



1254 N Fox Hill Road  
Flagstaff, AZ 86004  
[Hamilldsrt50@msn.com](mailto:Hamilldsrt50@msn.com)  
928 606-4234

January 16, 2020

4FRI Rim Country DEIS Team  
Coconino National Forest Supervisor's Office  
1824 Thompson Street  
Flagstaff, AZ 86001

Comments were submitted electronically to:

<https://cara.ecosystem-management.org/Public/CommentInput?project=48210>

RE: Arizona Wildlife Federation Comments on the 4FRI Rim Country Draft Environmental Impact Statement (October 2019)

Dear Sir/Ms.:

The Arizona Wildlife Federation (AWF) is a statewide non-profit organization founded in 1923 to educate, inspire, and assist individuals and organizations to value, conserve, enhance, manage, and protect wildlife and wildlife habitat in Arizona. The AWF is a signatory to the 4FRI Stakeholder Group Charter and has been an active participant in the 4FRI stakeholder process since its inception.

We appreciate the opportunity to comment on the 4FRI Rim Country Draft Environmental Impact Statement (October 2019) (DEIS). In general, AWF supports Alternative 2-The Modified Proposed Action subject to your consideration of the following comments.

The stated purpose of the 4FRI Rim Country Project that is identified in the DEIS is *"to restore and maintain the structure, pattern, health, function, and vegetation composition and diversity in ponderosa pine ecosystems...* Given the diverse community types present in the Rim Country EIS footprint, the purpose statement in the final EIS should identify **all** the community types that will be treated including riparian and aquatic systems (not just ponderosa pine).

AWF fully supports all of the comments, concerns, and recommendations outlined in the January 16, 2020 [4FRI Stakeholder Group comment letter on the DEIS](#). We believe these comments and recommendations are based on the best available science and consistent with the requirements of the Collaborative Forest Landscape Restoration Program. In particular, the following restoration issues are of high priority concern to AWF because of their importance to the conservation and enhancement of wildlife/fish populations and their essential habitats within the Rim Country project area. The final EIS should emphasize and prioritize implementation of the following actions: 1) the restoration of degraded riparian and aquatic habitats found throughout the project area; 2) the restoration and protection old

growth stands and the retention of large old growth trees which are of key importance to many wildlife species (e.g., Mexican spotted owl, Northern goshawk, Abert's squirrel, etc.). The final EIS should include a Rim Country project area assessment and plan for the protection and distribution of existing old growth and the development of future old growth stands; and 3) the restoration of healthy forest conditions in relation to management of dwarf mistletoe. The final EIS should fully acknowledge that dwarf mistletoe is a very important natural component of the Rim Country ecosystem that creates key habitat conditions (e.g., snags, witches' brooms) used by many wildlife species (e.g. cavity nesting birds, tree squirrels, bats) for nesting, roosting, cover, and feeding. The final EIS should allow for the full range of natural variability based on current science.

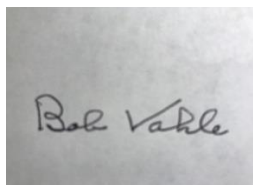
The final EIS should also incorporate (a) the information and analysis provided by the Arizona Game and Fish Department (AZGFD) on Species of Greatest Conservation Need and Species of Economic and Recreational Importance (SERI), and (b) information/maps on the areas that sportsmen value most for hunting and fishing as identified by the [Arizona Sportsmen's Values Mapping Project](#) (ASVMP). The ASVMP reflects the input from Arizona sportsmen and women about our state's most-valued places to hunt and fish. Portions of the Rim Country footprint are identified in the ASVMP as highly valued for elk, mule deer, white-tailed deer and turkey. The information was gathered specifically to give hunters/anglers a voice in Arizona wildlife management, help prioritize areas for conservation/management, and to identify areas where access should be maintained for hunting and fishing. Given the economic importance of hunting and fishing to Arizona, especially communities in close proximity to the Rim Country project, we believe the AGFD's information on SERI and the ASVMP should be included in the Final EIS and used in the planning and implementation phase of the project.

Thank you for considering our comments and for your continued support of the 4FRI collaborative stakeholder process.

Sincerely,

A handwritten signature in black ink that reads "John Hamill". The signature is written in a cursive style with a large initial "J".

John Hamill, Vice President-Conservation and Region 2 Director  
Arizona Wildlife Federation

A handwritten signature in black ink that reads "Bob Vahle". The signature is written in a cursive style with a large initial "B".

Bob Vahle, Region 1 Director  
Arizona Wildlife Federation