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First name: Rob

Last name: Marshall

Organization: The Nature Conservancy in Arizona Center for Science & Public Policy

Title: Director

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Annette Fredette, 4FRI Planning Coordinator

U.S. Forest Service

Coconino National Forest

1824 S. Thompson St.

Flagstaff, AZ 86001

4FRI_comments@fs.fed.us

afredette@fs.fed.us

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

4FRI Planning Coordinator,

Thank you for the opportunity to comment on the Rim Country Project's Proposed Action of the Four Forest Restoration Initiative (4FRI). The Nature Conservancy ("Conservancy") has actively supported forest restoration in Arizona for over 20 years, and is proud to be a strong partner with the U.S. Forest Service as they continue to address forest management needs at a scale that matches the scope of this critical issue.

As a participating member of the 4FRI Stakeholder Group, we support the comments provided by this group as approved at the July 27, 2016 4FRI Stakeholder Group meeting. We focus our organization-specific comments here towards providing meaningful input that will help craft the Draft Environmental Impact Statement ("Draft EIS"). We have divided our comments into three categories: 1) support for the Proposed Action ("PA") document itself; 2) input designed to improve documentation and development of the Draft EIS; and 3) preparation for project implementation.

Support for the Proposed Action

The Conservancy is in strong agreement with the overarching Purpose and Need embedded with the Proposed Action. We agree with the expressed desired conditions of a restored forest structure and pattern, improved forest health, and vegetation composition and diversity that reflect conditions within their natural ranges of variation. We do note that while your statement specifies ponderosa pine (PA p. 3), we understand that multiple vegetation types are being evaluated for restoration purposes (i.e. dry mixed conifer, grasslands, aspen, etc.). In addition, we are pleased to see focus on maintaining structural diversity such as snags and coarse woody debris for wildlife habitat complexity, as well as maintaining or improving aquatic habitats to meet needs for the variety of aquatic and riparian-dependent species. We also appreciate the increased attention on the economic conditions necessary to build a successful forest restoration effort in a timeframe that matters.

Input for Draft EIS

In taking this PA forward to the next step, that of developing and analyzing alternatives for the Draft EIS, we encourage the U.S. Forest Service to address consistency in use of terms, both within the PA and between this analysis process and the First EIS under 4FRI, and clarify concepts and treatment outcomes. As examples:

- a) Dry mixed conifer vs. mixed conifer vs. frequent-fire mixed conifer are often used to describe the same vegetation type.
- b) Old and large vs. larger/older vs. large and/or old trees are all used as descriptors and could cause confusion.
- c) The terms "high severity fire" and "active crown fire" seem to be used at different places to refer to essentially a similar condition-consistency (and definition) of terms such as these may be helpful in future documents.

- d) The concept of Natural Range of Variability ("NRV") is mentioned in the Purpose section (PA, p. 3), but not referred to in the Desired Conditions. It may be helpful to both describe what NRV is for readers of the Draft EIS and also describe where and how we may not achieve NRV given socio-political and economic aspects of the restoration effort.
- e) Tables 3 and 4, if translated into the Draft EIS, should have a clearer definition of "No Fire," as well as have a column for "Surface Fire," as the only options described are "No Fire" and two categories of "crown fire," with the percentages not totaling 100%.
- f) "Brush" seems to be a non-technical term and is also not defined.
- g) Perhaps use different terms than "understocked" and "stocking levels" as they refer more to timber production than ecological conditions, particularly if the Draft EIS will use the Natural Range of Variability concept. As an example, paragraph 3 on page 8 of the PA could state "There are approximately 69,360 acres of national forest lands in the project area in need of reforestation, a term applying ecological needs for forest cover rather than wood production.
- h) Aspen restoration (PA, p. 26) includes, but does not provide adequate rationale for, removing aspen. This may cause confusion without explanation; does this mean "remove dead aspen" or is there another reason for aspen removal in areas targeted for aspen regeneration?
- i) Despite being in similar vegetation types, it may improve understanding of management differences for Mexican Spotted Owl (MSO) and Northern Goshawk (NOGO) treatments by separating their descriptive treatments.
- j) Reflecting upon the 4FRI First EIS, the objection process, and the resultant agreed-upon negotiation relative to MSO treatments, we suggest providing explicit support, rationale, and justification for MSO treatments that may have only been embedded within the Biological Opinion and not easily attainable by stakeholders during the EIS review process. Documenting the support and agreement between the U.S. Forest Service and the U.S. Fish [Wildlife Service for proposed treatments needs to be a part of the Rim Country Project EIS.
- k) Planned protective barriers and fencing may need to be prioritized from both an economic feasibility and capacity standpoint.

Preparation for Project Implementation

We appreciate the increased emphasis in the Rim Country Project EIS on incorporating industry and socio-economic perspectives and needs. We applaud the U.S. Forest Service's responsiveness in modifying planned contract implementation processes and schedules to better fit the current economic realities the small-diameter wood industries face. To continue that momentum into this next large analysis, we suggest that the Draft EIS analysis of mechanical treatment effects takes into account a variety of potential harvesting and biomass removal scenarios and results on the environment. With the current economic analyses provided by Campbell Global of the C.C. Cragin treatment area, several innovative recommendations have emerged that could facilitate industry while modifying somewhat how harvested wood and residual biomass is removed. These ideas may have environmental effects (for example, allowing logs to dry out on site] leaving a certain percentage of biomass on site in various ways) that, without proper analysis, may not be allowed or supported during implementation of these proposed treatments.

While understanding that any EIS is not a prescriptive guide to implementation, we would like to ensure that such flexibility is allowed under this analysis to the extent possible. Certain geographic areas distant from current-and even potential-economic working circles may have to incorporate such flexibility in order to achieve at least some threshold of restoration and catastrophic fire risk reduction. Disclosing effects of the suggestions made by Campbell Global, or by other stakeholders, may help maintain a flexible implementation process.

This underscores the most fundamental need of forest restoration today. We are faced with an increasing urgency to address forest health or face the potential loss of a significant portion of our northern Arizona forests to uncharacteristically high-intensity wildfire. To achieve success in reducing that risk on a landscape scale, all parties-stakeholders, industry, and agency land managers-must be nimble, innovative, and flexible in trying out new ideas for both ecological treatments and economic scenarios.

The Rim Country Project offers a chance to make a meaningful difference in a landscape that provides healthy watersheds and clean water for both humans and wildlife; economic engines for rural communities; and a quality of life for all Arizona residents and visitors alike.

Thank you for the opportunity to comment on the Rim Country Proposed Action, and we look forward to the success of the Rim Country Project analysis and the continued restoration of our northern Arizona forests.

Regards,

Rob Marshall
Director, Center for Science and Public Policy