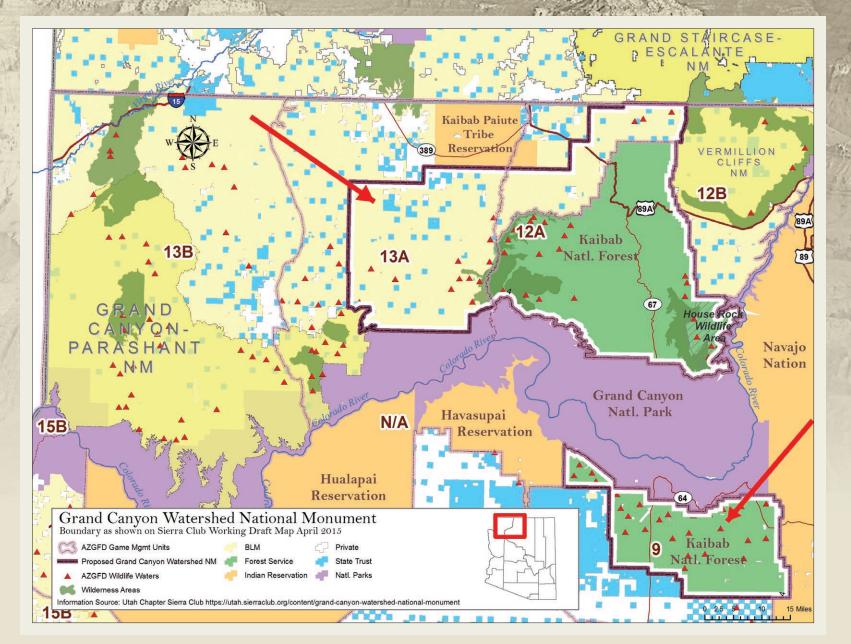
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"Wildlife and its habitat cannot speak, so we must and we will."

- President Theodore Roosevelt

Several environmenta organizations, along with members of the Arizona congressional delegation (Representatives Kirkpatrick, Grijalva and Gallego), are advocating for designation of a new 1.7 million-acre Grand Canyon Watershed National Monument on two areas adjacent to Grand Canyon National Park (arrows, map right). Most lands within the proposed monument are managed by the Bureau of Land Management (BLM) and U.S. Forest Service (USFS) in a multiple-use framework.



INSIDE PAGE 3 INSIDE PAGE 4 INSIDE PAGE 5 INSIDE PAGE 6

Proponents have identified various justifications for monument designation. How do they stand up?



Old-growth forests are threatened by commercial logging.

FACT: The greatest threat to old-growth forests on the proposed monument is catastrophic wildfire.



Commercial-scale logging of old-growth in Arizona ended in the 1990s, following administrative and legal challenges. These challenges also curtailed mechanical thinning on USFS lands within the proposed monument, setting the stage for unnaturally large, intense, and destructive wildfires.

One such event (Warm Fire, 2006) has already occurred within that area. Designation may make it difficult or impossible to implement needed forest restoration projects, including mechanical thinning, before another major wildfire occurs.



Wildlife movements (connectivity) are at risk.

FACT: Areas within the proposed monument are currently protected and managed to provide the largest block of unfragmented wildlife habitat in Arizona. Impediments to wildlife movements are highly localized and typically associated with major transportation corridors and associated fencing. The Arizona Department of Transportation, Arizona Game and Fish Department, land management agencies, and

others are already working to mitigate these barriers.



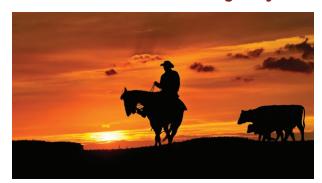
Off-highway vehicles (OHV) pose a significant threat to the area.

FACT: Cross-county off-road travel is already prohibited, with limited exceptions for fuelwood harvest and recovery of legally-taken big game animals. OHV use is restricted to designated roads/routes and managed by BLM and USFS under the Travel Management Process, an adaptive framework that can address future concerns and management needs.



Inappropriate levels of livestock grazing are disturbing fragile ecosystems.

FACT: Livestock grazing within the proposed monument is managed by BLM and USFS. Herd size, seasons, and



levels of use are specified by the management agency and adjusted to address resource needs and changing conditions. Grazing permits on two large allotments within or adjacent to the proposed monument are held by an environmental group (Grand Canyon Trust) dedicated to sustainable management.



Public lands in the proposed monument area lack sufficient protection under current federal regulations) protection.

FACT: Extensive tracts of public land proximate to or within the proposed monument are already protected by special designations. These include the Grand Canyon Game Preserve (600,000 acres), eight national parks/monuments (4.9 million acres) and nine wilderness areas (400,000 acres). Management of BLM and USFS lands within the proposed monument is driven by current resource management plans incorporating extensive public involvement, the best available science, and expertise provided by the Arizona Game and Fish Department.

What are the concerns and potential consequences of monument designation?

The new monument would add to a system the federal government is already struggling to maintain. The current estimated shortfall in deferred maintenance at existing national parks and monuments is \$11.5 billion; Grand Canyon National Park is 5th on that list with backlogged projects totaling \$330 million. If the federal government cannot efficiently operate and maintain a world-class national park of 1.2 million acres, how can adding 1.7 million more acres be financially prudent?

Designation will add new layers of bureaucratic process and delay needed management actions. Once designated, the federal agency responsible for the monument will need to develop a new resource management plan, a process that took 11 years on another recently designated Arizona monument. Important actions could be placed on hold until the plan is complete and has withstood potential administrative and legal challenges.

Designation will impede proactive and effective management of wildlife populations and habitats within the monument.



Wildlife management activities on included federal lands will require more complex planning by agencies that are already understaffed, and will face challenges from elements of the public who oppose active management in "protected" areas. Wildlife captures/ translocations, maintenance/ development of water sources, and habitat restoration projects may be delayed or prohibited, impeding the

state's ability to meet its trust responsibilities and diminishing state wildlife management authorities.

The proposed monument includes some of the most important hunting areas in the United States, including the iconic Kaibab deer herd, portions of the Arizona Strip that produce trophy mule deer, and areas south of the Grand Canyon known for trophy bull elk. Over time, an inability to properly manage these populations and their habitats may result in decreased populations, reduced hunter opportunities and loss of revenues that directly support conservation and local communities.

Monument designation sets the stage for future, more restrictive designations, further impeding public access, hunting, and management flexibility. Areas within the new monument that are



determined to have "wilderness characteristics" would face activity restrictions similar to designated wilderness areas. USFS and BLM lands within the new monument could also be transferred to the National Park Service, in which case that agency's narrower mission and greater restrictions on management and recreational activities would apply. A majority of national parks in Arizona were

previously designated as national monuments.

Designation under the Antiquities Act disenfranchises stakeholders and deprives local communities a voice in the process. Designating a new monument via unilateral executive order undermines extensive prior collaboration, agency planning, and public support for existing management of this area.