

About a National Conservation Area in the Walnut Canyon Study Area

Goals of National Conservation Areas

“National Conservation Areas (NCAs) are designated by Congress to conserve, protect, enhance, and manage public land areas for the benefit and enjoyment of present and future generations. NCAs feature exceptional natural, recreational, cultural, wildlife, aquatic, archeological, paleontological, historical, educational, and/or scientific resources.” The defining quotation is from the website of the Bureau of Land Management, which administers fourteen National Conservation Areas. Three of those NCAs are in Arizona: Gila Box Riparian, Las Cienegas, and San Pedro Riparian. Any federal land management agency may administer a National Conservation Area.

How does the Walnut Canyon Study Area qualify as an NCA?

That is, what are the “exceptional resources”?

Natural resources. Walnut Canyon *per se* is an exceptional geologic feature. The canyon provides striking views both from the top and especially from the bottom. The transition from the “fossil sand dunes” of the Coconino sandstone to the chalky layers of the Kaibab limestone stands out vividly. Moreover, the canyon provides exceptional habitat for peregrine falcons and spotted owls.

On some tracts in the Study Area, large ponderosa pines stand, widely separated, on a grassy understory. Those tracts resemble the old growth forest of the 1800s and provide an encouraging sense of what the forest all around Flagstaff may look like again.

Finally, the Study Area protects the watershed of Walnut Creek (downstream of Lower Lake Mary). According to the National Park Service, such protection commands a high priority for the long-term environmental health of Walnut Canyon National Monument.

Recreational resources. The Study Area provides national forest adjacent to Flagstaff’s Urban Growth Boundary. The Campbell Mesa trail system has become highly popular (since its creation in 2002). Both the Arizona Trail and the Flagstaff Loop Trail pass through the Study Area.

Wildlife resources. As mentioned above, the canyon provides exceptional habitat for peregrine falcons and spotted owls. Goshawks and mountain lions live in the Study Area. Flagstaff Pennyroyal (*Hedeoma diffusum*), a relatively rare endemic plant, thrives at numerous sites in the Study Area.

Archeological resources. The number and quality of archeological sites on the Forest Service land is typical of many areas on the Coconino National Forest. Thus, those sites are *not* exceptional. But the Forest Service land provides a protective buffer for Walnut Canyon National Monument, whose archeological resources are exceptional and of national significance.

May the Forest Service administer an National Conservation Area?

Yes. Here is a list of positive evidence.

1. The Forest Service itself suggested an NCA in September 2002 (with itself as administrator).
2. I asked Tom Robinson at the Grand Canyon Trust in 2002; he said that the Forest Service may administer an NCA.
3. In an absolutely fundamental sense, Congress sets the boundaries of special federal areas, chooses their names, and selects their administrators. Congress has the authority to establish an NCA in the Study Area and to assign administration to the Forest Service.
4. Note that, currently, the Forest Service manages many areas that are *not* part of a National Forest. The Forest Service administers six National Monuments and more than 20 National Recreation Areas. It also administers “Special Management Areas” and “National Protection Areas.”
5. Historically, the Forest Service managed Walnut Canyon National Monument for the first 18 years of the Monument’s existence. Sure, the Forest Service may manage areas other than National Forests.
6. Congress has assigned management of National Monuments to five different federal agencies: the Forest Service, BLM, Fish & Wildlife Service, NOAA, and the National Park Service. It has assigned management of National Recreation Areas to three federal agencies: Forest Service, BLM, and NPS. There would be nothing novel about Congress’s assigning management of an NCA to the Forest Service (as well as assigning management of NCAs to the BLM).

Notes by Ralph Baierlein