



July 2, 2021

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

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

Submitted electronically: <https://eplanning.blm.gov/eplanningui/project/2012289/510>

Dear Ms. Fox:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat improvement, hunter recruitment/retention, and educating sportsmen and women 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 comments on the draft 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.

AZSFWC sincerely appreciates extensive additions to the EA in response to input provided by our organization and other stakeholders. We also thank GCPNM for working closely with the Arizona Game and Fish Department (AGFD), who served as a cooperating agency. This is without question one of the most comprehensive and well-prepared EAs we have seen in recent years. We offer the following additional recommendations for inclusion into the final EA, where appropriate.

Description of the Project Area – thank you for providing the requested maps and acreages by treatment type. These provide a comprehensive and readily understood picture of the proposed activities. The photos of example treatment areas are most helpful. Overall, the quality of the maps and depth of supporting information is exceptional for a NEPA planning document.

AZSFWC comments supporting the GCPNM Shivwits Plateau LRP EA – 7-1-2021

Arizona Sportsmen for Wildlife Conservation  
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Criteria for Prioritizing and Applying Treatments – while not stated in the draft EA, we understand that GPCNM will be working closely with AGFD in prioritizing and implementing on the ground work. AZSFWC appreciates this collaborative approach. We note that it would be helpful for the final EA to indicate the expected duration of the project.

Ponderosa Pine Forest – the draft EA provides additional needed clarity on the application of various treatments within this type. We request that the final EA include language indicating that large, old ponderosa pine trees (which are particularly important to wildlife and greatly valued by monument visitors) will not be removed during manual treatments.

Pinyon-Juniper Woodlands – given the extent and importance of these woodlands in GPCNM, we particularly appreciate additional information provided in the EA and the detailed response to AZSFWC recommendations provided during scoping. The combination of vegetation types and Ecological Site Descriptions provides an effective crosswalk to the woodland classifications (persistent, encroached grassland, expansion/contraction) suggested in our scoping comments. Proposed treatment assignments for these types are likewise appropriate to their natural disturbance regimes and current/desired conditions. The proposed mosaic approach (Appendix C, Fig. C.8) is similar to our recommendation, though the amount of treated area is considerably greater. If circumstances permit, we encourage GPCNM to include some treatment units with a larger proportion of untreated woodland (e.g., 50%) and include them in post-treatment monitoring. We also note and appreciate that the EA includes cutting criteria for pinyon and juniper that should effectively retain old growth trees.

The draft EA provides useful information on the pinyon jay, a species of emerging conservation concern that occurs on the project area. AZSFWC recommends that the final EA incorporate the most current information and recommendations for this species, as outlined in the Partners in Flight "*Conservation Strategy for the Pinyon Jay (Gymnorhinus cyanocephalus)*" which can be found at:

<https://partnersinflight.org/resources/conservation-strategy-for-pinyon-jay/>

Sagebrush Shrublands – we appreciate and support the proposed treatment approaches for this plant community type and clarification that the project will not include broadcast application of tebthiuron to kill sagebrush.

Application of Fire – we now understand that managed wildfire is covered under the 2008 GPCNM Resource Management Plan and can be used on the project. We appreciate clarification that blackbrush communities will not be treated with prescribed fire.

We likewise appreciate that potential spread on invasive weeds following prescribed fire was brought forward as an issue from scoping. The proposed adaptive management approach (from the NPS Fire Monitoring Handbook) provides a robust framework for moving forward with this element of the project. AZSFWC strongly supports this measured deployment and recommends that initial units in pinyon-juniper be representative of variation within that type to the extent possible, and on the smaller side of those available for prescribed fire treatment.

Herbicide Treatments – thank you for providing the requested clarity on the extent and objectives of chemical treatments. The proposed focus on non-native invasive plants is appropriate to the project objectives. In the final EA, it would be helpful to indicate if there

is a mechanism by which new herbicide products that are not included in the cited 2007 EIS could be used in the future.

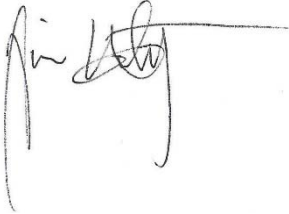
Wildlife Corridors – thank you for your coordination with AGFD in addressing this potential concern.

Public Engagement – AZSFWC understands that Covid-19 and other factors precluded field trips during the planning process for this project. We encourage GPCNM to consider future trips during implementation if there is sufficient stakeholder interest.

Feral Burros – we appreciate consideration of feral burros as an issue in the NEPA analysis. While outside the scope of this EA, we strongly encourage GPCNM to ensure that these animals do not become established on the project area.

In summary, we thank you for such thorough consideration of the input we provided during scoping. AZSFWC and 27 of our member organizations (list attached) strongly support the proposed project. It will benefit monument ecosystems, wildlife, and visitors for decades to come.

Yours in Conservation,

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

Jim Unmacht  
Executive Director

Cc: Mark Wimmer, GPCNM 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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