***BAR T BAR RANCH, INC.***

***P. O. Box 190***

***Winslow, AZ 86047***

***928-289-2619 ~ info@bartbar.com***

8/7/16

Coconino National Forest

Attention: 4FRI

1824 S. Thompson Street

Flagstaff, AZ 86001

To Whom It May Concern:

In response to your request for comments to the 4FRI Rim Country Project Proposed Action, we would like to make the following comments:

1. Generally we are strongly supportive of the Purpose & Need for the project.
2. We are in support of any means to expedite and/or make the process more efficient. Time is of the essence.
3. Page 4 & Page 24, where "Facilitative Operations" is defined: if fire is utilized in the pinon-juniper, we would suggest that there is aggressive removal of the "PJ". Grassland fires do not have the same positive effect as direct elimination of trees.
4. Page 8, 4th paragraph, reference to pronghorn as "Management Indicator Species "(MIS). It is our understanding that under the new Forest Plan, that term is obsolete, and no longer management protocol. It has a tendency to attract legal issues and in our opinion, should not be used.
5. Page 12 & 26: Spring Restoration treatment, namely fencing, or "protective barriers". There should be advance research to determine if the water rights are owned by a Grazing Permittee. In the event they are owned by a Permittee, then there would have to be mutual agreement to fence off the spring from grazing ungulates. Mitigation measures might include piping water to an alternative location.
6. Page 13, Habitat for rare plant species: increase individual recruitment of aspen, etc. there is mention of "protective barriers placed around sites to prevent browsing and other disturbance during regeneration". We suggest that fencing should be at a minimum because it requires maintenance and historically that is a difficult order for the USFS to perform. It ends up not getting done, creates a bigger problem for large ungulates, and is an unsightly, and potentially dangerous mess in the forest.
7. Page 14 Stream Habitat Restoration: "Restore 360 miles of stream habitat..." Given that extraordinary amount , it needs to be low maintenance, or it will not get maintained.
8. Page 26 Riparian Stream & Stream Channel Restoration: "Protecting sites from grazing ungulates,...and/or removing stock tanks". This could be, once again, a water rights issue, which needs to be investigated first. Second, even if the water rights are not owned by the Grazing Permittee, removing stock tanks should not be allowed, unless the Permittee is in full agreement. IF, the Permittee is in agreement, a provision for an alternative water source should be considered. Stock tanks are important to livestock and wildlife and typically were built to improve utilization by livestock(in consultation with the USFS Range Conservation Staff). The location of stock tanks are an integral part of managed grazing. Permittees are expected to adhere to grazing plans and removal of stock tanks could negatively alter their ability to do so.

Thank you for the opportunity to comment.

Sincerely,

Bob and Judy Prosser