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Comments: DEIS Comments

My comments will largely focus on the impacts of a healthy forest as measured by healthy springs, streams, ponds, and lakes within the forest. I support Alternative 2 as the best course of action as I believe that the conditions of the forest are at an incredibly unhealthy state and require a tremendous effort, on par with alternative 2 to begin to return them to a desirable condition.
I have expressed several of these questions, suggestions, and concerns in numerous USFS 4FRI meetings and commented on them in the past in written form as well. Many of my comments could be categorized as actions to be taken in the implementation of the plan.

You need to have measures in place to assess the success of your restoration and recovery efforts. It might be clear from a tree perspective in terms of what forest type vegetation returns after an action, but the impact on wildlife and aquatic inhabitants of the forest may require a great deal more study. This can not happen after the fact.

Do you have mechanisms in place to assess the conditions of wildlife and aquatic species (including aquatic insects that will provide efficient status of stream health) throughout the plan period? Specifically, is there a planned sampling strategy to collect and assess these data as a baseline prior to actions, during remediation, and after the work is completed to assure that the efforts did no harm, and that the actions in fact improved conditions?

The aquatics toolbox is a tremendous tool that I fully support However, it is dependent on a significant knowledge base of the managers and crews in the field to make decisions about the appropriate tool to utilize under conditions that appear over the the entire forest environment. This requires a great deal of training and coordination.

What training and coordination strategies have you developed to ensure that the best tool is consistently selected, and that if there are questions about which tool or set of tools to employ that there is a strategy in place to protect the wildlife and aquatic resources that might be adversely impacted?

An important need for interdependence that is not evident in the document is the coordinated implementation of the aquatic tool box and the mechanical toolbox. They must interface and support the desired results of a healthy forest from both perspectives.
An important economical consideration would benefit from this coordination of both toolboxes with regard to heavy equipment, temporary roads, and available timber. Work done that supports mechanical removal, could be used to provide resources and placement of stream improvement devices (including timber) at the same time.
What mechanisms or strategies will you implement that cause managers and crews to be sure that their projects have followed the guidelines of BOTH toolboxes where appropriate?

This is not an idle concern. I have attended 4FRI stakeholder meetings where it has been shared by managers that they were fortunate to have escaped a disastrous situation or that they had a "lucky break" that a contractor stopped and made a contact prior to an action that would have been harmful. The descriptions did not leave a great deal of confidence that there are effective procedures in place to see that it is not luck that keeps bad

things from happening, but rather effective planning and well-written contracts that specify procedures and define significant liabilities for inappropriate actions.

What have you done to ensure that contractors WILL NOT proceed without authorization, effective training, and a clear understanding of the significant liabilities if they are found to have acted irresponsibly and have caused damage to the forest, preferred habits, or its inhabitants?

There are efficient ways to do the work, ways to maximize more money from bidders, and ways that prioritize the needs of the forest and attending to the most hazardous conditions first. The RFP for bidders to attend to biomass removal is an example of addressing a critical need of the forest condition and reflects action on the USFS to look at a high priority condition. Thank you.

An example from a removal perspective in terms of protecting streams and watersheds would be to do the work from the top of the watershed down rather than in the reverse direction. The rationale to this is that if the top of the watershed is last to be treated and a fire rips through prior to completion of the work, the watershed is ruined. In this situation, the stream is destroyed, and restoration costs as well as the ability to reintroduce desired native species could be severely impacted and may take decades to recover sufficiently.

There are numerous examples of the power of moving water as a result of fire damage in our state: Frye Creek, the human loss of life on the East Verde River near Water Wheel outside of Payson, and fires around Flagstaff. The Museum Fire is a recent example that although the intentions were good to be preventative, the piling of product for later removal seemed a contributing factor in the final acreage of the fire footprint. Logically, working up the hill and utilizing cleared space or temporary roads for removal makes sense, but work done downstream does not protect the watershed as effectively as work done upstream first. The power of water rushing down unprotected slopes destroys both the upstream and downstream areas in the watershed.

What is the plan for actions within a watershed? If they are not specified to work from upstream to downstream, what will you do to escalate the work schedule and minimize the potential for watershed devastation while the watershed is being treated?

In meetings that I have attended, there is very limited information on the implementation phase of the plan. It seems to fall within the discretion of the district rangers of each forest. That is disconcerting because it is obvious that there are marked differences in the effective management of each forest. An additional troubling aspect to this concern is the frequent movement of management personnel within the USFS. There needs to be a clear direction that prioritizes the action from an overseer of the needs of the entire footprint. In other words, if there are clear critical needs of a particular region within the Rim Country Project, then resources must be directed there first, not just an allocation of all resource funding equally distributed to all the forest in the footprint.

How will specific restoration projects be prioritized and adequate resources be allocated over the entire footprint of the project?

What mechanisms will you utilize to ensure that there is adequate training of personnel and a defined set of prioritized steps if/when personnel are transferred to minimize disruption of restoration efforts?

There seems to be a need for a sequential approach to such a massive undertaking, but if that is the case, there has been little to no evidence of that shared with the public to this point. The benefits of that sequential approach would allow for attention to the most critical areas, an ability to seek necessary biological opinions on the targeted areas, and a plan to build on restoration actions based on the actions performed immediately prior.

Is there a sequential nature to the implementation plan? If so, what is it and what drives that sequence?

Is there a plan to attend to watersheds with the possibility of negative impact on human habitation (water sources for towns, likely fire path to communities) first?

Will watersheds with threatened and endangered species be given preferential treatment schedules to ensure that there is less risk to these species or recovery efforts of protected species? If so, do aquatic or water dependent species have the same status in this plan as other well-known endangered species?

Earlier I noted the RFP that considers applicants based on their percentage of biomass removal as part of their proposals. This is a great strategy, but given the poor track record the the USFS has had with contracting for effective biomass removal on a large scale, there remains a real concern that this effort could fail too.

What plans do you have if the bidders do not meet the biomass removal quotas that you intend?

Will that mean a lengthy redesign of the RFP and bidding process? If so, that is unacceptable and you need to have a plan to address the biomass removal plan internally. The health of the forest cannot afford any additional delays.

The final comment is about funding. This process to restore and protect the forests in northern Arizona has taken much too long to get to this point. The scary part is that this point does not begin to effectively reduce the risks that those unhealthy forest conditions cause to our forest and communities. Simply completing the necessary paperwork to move the process along is not enough. To have this book on the shelf does not attend to the needs to actively clean up the forest. There needs to be adequate funding and/or reprioritization of the existing funding to take care of this dangerous situation.

What is the funding status of this Rim Country Project?

When will the work be completed?

What actions are being taken by the USFS leadership to inform Congress and the Administration about the high risk needs of this area? Related to this, as this budget is shared, is the cost of recovery due to inaction presented as a metric in the calculations to determine funding response?

What partnerships are you engaging with in the area to begin work that may be supported outside federal funding capabilities?

Thank you for you consideration of my comments, concerns and suggestions.