



July 28, 2016

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

By email: 4FRI_comments@fs.fed.us
CC: afredette@fs.fed.us

Re: Four Forest Restoration Initiative Stakeholder Group scoping comments on the Rim Country Proposed Action.

Dear 4FRI Planning Coordinator;

On behalf of the Four Forest Restoration Initiative (4FRI) Stakeholder Group (“Stakeholder Group”), thank you for the opportunity to submit scoping comments on the Rim Country Proposed Action.

In collaboration with the Forest Service, the Stakeholder Group has been an integral part of the 4FRI planning effort since 2009. Together we successfully developed in 2015 a robust Environmental Impact Statement (EIS) and Record of Decision for the 1st 4FRI analysis area that is now being implemented as part of the largest forest restoration effort in the country. We look forward to duplicating this success with the Rim Country EIS in order to extend restoration treatments along the entire Mogollon Rim, over an area totaling in excess of 2 million acres.

The comments expressed in this letter represent the views of the Stakeholder Group. The Stakeholder Group represents approximately 30 organizations and businesses, spanning a diversity of interests from conservation, industry, local government, academia, recreation and the public. We all stand to be directly impacted by the Rim Country Proposed Action.

This letter has two purposes:

1. To express strong support for the Rim Country Analysis;
2. To provide scoping comments regarding the Rim Country Proposed Action.

I - Support for the Rim Country Project

As amply documented by the conservation, academic and agency scientists, and as generally well supported by an overwhelming majority of stakeholders, the highly departed current conditions of the forested ecosystems in the Rim Country require action to re-establish forest structure, pattern and function, in order to increase forest resiliency and reduce the risk of uncharacteristic fire behavior.

The Stakeholder Group therefore strongly supports the objective of the Rim Country Analysis “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” (Rim Country Proposed Action).

The Stakeholder Group further strongly supports the desired outcome of “improving structure and function (and) increas(ing) ecosystem resiliency (and) the ability of [the Rim Country] ecosystem to survive natural disturbances such as fire, insects and disease, and climate change without changing its inherent function” (Rim Country Proposed Action).

Therefore, the Stakeholder Group strongly supports the Purposes and Needs stated for the Rim Country Project 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”

(Rim Country Proposed Action).

II - Comments on the Rim Country Proposed Action

1) Good Starting Point Document

The Stakeholder Group appreciates the overall quality and comprehensiveness of the Proposed Action, and passes on a resounding “Well Done!” to the people and the team responsible for it.

2) Need to Include All Stakeholders Input

The Stakeholder Group appreciates that much of the early stakeholder input has been integrated in the Proposed Action, as illustrated in the cross-walk document *How Feedback on Rim Country draft PA was Addressed*. However, the stakeholders noted a number of areas in which the Proposed Action could more fully incorporate comments provided on the Draft Proposed Action. These include issues and opportunities related to habitat restoration and management for terrestrial and aquatic wildlife.

We request that all input from all stakeholders be considered and analyzed in the EIS, and that the Forest Service extend all possible opportunities to stakeholders to not only provide, but further discuss their input with the interdisciplinary team. In the spirit of collaboration, and to

ensure transparency, when stakeholder input is not included, a disclosure and explanation of the decision should be shared with the Stakeholder Group.

3) Need for Details

The Stakeholder Group understands and appreciates that a Proposed Action, by its very nature, cannot be – and should not be - as detailed as an Action Alternative, or as an Impact Analysis.

However, we are concerned that the extremely general short paragraphs that describe possible restoration actions, such as the paragraphs on Proposed Treatments (p. 21), Grassland and Meadow Restoration (p. 25), Spring Restoration (p. 26), Riparian Stream and Stream Channel Restoration (p. 26), Stream Habitat Restoration (p. 26), Aspen Restoration (p. 26), do not convey anything more substantial than generalities, and do not provide the public with a meaningful understanding of the number, intensity, distribution, timing or potential effects of the actions that are being proposed.

From a different perspective, we observe that some new terms such as “No Fire” (e.g. Tables 3 & 4, p. 7) have appeared but are not specifically defined, and that the language addressing the long standing issue of old growth and future old growth shifts from the notion of “old trees” to “large trees” to “old and large trees.” Additional consistency and definition of terms used, is needed.

We fully expect that the Rim Country EIS Action Alternatives and associated Effects Analyses will provide all needed details for each Action Alternative and Effects Analysis, and that these details will be made available to the Stakeholder Group in a timely manner, so that Stakeholders can conduct additional analysis and provide input to the Forest Service.

We further request that the proposed management actions in old growth and future old growth (large young trees) stands be very explicit, and include the clear statement that no old growth trees (predating Euro-American settlement or currently exhibiting old growth structural characteristics) shall be cut. Regarding the Stands with Preponderance of Large Young Trees (SPLYT), we request that the unfinished work currently underway in the Planning Workgroup between the stakeholders and the Forest Service continue in order to jointly and collaboratively identify the most accurate descriptors and characterizers for the SPLYT, and the most appropriate treatments for these stands. This issue is very important to the Stakeholder Group.

4) Need to Increase and Broaden the Wildlife Focus

The Proposed Action would benefit from inclusion of a broader scope of wildlife habitat restoration needs and actions. Notably, the Proposed Action should address increasing wildlife diversity through increased spatial heterogeneity of habitat components for aquatic and terrestrial wildlife within the footprint, not just those that are federally protected.

The Stakeholder Group understands that the Cooperating Agency relationship between the Forest Service and the Arizona Game & Fish Department will be a conduit for addressing some of these concerns. However, input from other stakeholders should be fully incorporated at the scoping stage as well, as there is no certainty that the Forest Service will include such input later in the NEPA process. The Stakeholders request that their issues be included in the Proposed Action to ensure that they are analyzed in the NEPA process.

We therefore request that the wildlife focus be significantly increased and broadened, and that all interested stakeholders be given full opportunity to contribute to the development of restoration actions that relate to fish and wildlife.

5) Need to Increase and Broaden the Attention to Socio-Economic Issues

The Stakeholder Group appreciates the fact that the Forest Service modified its first draft of the Proposed Action to include a Statement of Socio-Economic Purposes & Needs, and an accompanying short narrative in response to the input of the Stakeholder Group.

However, we are concerned that this narrative may indicate a worrisome bias when stating: “Engaging industry would offer the opportunity to cover all, or nearly all, of the cost of removal of forest restoration byproducts by the value of the products removed” (Rim Country Proposed Action). While in many cases this statement may be perfectly appropriate, there also exist many cases in which this statement may be leading to unrealistic expectations. Treatment types, biomass removal specifications, current conditions, desired conditions, and maybe above all, treatment locations and hauling distances, are all critical factors that contribute in making the value of the material removed sufficient, or not, and sometimes by far, to fully offset the costs of treatments.

The Stakeholder Group therefore requests that socio-economic current existing conditions and socio-economic desired conditions be added during the NEPA process to support the socio-economic statement of purposes and needs, and that detailed analyses of the economic viability of the treatments be conducted during the EIS process, treatment area by treatment area, to guide the Implementation Plan, and, ultimately, inform the selection of the contracting and packaging mechanisms of the treatments.

6) Need for In-Depth Descriptions and Analyses of Proposed Treatments and Restoration Actions

As previously noted in Section 3 *Need for Details*, the paragraph on Proposed Treatments (p. 21) is extremely general. Further, the *Mechanical Treatments* table (pp. 22 to 25) outlines a series of ranges of treatment descriptions and objectives (e.g.: Uneven-aged Group Selection in Ponderosa Pine: “thin stands to 20-80 square feet of basal area and establish interspaces over 10-90% of the stand;” Uneven-aged Group Selection in Dry Mixed Conifers: “thin tree groups to 30-100 square feet of basal area;” Intermediate Thin in Ponderosa Pine: “thin tree groups to 70-90 square feet of basal area;” Intermediate Thin in Dry Mixed Conifers: “thin tree groups to 40-100 square feet of basal area;” etc.) but there is no indication of any distribution of treatment intensities across the sites, creating the possibility, that ALL treatments could be implemented at the highest, or lowest, intensity of the ranges, while technically remaining within the specified ranges.

Further, the treatment descriptions and objectives do not reference the Best Available Science Information (BASI) sources necessary to assess whether the treatments are likely to meet the objectives of the Proposed Action in the relevant stands, or how the direct or indirect effects of the treatments will impact the neighboring stands.

Finally, all the proposed mechanical treatments include the statement “and/or Prescribed Fire” (Table 9). We are concerned that many treatments need to include both mechanical thinning

“and” prescribed fire. In many cases fire cannot be reintroduced before thinning first, and in most cases thinning should be followed by prescribed fire.

The Stakeholder Group therefore requests that the EIS include an in depth description and analysis of the proposed treatment and restoration actions, including the Best Available Science Information (BASI) supporting the design and selection of the treatments, the sequencing of mechanical and prescribed fire treatments, and the detailed analysis of the direct and indirect ecological impacts of the treatments in the Rim Country Analysis.

The Stakeholder Group further requests the thorough development of a range of Action Alternatives that addresses the effects of treatment types, treatment intensities, and the cumulative effects of implementation actions across the landscape.

In addition, the Stakeholder Group requests that the development of Rim Country Action Alternatives, and their analyses, include additional restoration actions, such as but not limited to restoration of riparian and aquatic habitats, in all those areas and projects (e.g. Cragin Watershed Protection Project (CWPP)), that are located within the Rim Country EIS footprint, and that have been, or are going to be mechanically thinned for wildfire protection or fuels management purposes under separate NEPA analyses.

7) Need to Integrate Monitoring and Adaptive Management Flexible Tools

The Stakeholder Group is concerned that Monitoring and Adaptive Management are not explicitly addressed in the Proposed Action.

This is an important issue for the Stakeholder Group. Our previous scoping comments for the first 4FRI Proposed Action are still relevant for this Proposed Action: “In addition to the need for a targeted and efficient monitoring program, we also would like to emphasize the tremendous opportunity provided by the 4FRI to increase our understanding of the ecology of these systems. Given the 4FRI’s commitment to being a science-based endeavor we would ask that the Forest Service help cultivate an atmosphere that is conducive to research being conducted by a variety of partners. Adaptive management requires explicit statement of goals and objectives, and a well-informed monitoring program that has the requisite power to detect management impacts rapidly enough to inform future management. Furthermore, adaptive management is a structured decision-making process that relies on clearly articulated triggers for management change. Finally, adaptive management requires a commitment to change management when monitoring data indicates that the thresholds identified by those triggers have been crossed” (SHG Comments 1st 4FRI EIS).

The Stakeholder Group requests that the Forest Service engage collaboratively with the 4FRI Stakeholder Group to develop a comprehensive Monitoring and Adaptive Management Plan to be included in the Rim Country EIS and Record of Decision.

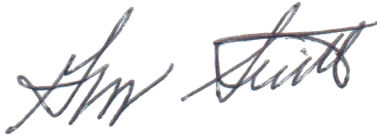
The Stakeholder Group appreciates the efforts deployed by the Coconino, Tonto and Apache-Sitgreaves national forests and the USFS 4FRI staff and leadership to perform the thoroughly robust Environmental Impact Statement that the Rim Country Project deserves, and we urge the Forest Service Team to complete this task in the timeliest manner.

We expect to be actively involved in the development of the Environmental Impact Statement for the Rim Country Project; we hereby reserve the right to provide further comments as the process unfolds; and, in the spirit of collaboration, we respectfully request that the Forest Service commit to receiving and considering further comments and emerging ideas provided under the auspices of continuous scoping as the Action Alternatives are developed and the Effects Analyses are conducted.

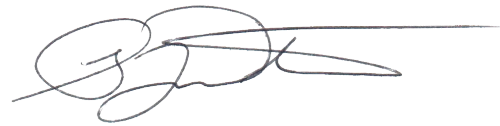
The Stakeholder Group is committed to working with the Forest Service to design, implement and monitor an ecologically, economically, legally and socially robust Environmental Impact Statement.

Thank you for your consideration.

Respectfully submitted on behalf and with the approval of the 4FRI Stakeholder Group,



Greg Smith
4FRI Stakeholder Group seating 1st Co-Chair



Paul Watson
4FRI Stakeholder Group seating 2nd Co-Chair