



August 8, 2016

Annette Fredette, 4FRI Planning Coordinator  
Coconino National Forest  
1824 S. Thompson St.  
Flagstaff AZ 86001

Re: Scoping comments on the 4 FRI Rim Country Proposed Action (June 2016).

Dear Ms. Fredette:

The Arizona Elk Society is one of the largest state Wildlife Conservation Organizations that works very close with Arizona Game and Fish and the USFS to enhance and restore wildlife habitat for elk and other wildlife. We do this through partnerships, with funds raised by the AES and through the hard work of our hundreds of volunteers. With over 2500 members and supporters that rely on the multiple use of the forest we are glad to comment on this Scoping.

We are encouraged with this phase of 4 FRI in that you have identified riparian areas, streams and springs that need to be worked on in conjunction with the tree thinning. In your analysis you identified the springs and riparian areas and the human caused issues related to the damage and reduced functioning. But you left out the fact that overgrown forests have limited the amount of water and runoff available due to the needs of the trees and overgrowth. The AES has been very successful in showing that reducing the conifers and junipers in areas of springs, streams and riparian creek has resulted in the increase in water. Also if you reduce water stealing trees you increase watershed and need to improve riparian areas and creeks, that are currently damaged, to protect them from further damage.

Please consider the following comments on the June 2016 Four Forest Restoration Initiative (4FRI) Rim Country EIS Proposed Action.

1. **Project Objective, Purpose and Need:** AES supports the objective of the Rim Country Proposed Action “to reestablish and restore forest structure and pattern, forest health, and vegetation composition and diversity in ponderosa pine ecosystems to conditions within the natural range of variation, thus moving the project area toward the desired conditions.” We further support the Purposes and Needs stated for the Proposed Action to:

- Increase forest resiliency and sustainability;
- Reduce risk of undesirable fire effects;
- Improve terrestrial and aquatic species habitat;
- Improve the condition and function of streams and springs;
- Restore woody riparian vegetation;
- Preserve cultural resources;
- Support sustainable forest products industries

1. **Increase and broaden the wildlife focus** – The AES would like to see the Proposed Action include a broader scope of wildlife habitat restoration needs and actions not just those benefitting federally protected species. Many Arizona sportsmen utilize and depend on the project area for a quality hunting and fishing experience. Hunting and Fishing is an important part of the multiple use of the Forest. A recent state-wide survey conducted by the Arizona Game and Fish Department indicates that the project area includes some of the State’s mostly highly valued hunting and fishing areas for elk, deer, turkey, trout, and pronghorn antelope (see: [www.azgfd.com/Recreation/ValueMapping](http://www.azgfd.com/Recreation/ValueMapping)). Hunting and fishing for these species are economically and socially important to local and neighboring communities. As such, we recommend that the Purpose and Need should be expanded to include “Support quality hunting and fishing opportunities”. The proposed action and treatments should emphasize actions that will improve terrestrial and aquatic habitat conditions, maintain/restore functioning wildlife migration corridors, and provide reasonable access. In addition, the Proposed Action should address increasing wildlife diversity by increasing spatial heterogeneity of habitat components for both aquatic and terrestrial wildlife.
  
2. **Emphasize wildlife waters** - Many wildlife waters (including tanks, water collection aprons, drinkers, etc.) in the project area have been degraded or are no longer functioning due to damage from catastrophic wildfire or lack of maintenance. These waters need to be repaired (i.e., sediment removal) or replaced. For waters that are exclusively wildlife waters, exclusion fencing may need repair or replacement to keep livestock out. There are other areas of wildlife habitat that have been identified for the installation of new waters. These repairs, replacements, and installations will improve habitat for wildlife and improve wildlife distribution across the landscape.
  
3. **Emphasize wildlife connectivity and migration corridors.** An objective of the Proposed Action should be to create and restore wildlife corridors through thinning to connect wildlife habitat blocks on the landscape. For example, emphasis should be placed on mechanical treatments that will maintain and/or restore montane meadow connectivity through the removal of trees, including juniper and large young trees where wildlife travel corridors have been identified.  
  
Within the Rim Country project area, fence improvements and modifications would benefit wildlife through increasing wildlife connectivity on the landscape. For example, unnecessary fences need to be removed to allow wildlife to move through important movement corridors between habitat blocks. There are also other fences that require repair to keep livestock within allotments and protect sensitive wildlife resources. Wildlife would also benefit from wildlife friendly modifications to other fences that would retain livestock while allowing wildlife to cross.
  
4. **Clarify the decommissioning roads will be done pursuant to approved Travel Management Rules (TMR)** - Decommissioning of roads should be done in accordance with approved TMR’s process not the Rim Country EIS. Page 5 (Roads) indicates that “there is a need to decommission unneeded routes identified during the forest Travel Management Rule review processes as part of the restoration of the landscape in the project area.” However, page 14 indicates that the Proposed Action will:

- Decommission approximately 230 miles of existing system and unauthorized roads on the Coconino and Apache-Sitgreaves National Forests.
- Decommission approximately 20 miles of unauthorized roads on the Tonto National Forest.
- Improve approximately 150 miles of existing non-system roads and construct approximately 350 miles of temporary roads for haul access; decommission when treatments are completed.
- Relocate and reconstruct existing open roads adversely affecting water quality and natural resources, or of concern to human safety.

It's unclear whether these proposed actions are authorized in approved TMR's.

5. **Emphasize and expand the scope of stream restoration actions.** The project area includes numerous streams that support some of the most productive trout fisheries in the state and contribute to Arizona's vital water supplies. The project area is home to native Gila and Apache trout that are important from both a conservation and recreational perspective. The proposed forestry restoration combined with thoughtful hydrologic rehabilitation can produce resilient, sustainable and highly functioning watersheds that supports both native and recreational fisheries. All perennial, ephemeral, or intermittent streams (not just those identified in Figure 6, page 19) should be eligible under the EIS to receive restoration and or improvements, if needed. Not all these streams may need restoration or special treatment, but the EIS should provide the necessary compliance if restoration or special treatment is deemed appropriate. Prior to mechanical or fire restoration treatments, the hydrologic impacts of the treatment to streams, aquatic ecosystems, and riparian areas should be formally evaluated. Treatments should be adjusted to avoid or mitigate adverse impacts.

Thank you for considering these comments and for all the hard work of the 4FRI EIS team to work collaboratively with stakeholders to prepare the Rim Country EIS. The Arizona Elk Society is very encouraged to be part of this phase due to the inclusion of the rest of the ecosystem improvements. Please contact me if you have questions or need additional information.

Yours in conservation,



Stephen Clark  
Executive Director,  
Arizona Elk Society

cc Larry Voyles, Director, Arizona Game and Fish Department