



April 6, 2021

Jennifer Fox, Ecologist
Grand Canyon - Parashant National Monument
345 East Riverside Drive
St. George, UT 84790

Re: **Shiwits Plateau Landscape Restoration Project (LRP)**
(DOI-BLM-AZ-A030-2021-0005-EA)

Dear Ms. Fox:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. We have 40 member, affiliate and associate groups that reach across the spectrum of wildlife conservation, hunting, angling, shooting, outdoor recreation groups, and businesses from across Arizona. Our member groups represent over 16,000 people from Arizona.

AZSFWC appreciates the opportunity provide scoping comments on an Environmental Assessment (EA) for the Shivwits Plateau Landscape Restoration Project (project), located within the Grand Canyon-Parashant National Monument (GCPNM), Mohave County, Arizona. Areas covered by this EA provide habitat for a diverse array of wildlife species, both game and nongame, as well as hunting and non-consumptive, wildlife-oriented recreational opportunities for Arizona residents as well as outdoor recreationists from across the United States. After reviewing the scoping package, we offer the following comments for consideration by the project planning team and Monument manager.

Overall, the project presents significant opportunities to benefit wildlife habitat and populations, goals our organization strongly supports. However, the preliminary project summary is inconsistent, extremely vague in some respects, but detailed in others. This leaves considerable ambiguity about the proposed actions while implying that a small subset of those will be priority elements of project. Such uncertainty can create some apprehension with the public about an otherwise good project. We strongly recommend that the Monument prepare a revised and more complete project description and Proposed Action that addresses the following specific elements:

1. Description of the Project Area – the provided maps and net acreage do not provide an adequate picture of the affected areas. The Monument needs to provide an acreage breakdown by plant community type and the intended treatment acreage, by treatment type, within each.

AZSFWC comments supporting the GCPNM Shivwits Plateau LRP – 4-6-2021

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2. Criteria for Prioritizing and Applying Treatments – the project encompasses a large area with a diversity of ecosystems and management needs/opportunities, that will likely exceed the available resources. We encourage GCPNM to work with Cooperating Agencies and other partners to develop a strategy for prioritizing and implementing work done under this project.
3. Ponderosa Pine Forest – more clarity and detail is needed for this element of the project. The preliminary proposed action indicates that prescribed fire would be the primary treatment within this community type and would follow preparatory manual or mechanical treatments. However, the relevant sections for those treatments do not mention ponderosa pine or specific approaches that would be used within that type. The Mt. Trumbull restoration project clearly demonstrated the need to reduce excess fuels prior to reintroduction of fire, and the adverse consequences (e.g., explosive establishment of cheatgrass) that can occur when that is not done properly. Finally, we recommend that GCPNM incorporate relevant current science, including specific work done on Mt. Trumbull by the NAU Ecological Restoration Institute and Arizona Game and Fish Department (AZGFD), as well as social license developed through current restoration efforts in other northern Arizona ponderosa pine forests (e.g., the Four Forest Restoration Initiative and Black River Restoration Project).
4. Pinyon-Juniper Woodlands – the revised Proposed Action and draft EA need to recognize the different woodland types that are present and identify treatments that are appropriate for each. Specifically, it is important to distinguish among persistent woodlands versus those that represent encroached grasslands or areas of woodland expansion/contraction. Old-growth persistent woodlands have unique wildlife habitat value that should be fully conserved as much as possible. Treatments within the pinyon-juniper type should avoid the historical practice of large scale mechanical clearing and seeding with non-native species. These treatments are controversial, have dubious benefits to wildlife, are inconsistent with the Purpose and Need for the project, and opposed by our organization. To maximize benefits to game and nongame species, mechanical treatments should be strategically applied in a manner that mimics small-patch natural disturbances -- creating openings that allow developed understory layers. A potential strategy would be to delineate blocks <640 acres in size, within which up to 25% of the area would receive dispersed, irregularly shaped treatment patches <5 acres in size. This would increase habitat heterogeneity, allow efficient implementation, and provide added protection for cultural resources.

Treatment is also appropriate where pinyon and juniper have encroached into sagebrush stands or are moving down slope into shrub-grassland, savannah, and grassland areas. In these areas, the goal should be to thin or remove encroaching trees but retain pockets of persistent woodland that may be interspersed on shallower/rocky soils.

From a nongame perspective, the project area likely provides habitat for the pinyon jay, a species of emerging conservation concern. We encourage GCPNM to adopt current recommendations developed by the Pinyon Jay Working Group facilitated by the U.S. Fish and Wildlife Service.

AZSFWC comments supporting the GCPNM Shivwits Plateau LRP – 4-6-2021

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5. Sagebrush Shrublands – decadence and lack of regeneration is a serious concern in sagebrush communities on the Arizona Strip, including GCPNM. A related concern is the loss of sagebrush to recurring wildfire and invasion by cheatgrass and other exotic weeds. We support active intervention to rejuvenate and restore these areas, which provide habitat for a diversity of wildlife. That said, we are concerned that the current project description opens the door for large-scale herbicide applications intended to kill sagebrush and increase forage for domestic livestock. The resulting simplified plant communities have negligible habitat value for wildlife, and in many places on the Arizona Strip, have converted to monocultures of cheatgrass and other invasive weeds following wildfire and/or excessive livestock use. These are unacceptable outcomes that are inconsistent with the Purpose and Need for the project and opposed by our organization.
6. Application of Fire – prescribed fire is an important tool that can be used to accomplish a variety of project objectives. However, this must be done in a manner that does not facilitate further spread and dominance by cheatgrass and other invasive weeds and protects fire-sensitive plant communities like blackbrush that have been severely impacted by wildfires across the Arizona Strip. We also recommend that managed wildfire (natural or anthropogenic ignitions) should be included in the toolbox along with prescribed fire.
7. Herbicide Treatments – this is a potentially controversial element of the project; however, the purpose of these chemical treatments is not clearly established. Chemical treatments are effective tools for controlling invasive plants and in some cases, stimulating habitat diversity and productivity by reducing dominance by woody plants. In the latter situation, treatments should strive to create mosaics or small patches that mimic natural disturbance/succession. Wherever herbicides are used, care must be taken to avoid mortality of woody browse and other native forage plants important to wildlife.
8. Wildlife Corridors – we understand that portions of the project area may include migration/movement corridors used by mule deer and could qualify for funding under DOI Secretarial Order #3362. We ask the Monument to work with the AZGFD to identify these corridors and prioritize them for treatment where needed.
9. Seeding – seeding is a valuable tool where the existing plant community has been depleted of desirable species. We support this approach and recommend using locally-adapted seed of native species. Use of non-natives should be limited to situations where ecological objectives in the Purpose and Need cannot be met using available native seed. The project area presents a challenging environment for successful seeding, particularly under the ongoing drought and a changing climate. GCPNM should use seeding practices that will maximize potential for success, including one or more years of post-seeding rest from grazing, when treatments occur in active livestock allotments.
10. Cooperating Agencies – AZSWFC understands that the AZGFD has requested Cooperating Agency status for this NEPA analysis. We strongly recommend their request be granted to fully leverage their expertise in planning and implementing the project.

AZSWFC comments supporting the GCPNM Shivwits Plateau LRP – 4-6-2021

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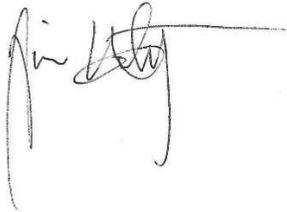
11. Public Engagement – AZSFWC supports active management on public lands with Special Designations, including Monuments like GCPNM. However, we also understand projects like this will be sensitive among some members of the public so we believe increased outreach might be prudent. We recommend that the GCPNM provide opportunities for on-the-ground public engagement during the NEPA planning process and in the future as the project is implemented. We would welcome the opportunity to participate in field trips or similar events.

12. Feral Burros – these animals are present within or adjacent to the planning area and could compromise attainment of some project objectives. We request they be included as an issue in the NEPA analysis and that GCPNM continue efforts to remove all burros from the Monument.

AZSFWC and 26 of our member organizations (list attached) support the GCPNM efforts in this restoration project proposal. We also appreciate your consideration of our input and look forward to further engagement as the project moves forward.

Thank you!

Yours in Conservation,

A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht
Executive Director

Cc: Mark Wimmer, GCPNM Manager



AZSFWC Member Organizations Supporting the Shivwits Plateau Landscape Restoration Project

Anglers United
AZ Antelope Foundation
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Bowhunters Association
AZ Chapter Backcountry Hunters and Anglers
AZ Chapter National Wild Turkey Federation
AZ Chapter Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Elk Society
AZ Flycasters Club
AZ Houndsmen's Association
AZ Outdoor Adventures
AZ Outdoor Sports
Christian Hunters of America
Mohave Sportsman Club
Outdoor Experience 4 All
South Eastern AZ Sportsman Club
Southern AZ Quail Forever
Southwest Wildlife Foundation
SRT Outdoors
The BASS Federation
Theodore Roosevelt Conservation Partnership
Valley of the Sun Quail Forever
Yuma Valley Rod and Gun Club

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