



**Douglas A. Ducey**  
Governor

# Office of the State Forester

## Arizona State Forestry



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**Re: Arizona State Forestry Comments on the 4FRI Rim Country Proposed Action**

To Whom It May Concern:

The State of Arizona Department of Forestry and Fire Management is writing to comment on the 4FRI Rim Country Proposed Action. Overall, we are proud to contribute as a partner, collaborator and stakeholder in the 4FRI process and feel that the Proposed Action is a solid, well developed document. We have two concerns regarding issues that were not addressed in the Proposed Action: biomass utilization and disposal; and the utilization and disposal of the Pinon and Juniper. Both of these issues are opportunities and obstacles, but should be considered in all phases of the 4FRI projects. We do not feel that either of these issues are insurmountable to successful implementation, but would like to see a wide range of options for utilization and disposal addressed in the alternatives in the Environmental Impact Statement. These issues will have a direct impact on the project's success and economical feasibility.

We recognize that economically viable biomass utilization, in the quantity addressed in the Proposed Action, is a challenging issue that affects engaging and attracting industry to Arizona and this project. We strongly support the 4FRI goal of an engaged industry being able to cover all or nearly all of the costs of removal of forest restoration byproducts by the use and sale of the products removed. There are serious concerns that if complete biomass removal is mandatory, the burden on the Forest Products Industry will be too great to overcome. We would like to recommend a wide range of options be considered in the alternatives that relates to the issue of biomass that would allow for biomass removal where economically feasible but would also allow other options to dispose of uneconomically feasible biomass

We are similarly concerned about the economic viability of the more than 111,000 acres of Juniper and Pinon Juniper woodlands identified within the Rim Country project area. We are in favor of the goals and desired future conditions of the grassland and meadow restoration identified in the Proposed Action. We recognize the need to mechanically treat in these cover types to achieve the restoration goals, but have concerns about the lack of existing markets and the low value of the material generated by treatments being able to overcome the expense of mechanical treatments in these woodland cover types.

**Duty ♦ Respect ♦ Integrity**

Ultimately, we would like to see as many options available to limit constraints on the Forest Products Industry that might prevent, limit or delay the successful implantation of the 4FRI Rim Country Proposed Action. Thank you for your consideration of our comments and we look forward to continuing to work together to find economically viable solution to forest restoration and resiliency in Arizona.

Very truly yours,



Aaron Green  
District Manager-Northern District  
Arizona Department of Forestry and Fire  
Management