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August 11, 2016

Coconino National Forest, Attention: 4FRI
1824 S. Thompson Street
Flagstaff, Arizona 86001
Comments sent via email: 4FRI_comments@fs.fed.us

RE: Scoping Comments on 4FRI Rim Country Project Proposed Action

Dear Forest Service:

The Grand Canyon Trust ("GCT" or the "Trust") strongly supports the desire of the Forest Service ("USFS") to reestablish the resilience and function of northern Arizona's ponderosa pine and mixed conifer ecosystems and commends it on taking monumental steps towards achieving this goal. We believe it is vital that forest structure be restored to these ecosystems, thereby allowing for the reintroduction of fire into wildland forests in a way that is safe, acceptable to local communities, and protective of wildlife and native biological diversity. To be successful, GCT believes that restoration efforts must be ecologically, economically, and socially viable.

On June 21, 2016, through correspondence, the Apache-Sitgreaves, Coconino, and Tonto National Forests released a proposal to conduct restoration activities within a 1.24 million acres of ponderosa pine ecosystem over approximately 10 years (the "Rim Country Project" or the "Project"). This correspondence included a brief description of the Purpose and Need and Proposed Action for the Rim Country Project. On June 27, 2016, the U.S. Forest Service ("USFS") published a Notice of Intent ("NOI") to prepare an environmental impact statement for the Project in the Federal Register, at 81 Fed. Reg. 41517, which included a description of the Purpose and Need and Proposed Action. The Proposed Action for the Project would implement treatments – mechanized operations to cut trees and prescribed burns to maintain desired openings and interspaces, between trees – across the Mogollon Rim and Red Rock Ranger Districts of the Coconino National Forest, the Black Mesa and Lakeside Districts of the Apache-Sitgreaves National Forest, and the Payson and Pleasant Valley Districts of the Tonto National Forest.

The Trust respectfully submits these comments on the Proposed Action and the scope of analysis to be conducted in the environmental impact statement. The Trust is a nonprofit organization that focuses on the protection and restoration of the Colorado Plateau – its spectacular landscapes, flowing rivers, clean air, diversity of plants and animals, and areas of beauty and solitude. Since 2009, the Trust has been an active member of the Four Forest Restoration Initiative ("4FRI") Stakeholder Group (the "Stakeholder Group"), a

collaborative group of more than 30 organizations, municipalities, institutions, and agencies focused on carrying out landscape-scale forest restoration efforts across 2.4 million acres of the Mogollon Rim in northern Arizona, including the Project area. GCT staff and members regularly use and enjoy areas of the National Forests within the Project area.

COMMENTS

The Trust believes that the Proposed Action provides a general framework for accomplishing successful forest restoration efforts. However, the Trust encourages USFS to elaborate and refine its plan for forest restoration activities by completing a revised Proposed Action prior to beginning its analysis of the Proposed Action. Specifically, GCT respectfully requests that the USFS develop a revised Proposed Action that includes further discussion regarding: (1) forest structure modification, (2) large and old growth trees, (3) livestock grazing, (4) springs, streams, and riparian areas, and (5) monitoring and adaptive management.

A. Forest Structure Modification

The Proposed Action proposes nine different mechanical treatment approaches. While the descriptions of these various mechanical treatment types provide a useful overview of treatment approaches, the Trust suggests that the USFS revise its Proposed Action by providing a more detailed explanation of how treatments would modify the structural and spatial characteristics of remaining forest cover.

For example, the uneven-aged group selection treatment proposes thinning to 20-80 square feet of basal area with interspaces over 10-90% of the stand in Ponderosa Pine, Ponderosa Pine-Gambel Oak, Ponderosa Pine-Evergreen Oak and thinning to 30-100 square feet of basal area with interspaces adjacent to groups in Dry Mixed Conifer. Here, the ranges for uneven-aged group selection should be somewhat narrowed. The approach presented in the Final Refined Proposed Action for the 1st 4FRI EIS in 2011 provides helpful guidance, aiming for thinning to 50-70 square feet of basal area while interspaces should be more specific and correlate to site quality. The Trust believes that further knowledge about the structural and spatial characteristics of the remaining forest cover would provide the public with a better understanding of the result of mechanical treatments and allow for a more comprehensive analysis of the effects of mechanical treatments on wildlife populations, ecosystem processes, and community uses of the landscape.

The Trust is concerned about the Proposed Action's conception of the role of dwarf mistletoe in the Project area. The occurrence of dwarf mistletoe in ponderosa pine is a natural phenomenon. In a healthy ponderosa pine forest, dwarf mistletoe will occur at a natural level. Indeed, fossil records show that dwarf mistletoes have been around for 40 million years or more, likely providing multiple ecological services.[1] Where dwarf

[1] Hoffman, J.T. 2004. Management Guide for Dwarf Mistletoe. Forest Health Protection and State Forest Organizations, U.S. Forest Service.

mistletoe occurs at unnaturally high levels, it is likely the symptom of other forest health issues. Thus, the Trust suggests that dwarf mistletoe mitigation be removed from the list of potential treatments, that where it occurs at natural levels it be allowed to remain unaddressed by treatments, and that where it occurs at unnaturally high levels that USFS consider addressing other forest health issues rather than mitigating dwarf mistletoe directly through thinning.

Aspen are dying and declining within the Project area and the Proposed Action contemplates the use of barriers to reduce ungulate browsing. GCT supports the use of protective fencing and barriers in these instances to protect aspen clones from ungulate browsing, we also support addressing the root causes of over-browsing in these areas**.**

B. Large & Old Growth Trees

The Trust appreciates that USFS states that there is a need to "retain as many old and large trees as possible and "maintain and promote the development of old growth characteristics and components." However, GCT is concerned that these aspirational statements do not provide sufficient clarity or assurances regarding protection and retention of old growth and large trees.

During the first 4FRI EIS planning process, the Stakeholder Group collaboratively developed an Old Growth Protection and Large Tree Retention Strategy (OGP/LTRS). This document reflects agreement between a diverse group of environmental conservation organizations, scientists, agencies, and industry representatives on how to protect old growth trees and retain large trees during implementation of restoration treatments. The document identifies the actions that should be taken to protect and retain large trees in many situations that would be encountered during the implementation of the Rim Country Project. The Trust believes that OGP/LTRS should be referenced in the Proposed Action and incorporated into the DEIS and FEIS.

The old tree implementation plan (OTIP) and modified large tree implementation plan (MLTIP), presented in the 1st 4FRI FEIS at Appendix D, Sections C and D, also provide clear direction on the protection and retention of old-growth and large trees. While the Rim Country Project area contains a more complex vegetative community than the first 4FRI project area, with a higher incidence of mixed conifer stands, the approaches described in OTIP and MLTIP remain relevant and we urge the USFS to revise the Proposed Action to clearly state that those plans will be be strongly considered for this Project. The Trust suggest that OTIP and MLTIP be referenced in the Proposed Action and incorporated into the DEIS and FEIS.

Additionally, we request that USFS strongly consider forthcoming stakeholder group recommendations regarding criteria for identifying areas with a preponderance of large young trees and management strategies within those areas. This will greatly enhance the social acceptability, ecological appropriateness, and overall success of the Project.

C. Livestock Grazing

The Trust appreciates that one of the resource management topics that USFS plans to address within the Rim Country Project area is the management of livestock grazing. All members of the public have an interest in retaining the ecological benefits of forest restoration while minimizing the potential for unintended losses due to livestock overgrazing. Proactive planning regarding livestock grazing locations, rotations, and utilization levels will help protect the healthy understory of grasses and forbs that return after restoration.

On grazing allotments where thinning and/or burning will occur, GCT suggests that USFS and permittees coordinate together to adjust rotation schedules and ensure that livestock move away from those pastures where thinning and burning operations occur for at least two years post-treatment. Developing such a plan is essential to the success of restoration treatments and the safety of livestock. It will also provide clarity to livestock permittees, enabling them to adjust their operations in a manner that suits their needs during the treatment period.

The Proposed Action discusses management strategies to restore streams, riparian areas, and springs. These resources are essential to the maintenance of biodiversity, provide essential water and forage for wildlife, and fill countless other niches of ecological importance. These areas are also historically important for livestock grazing within the Project area. GCT suggests that USFS consider developing a plan for livestock management that protects streams, riparian areas, and springs in a manner that will increase the resilience of those areas for all uses over the long-term. Such a plan would be particularly useful for those sites that are prioritized for restoration through a systematic approach as suggested in the next comment section.

In the wake of restorative thinning and burning projects, understory conditions will improve. Maintaining resultant increases in biodiversity, grass and forb production, and general resilience of the ecosystem will be high priorities for USFS and the public. The Trust suggests the identification of long-term strategies to retain improved understory conditions resultant from restoration treatments, and those strategies should include consideration of how to best to manage livestock grazing over the long-term within the Project area.

D. Springs, Streams, and Riparian Areas

The Proposed Action recognizes the importance of protecting riparian areas, stream channels, and springs within the Rim Country Project area. Conserving these water sources is even more essential in the age of climate change. Considering that 867 of the 1243 miles of stream in the planning area are non-functioning or functioning-at-risk and approximately 184 springs show downward trends or static-degraded conditions, the Trust suggests developing a systematic approach to the identification of and prioritization of restoration needs in these areas.

Prioritization of these restoration sites would be best developed through a collaborative process where the Stakeholder Group engages in a discussion to balance site condition, importance to aquatic and terrestrial wildlife, recreation value, and other factors. GCT supports the use of protective fencing and barriers to exclude grazing ungulates and removal of trees as appropriate when complimented by addressing root causes of overall degradation.

E. Monitoring and Adaptive Management

A monitoring and adaptive management plan is integral to any restoration project, especially for a project of this scale. Potential impacts to fish, wildlife, and recreation must be measured in order to understand the effectiveness of restoration treatments and communicate useful information about those treatments to the public. While some specifics regarding Mexican spotted owl and northern goshawk habitat requirements are addressed, very little detail is provided regarding other fish and wildlife species. The Trust suggests that USFS provide more detail about the impacts of restoration treatments on the habitats of aquatic and terrestrial species, how those impacts will be monitored, and what adaptive management actions will be taken to reduce potential negative impacts on the habitats of those species.

CONCLUSION

The Trust appreciates the opportunity to comment on the Proposed Action. We believe that the completion of a revised Proposed Action that includes the elaborations and refinements discussed above will help USFS conduct an environmental impact statement for forest restoration activities that garners support among the 4FRI stakeholder group as well as local and regional communities.

Thank you for your consideration.

Sincerely,

Travis Bruner
Arizona Forests Program Manager
Grand Canyon Trust