Data Submitted (UTC 11): 1/16/2020 7:00:00 AM
First name: Frank
Last name: Schettino
Organization: Desert Fly Casters
Title: President
Comments: NOTE: An electronic version of the commenter's original letter, received via email, is attached.

Dear 4FRI Interdisciplinary Team;

Please find attached in PDF form comments on the 4FRI Rim Country Project DEIS. Thank you for the opportunity to comment on the RCP DEIS.

Joe Miller

Desert Fly Casters Conservation Chair,

for Frank Schettino, President, Desert Fly Casters

January 16, 2020

Attn: USFS Four Forest Restoration Initiative (4FRI) Rim Country Project (RCP) Interdisciplinary Team c/o Coconino National Forest Supervisor's Office

1824 S. Thompson St.

Flagstaff AZ 86001

Submitted By Email To: 4fri_comments@fs.fed.us

CC: Frank Schettino sketno1026@hotmail.com

Re: Desert Fly Casters Comments on the 4FRI Rim Country Project DEIS. Dear 4FRI ID Team;

The Desert Fly Casters club is a long time non-profit representing hundreds of fly fishers in the Phoenix metropolitan area and from 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 welcomed the opportunity in 2016 to comment on the Scoping of the 4FRI Rim Country Project EIS Proposed Action, and have regularly monitored the progress of developing the RCP DEIS since that time. 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 Affiliate of Fly Fishers International.

We have reviewed the DEIS on the Rim Country Project (RCP) and continue to support the objective of the Rim Country Projects Proposed Action "to reestablish and restore forest structure, [hellip] forest health, [hellip] and diversity [hellip], thus moving the project area toward the desired conditions." We further continue to 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 the comments on the DEIS being submitted by the Arizona Trout Unlimited organization (AZTU), and we routinely receive briefing reports from the Arizona Game and Fish Department (AZGFD) such as on their Coldwater Fisheries Management Program now being deployed throughout the state. We have recently committed funds to AZGFD on a stream restoration project they are now conducting that is actually within the RCP area. Therefore we also 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 many of 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 initiatives there.

A particular example is Canyon Creek in the Tonto NF, where our on-stream efforts go back many years and continue today. Canyon Creek provides an excellent example of the needs and difficulties of managing the complex interactions between the surrounding forest areas and the waterway itself. That stream has been the focus of several cycles of restoration efforts, as it has endured cycles of degradation, treatments, catastrophic fire impact from the surrounding broad area, more very successful restorations, and then very recently impact from the hydrologic effects of heavy monsoonal rainfall and the subsequent extreme runoff.

We note that those most recent restorations greatly helped in preventing even more impact from the heavy post monsoon rain flows. Canyon Creek was the focal point of a 4RFI Stakeholders Group (SHG) Field Trip for the purpose of helping develop the RCP's Aquatics and Watershed Flexible Toolbox Approach (AQWFTA) that is now a significant part of the RCP DEIS. Members of our organization were a part of organizing and conducting that field trip for the 4FRI SHG and the USFS IDT together with AZGFD, AZTU, and a number of other conservation organizations and state and regional bodies. We are glad to see that the AQWFTA is included in its entirety as a part of both of the potential Action Alternatives, especially the Preferred Alternative , as called out in the DEIS.

We do have concerns regarding the contents of the DEIS, and since we understand that during the next year it may well undergo significant additional definition of elements of the alternative actions and finalization of the analyses of those actions, we will submit these comments at a summary level.

In accord with those concerns and our particular interests we would like to emphasize the importance to us of the following in the further analysis and planning for the FEIS and Draft Record of Decision:

Stream and Watershed Restoration and Integration with the Uplands Restoration Elements

The numerous streams in the project area and the watersheds of which they are a part all support some of the most productive trout fisheries in the state and also contribute enormously to Arizona's vital water supplies. The proposed forest restoration combined with thoughtful and well integrated hydrologic rehabilitation on those streams and watersheds can produce resilient, sustainable and highly functioning watersheds that support both

native and recreational fisheries.

All perennial, ephemeral, or intermittent streams and stream segments in the RCP footprint, and including Wet Meadows and adjacent "Dry Uplands" without regard to arbitrary classification or description, should be eligible under the EIS to receive restoration and/or improvements, if needed and properly analyzed, without additional time consuming and expensive NEPA efforts. All drainages can have an impact downstream and the cumulative effects and risks of deferred or improperly done treatments on the waterways, riparian areas, and including the surrounding uplands 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 resources regardless of size.

Not all streams or all stream reaches may need restoration or special treatment, but the EIS should provide the necessary compliance, through that flexible "Toolbox" approach, if restoration or special treatment on any aquatics resource in the RCP footprint is deemed appropriate over the next 20 year duration of the FEIS and ROD, in addition to the specific water resource elements already identified as priority projects by the AZGFD and provided to the RCP IDT.

It is important to us that prior to mechanical or fire restoration treatments on adjacent or surrounding areas, the potential hydrologic impacts of those treatments to streams, aquatic ecosystems, and riparian areas should be formally evaluated. Surrounding Treatments should be adjusted to avoid or mitigate potential adverse impacts.

We understand that the 4FRI SHG Comments on the DEIS specifically request better and more structured integration between the review of, planning for, scheduling for, and actual implementation actions of the Mechanical Toolbox Approach regarding Vegetation Treatments and the AQWFTA. Likewise we understand those comments request continued collaboration and involvement of the various members and participants of the 4FRI SHG with the USFS during detailed planning and implementation under the FEIS and ROD. We support those requests of the 4FRI SHG.

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. We previously suggested during the Scoping Comments period that 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 asked for the identification and characterization of the aquatic invertebrates (the "food-base") in all candidate streams, and also the stream temperature profiles. We continue to believe that those or similar measures would be of great value for good planning and for the application of adaptive management practices on the RCP, but do not see sufficient provision for them in the DEIS.

Thank you for your attention to these comments,

Frank Schettino, President Desert Fly Casters