

**From:** [Joe Miller](#)  
**To:** [FS-4FRI Comment Database](#)  
**Cc:** [Kruger, Jeremy - FS](#); [Steve Reiter](#); [Neil Warner](#); [Alan Davis - ZGTU](#); [Steve LaFalce](#); [Mickey Fletcher](#); [Nate Rees](#); [JAMiller101@gmail.com](mailto:JAMiller101@gmail.com)  
**Subject:** Arizona Trout Unlimited Council Comments on the 4FRI Rim Country Project DEIS 1-16-2020  
**Date:** Thursday, January 16, 2020 4:06:02 PM  
**Attachments:** [AZTU FINAL RCP DEIS COMMENTS Letter w Signatures Jan 16 2020 VERISION 7-0.pdf](#)

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January 16, 2020

Dear 4FRI interdisciplinary Team:

Please find attached in PDF format the Arizona Council of Trout Unlimited Comments Letter on the 4FRI Rim Country Project DEIS.

We appreciate the opportunity to submit these comments and look forward to further collaboration on the RCP.

Joe Miller, for the Arizona Council Trout Unlimited (AZTU)



*Expanding and Improving  
Arizona's Native and Wild  
Trout Fisheries*

[www.az-tu.org](http://www.az-tu.org)

Date: January 16, 2020

To: Four Forest Restoration Initiative Interdisciplinary Team  
c/o Coconino National Forest Supervisor's Office  
1824 S Thompson Street  
Flagstaff, Arizona, 86001

Subject: Comments on the Four Forest Restoration Initiative Rim Country Project Draft Environment Impact Statement

Submitted via Email to: [4fri\\_comments@fs.fed.us](mailto:4fri_comments@fs.fed.us)

Dear US Forest Service Rim Country Project Interdisciplinary Team:

The Arizona Council of Trout Unlimited (AZTU), an Arizona Corporation, and its member chapters, have worked on conserving these forests and waters of the US Forest Service Rim Country Project (RCP) EIS area, and the native and wild trout in them, for many years. We are a formal member of the Four Forest Restoration Initiative (4FRI) Stake Holders Group (SHG), interfacing with the USFS 4FRI Interdisciplinary Team under a long standing MOU, working collaboratively along with other organizations like the Arizona Game and Fish Department, The Nature Conservancy, Grand Canyon Trust, the Arizona Wildlife Federation and several other state and regional organizations and timber industry group members. We appreciate the opportunity to comment on the DEIS, and to have worked collaboratively with the Forest Service on its development. We also look forward to our future continued involvement and collaboration with the Forest Service and the other 4FRI Stakeholders on this critical effort.

Overview and background of AZTU and Trout Unlimited National Organization: Trout Unlimited is the nation's largest coldwater conservation organization, with some 300,000 members and affiliates across the country, and several thousand members and affiliates in Arizona. Our mission is to protect, conserve, and restore coldwater fisheries and their watersheds for the next generations. Above all, TU is dedicated to protecting and enhancing watersheds. We see the 4FRI RCP as critical to that mission and dedication, and to the long term critical water-

sources, watersheds, and fisheries of the RCP footprint and well beyond it. We appreciate the collaborative opportunity to continue our engagement on the RCP.

We recognize Forest restoration planning can be complex and tedious work, but that these plans are vitally important to the things TU members care about – native trout, wild non-natives, the health of watersheds critical to those creatures and also to Arizona's human population, its free-flowing rivers and streams, and to the outstanding opportunities for outdoor recreation the 4FRI Area offers, in addition to the prevention of catastrophic level wildfires across this landscape.

### **The Rim Country Project Purpose and Needs:**

The RCP "seeks to reestablish and restore forest structure, pattern, and composition to increase forest resiliency and reduce the risks of uncharacteristically severe fire."

#### RCP Stated Needs:

- ● Increase forest resilience and sustainability
- ● Reduce hazard of undesirable fire effects
- ● Improve terrestrial and aquatic species habitat
- ● Improve the condition and function of streams, springs and other aquatic and hydrological resources
- ● Restore riparian vegetation
- ● Preserve cultural resources
- ● Support sustainable forest products industries
- ● Improve the motorized transportation system and provide for a more sustainable road system where poorly located roads are relocated or obliterated.

We take these statements of purpose and needs as providing the fundamental direction for the EIS. We restate them here because of our view that the EIS must fully address them and the effects of treatments distributed over a vast landscape and an extended 20 year duration of treatments, at the risk of an inadequate analysis.

From our perspective this purpose and these needs all have direct or very significant relationship to the watersheds, streams, and springs of the RCP, the inhabitants of those components of the broad aquatic Rim Country Project footprint, and the many useful watershed functions provided by the "forest structure, pattern, and composition" that affect those aquatic ecosystems.

AZTU has very actively participated in and facilitated the Scoping Process for the RCP in 2016, submitted extensive and comprehensive comments for that scoping, and has continued its deep involvement with the USFS and colleague organizations as the DEIS content was developed over more than a 3 year period. Our purpose was to provide input on improving terrestrial and aquatic species habitat and improve the condition and function of forest ecosystems, especially streams, springs and watersheds.

The USFS has clearly recognized and addressed much of the intent and concerns AZTU expressed in those submitted comments through the development of the "Aquatics and Watersheds Flexible Toolbox Approach" (AQWFTA) as well as the Mechanical Flexible Toolbox Approach. The DEIS identifies a "No Action" Alternative, and we recognize it has included the **AQWFTA** in its entirety in both the Action Alternatives proposed and

analyzed as a Condition Based Management Approach. We welcome the AQWFTA and are happy to have participated in its development. We also appreciate that it was collaboratively reviewed by AZGFD. We support the preferred alternative for that alternative's more comprehensive forest restoration approach. **However we are still concerned that the water resources, watersheds, and considerations for aquatics are not being addressed with the same importance and attention as called out for the timber resources and their management in the DEIS.**

The USFS is now taking comments on the DEIS and has indicated it will develop a final FEIS by winter 2020 and with the preparation of a Final Record of Decision expected in spring / summer 2021. Actual forest restoration work will occur over the 20 year period following that ROD. We understand that the general approaches and the specifics proposed in the DEIS contents may be subject to significant revision during the development of the FEIS and ROD, and we are asking the USFS to give full consideration both to our original scoping comments and to our key concerns as expressed below.

We also ask the USFS to work collaboratively with us and other members of the 4FRI SHG as called for in the Collaborative Forest Landscape Restoration Program (CFLRP) guidelines which governed the 4FRI Projects, and as discussed in the 4FRI SHG comments submitted separately. Those collaborations should be clearly provided for in the EIS as they should be an integral part of the detailed Implementation Planning and treatment execution, and the comprehensive monitoring actions for Adaptive Management in the RCP over its expected 20 year lifetime.

An Updated Summary of those key AZTU Rim Country Project Scoping Comments as Submitted in August 2016:

- All waterways – perennial, ephemeral, or intermittent – as well as upland dry drainages, should be eligible under the EIS to receive restoration and or improvements
- Evaluation of the hydrologic impacts of forest treatments to streams, aquatic ecosystems, and riparian areas should be done (Prioritizing and formalizing treatment plans) prior to finalizing mechanical or fire restoration prescriptions in their watersheds.
- All drainages have an impact downstream and cumulative effects are greater moving down a watershed. The EIS and future action planning should recognize this increasing effectiveness and cumulative impact of restoration work (and also the cumulative downstream risk and impact of not including protective actions on the upper reaches of any stream) moving downstream in a watershed.
- The value of Monitoring, including stream temperatures and use of macroinvertebrate assemblage assessments, to assess watershed condition before, during, and after forest restoration planning and implementation actions to support adaptive management.
- Watershed restoration work does not fit neatly into stream reach categories of ephemeral, intermittent, or perennial in the diverse and dynamic ecologies of the Southwest. The recommendations and management actions of the restoration techniques and desired conditions should reflect that diversity and need for flexibility.

- The importance of Wet Meadow hydrologic features impact to overall watershed and aquatic ecosystem health and recognition of the need to address restoration of these forest features.
- The importance of these watersheds as water-sources for thousands of people in a few mountain communities like Payson but also as perhaps the major water-source for millions of people in the Phoenix metropolitan area. As Arizona Corporation Commissioner Lea Marquez Peterson commented recently regarding the Biomass concern, quoting Regional Forester Cal Joyner about that concern as “key to the provision of secure infrastructure and clean water for our desert cities”. In addition to the economic values these watersheds offer for the water itself they offer great recreational values. *(These recreation values have recently been reinforced by Audubon Arizona’s 2018-2019 Surveys showing enormous economic value of water oriented recreation, with angling as a major contributor, at the local, County and total state level. Much of those benefits are in the 4FRI and RCP footprint.* **REFERENCE LINK:** [www.audubon.org/AZRivers](http://www.audubon.org/AZRivers) )
- Proposing and advocating for a holistic and fully integrated approach to the RCP project planning, decision making and implementation with recognition of the need for a balanced management of all forest resources.

**AZTU Key Concerns regarding the DEIS and recommendations for the Final EIS and the future Record of Decision development:**

- The DEIS does not provide for balanced review, decision making, prioritization and integration of the Aquatics and Watershed Flexible Toolbox Approach and the Mechanical Toolbox Approach for implementation planning and actions. Given the stated purpose and needs for the EIS, the impact of Mechanical treatments on aquatics resources at all levels and for all geographic areas should be an integral part of all implementation planning. An additional aspect of this concern is that a large scale and accelerated pace of mechanical operations may pose further risk to watershed health if not properly planned.
- There is a lack of projected long term sequencing of work planning by treatment area with adaptive management guidelines. Given that the RCP EIS will be in force for a 20 year period, it is only to be expected that there will likely be substantial changes in conditions on the ground and in the watersheds before actions on specific areas are planned and implemented. Some of these changes will be due simply to the passage of time, some due to climate change, others due to natural occurring or man caused wildfires, and others due to the impact of treatments already conducted on adjacent areas or in upstream reaches of a watershed. They will in effect establish a new set of “Current Conditions” at the time of specific implementation planning. The EIS should clearly address these issues early and provide a clear understanding of how they will be addressed during the overall implementation period.
- There is a lack of definition for monitoring plans (data definition; as well as data collection, retention and integrity protocols) to support initial implementation action planning and longer term adaptive management review and decision making. This concern applies both to the original Current Conditions and also the likely changed Current Conditions as discussed in the previous point.

- The Arizona Game and Fish Department compilation table for potential priority aquatic restoration projects and stream reaches provided during the DEIS development period should be included in the EIS, as requested in the 4FRI SHG comments. All projects on that compilation table should clearly not be subject to additional NEPA to address those projects.
- Even with our agreement on the inclusion of the AZGFD Compilation table in the EIS as stated above, We continue to request, as in our scoping comments, that the restoration and improvement of all drainages, stream reaches and watersheds within the 4FRI RCP be covered for NEPA clearance regardless of classification or form of implementation, subject to consistency with the AQWFTA.
- There is a lack of definition of funding mechanisms other than those implied for mechanical treatments. If desperately needed aquatic treatments are delayed in time due to lack of industry based funding what alternative means are envisioned, and how are they provided for in the alternative analyses?

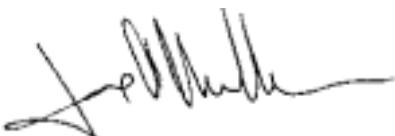
In Conclusion:

As in our 2016 Scoping Comments for the 4FRI Rim Country EIS, we sincerely believe that the forest restoration of the Rim Country is critically necessary and we trust in the collaborative process to guide the vegetation treatments on that footprint, and we will continue our participation in that effort. However, our goal is still to see more importance put on the hydrology and aquatic ecosystems in the footprint, as you cannot have a healthy forest or watershed without the cumulative health of the uplands and waterways, including the aquatic inhabitants. Given that the overarching purpose of these National Forests is protection of the Watersheds, we think that goal is appropriate.

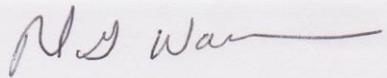
Sincerely,



Steve Reiter, Chair, Arizona Council of Trout Unlimited (AZTU)



Joe Miller, President, Gila Trout Chapter and AZTU Representative to Four Forest Restoration Initiative



Neil Warner, AZTU Representative, Trout Unlimited National Leadership Council



Alan Davis, President, Zane Grey Trout Unlimited Chapter



Mickey Fletcher, President, Old Pueblo Trout Unlimited Chapter



Steve LaFalce, President, Grand Canyon Chapter Trout Unlimited



Nate Rees, Sportsmen's Conservation Project Coordinator, Arizona, Trout Unlimited

Copies to:

Arizona Game and Fish Department; Aquatics and Habitat Branch Chiefs

Four Forest Restoration Initiative Stakeholders Group Co-Chairs

Eastern Arizona Counties Association, Chair and Executive Director

Audubon Arizona Policy Manager

Arizona Sportsmen for Wildlife Conservation Executive Director