



**DESERT FLY CASTERS**  
FLY FISHING CLUB

P.O. BOX 6404  
CHANDLER, AZ 85246

August 11, 2016

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

By email: [4FRI\\_comments@fs.fed.us](mailto:4FRI_comments@fs.fed.us)

CC: [afredette@fs.fed.us](mailto:afredette@fs.fed.us)

Re: Desert Fly Casters scoping comments on the Rim Country Proposed Action.

Dear Ms. Fredette;

The Desert Fly Casters club is a long time non-profit representing fly fishers in the Phoenix metropolitan area and throughout Arizona. Our mission is to advance the sport of fly fishing in Arizona through education, conservation and community outreach including by: Committing to conserve, restore and enhance local and regional fisheries.

We welcome the opportunity to comment on the 4FRI Rim Country Project EIS Proposed Action. We have worked for many years on many conservation projects in the state with the Arizona Game and Fish Department, the White Mountain Lakes Foundation, Trout Unlimited and other fly fishing organizations in the state. We are an International Federation of Fly Fishers affiliate.

We have reviewed the June 2016 Proposed Action and support the objective of the Rim Country Proposed Action "to reestablish and restore forest structure, ... forest health, ... and diversity ..., thus moving the project area toward the desired conditions." We further support the Purposes and Needs stated for the Proposed Action, especially 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; and
- Restore woody riparian vegetation.

We are also familiar with and in support of comments being submitted by the Arizona Trout Unlimited organization, and we routinely receive briefing reports from the Arizona Game and Fish Department such as on their Coldwater Fisheries Management Program now being deployed throughout the state. Therefore we support the fisheries management related comments now being made by AZGFD on the Rim Country EIS.

The Desert Fly Casters have special interest in the fisheries and fishing opportunities in the Rim Country Project area; We routinely visit both the streams and lakes included in that footprint, and indeed have long been part, both as an organization and through individual members' activities, of conservation efforts and stream restoration



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initiatives there. A particular example is Canyon Creek in the Tonto NF, where our on-stream efforts go back many years and continue today. In accord with those interests we would like to emphasize the importance of the following in the analysis and planning for the EIS:

**Stream Restoration**

The numerous streams in the project that both support some of the most productive trout fisheries in the state and contribute to Arizona's vital water supplies. The proposed forest restoration combined with thoughtful hydrologic rehabilitation on those streams can produce resilient, sustainable and highly functioning watersheds that support both native and recreational fisheries. All perennial, ephemeral, or intermittent streams (not just those identified in Figure 6, page 19 of the PA) should be eligible under the EIS to receive restoration and/or improvements, if needed. All drainages can have an impact downstream and cumulative effects can be much greater moving down a watershed. Forest restoration treatments will be watershed wide and landscape scale, and as such, impact every collection of water regardless of size. Not all streams may need restoration or special treatment, but the EIS should provide the necessary compliance, through a flexible "Toolbox" approach, if restoration or special treatment is deemed appropriate. Prior to mechanical or fire restoration treatments, the potential hydrologic impacts of those treatment to streams, aquatic ecosystems, and riparian areas should be formally evaluated. Treatments should be adjusted to avoid or mitigate potential adverse impacts.

**Characterization of Stream Hydrologic Conditions and Aquatic Populations / Conditions**

Monitoring of fisheries and wildlife resources both pre- and post-restoration is necessary for determining if restoration activities are effective, and that treatments are managed adaptively to avoid and/or minimize the potential for negative impacts to wildlife and/or the habitats. Aquatic habitat monitoring is particularly critical to ensure treatments are not resulting in long-term negative impacts to watershed health. The Rim Country Proposed Action should be amended to recognize the needs for pre- and post-treatment monitoring and to describe how it will be used in the project. We especially ask for the identification and characterization of the aquatic invertebrates (the "food-base") in all candidate streams, and also the stream temperature profiles. These measures will best allow for good planning and for the application of adaptive management practices.

Thank you for your attention to these comments,

Gentry Smith, President  
Desert Fly Casters