Data Submitted (UTC 11): 10/5/2016 7:00:00 AM
First name: Bill
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Organization:
Title:
Comments: Four Forest Restoration Initiative Rim Country EIS Some areas that I think you may wish to[middot] consider as you go forward with this project are: Be prepared to "adaptively manage" this operation. Make allowances for learning to improve actions. We do not know everything and the actions we take may or may not work. Be flexible. Additional roads together with the many existing roads and trails, increases the opportunity for access to the project area for off-road vehicles after completion of treatments and the mitigation measures have been employed. Although you have indicated several mitigation measures proposed for roads and trails in the area, these can be quickly negated if sufficient enforcement measures are not used. This could lead to the very problems your mitigation measures are intended to prevent, e.g., erosion of soils and deposition, wildlife habitat disturbances, etc. Treatments vary in their impacts to streams. How are stream values incorporated into decisions to go with various treatment methods? How do you propose to prioritize MSO PAC treatment methods with those needed to protect streams? What does it mean to "restore" 350 miles of stream "habitat?" Vegetation clearing will result in more wanning of waters in Arizona even with maintenance of riparian corridors. How can you clear and thin vegetation while maintaining stream water temperatures? You mentioned the use of antelope as an indicator species and this works for terrestrial habitats; however, you need indicator species for aquatic habitats as well. We suggest use of EPT organisms as indicators of impacts of your actions on stream health but don't see this as an integral part of the project. Monitoring their presence before, during and after the treatments will provide vital data for adaptively managing the treatments. Timing of tree removals and prescribed burns no doubt will overlap critical nesting periods for MSOs. It would seem that winter activities when sufficient snow is available may be the best time to conduct such operations as this would avoid their nesting period and reduce erosion potential. Obviously, monitoring of nest sites before, during and after operations is a critical action. The intensity of prescribed burns must be a consideration. Too many ground fires over small areas may result in excessive ash that could be washed into the reservoir. We assume the prescribed ground fires will be spaced out, spatially and temporally, to avoid this potential problem. Although much of the area is relatively flat, there are many small channels and valleys that conduct fair volumes of water during precipitation events. Logging activities that result in yarding on the fall line into these valleys could exacerbate erosion of soils despite your efforts to mitigate this with seeding, mulching, etc. Even slight deviations from the fall line may help prevent many erosion issues. Also, these trails can, and probably will, be used by off-road vehicles after the project is completed, unless maximum effort is made to discourage and prevent it. The inventory of species in the project area needs to be examined closely for potential the listings or other sensitive species. Using mitigation measures that can help a group of species associated with similar habitats may be a prudent approach and one that could prevent more stringent measures being required later on. The speed at which this project can be conducted is critically important to all of us. It is necessary to involve many in conducting this project but this should not result in stagnation due to an increasing bureaucracy. Please keep your eyes on the goal and not let the need to collaborate, mediate and compromise deny all of us the urgently needed protection this project will provide. Actions on the 4FRI should be collaborated with local communities. Your actions may be compromised if similar efforts are not employed within local communities with forest thinning issues. Not sure how this gets accomplished but in should be considered a necessary part of the entire effort.