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Comments:

August 11, 2016

Annette Fredette, 4FRI Planning Coordinator

Coconino National Forest

1824 S. Thompson St.

Flagstaff AZ 86001

Re: Scoping comments on the 4 FRI Rim Country Proposed Action (June 2106).

Dear Ms. Fredette:

The Arizona Wildlife Federation (AWF) is the State's oldest wildlife conservation organization. The AWF is a 501(c) 3 non-profit corporation that was founded in 1923 to take politics out of Arizona's Game and Fish Management and to promote the management of Arizona's wildlife and natural resources based on the principles of 'sound science'. The AWF got its start as the Arizona Game Protection Association and celebrated 93 years of Arizona conservation activity in 2016.

Please consider the following comments on the June 2016 Four Forest Restoration Initiative (4FRI) Rim Country EIS Proposed Action.

\* Project Objective, Purpose and Need - The AWF strongly supports the objective of the Rim Country Proposed Action "to reestablish and restore forest structure and pattern, forest health, and vegetation composition and diversity in ponderosa pine ecosystems to conditions within the natural range of variation, thus moving the project area toward the desired conditions. We believe that a healthier more resilient forest will provide more sustainable benefits to wildlife and to the citizens of Arizona.

\* Place more emphasis on Wildlife - Arizona is blessed to be a sportsmen's paradise. More than 2 million Arizona residents and nonresidents enjoy hunting, fishing and wildlife viewing here every year, contributing \$2.4 billion to the state economy. To ensure these traditions can be passed along to the next generation, sportsmen are actively restoring habitat across the state for elk, pronghorn, mule deer, quail, turkey, bighorn sheep, and native trout. The Proposed Action should include wildlife habitat restoration needs and actions for all species not just federally protected species. We also recommend that the Purpose and Need should be expanded to include "Support quality hunting and fishing opportunities". The proposed action and treatments should emphasize actions that will improve terrestrial and aquatic habitat conditions, maintain/restore functioning wildlife migration corridors, and provide reasonable access. In addition, the Proposed Action should address increasing wildlife diversity by increasing spatial heterogeneity of habitat components for both aquatic and terrestrial wildlife.

\* Emphasize wildlife waters - Many wildlife waters (including tanks, water collection aprons, drinkers, etc.) in the project area have been degraded or are no longer functioning due to damage from catastrophic wildfire or lack of maintenance. These waters need to be repaired (i.e., sediment removal) or replaced. For waters that are exclusively wildlife waters, exclusion fencing may need repair or replacement to keep livestock out. There are other areas of wildlife habitat that have been identified for the installation of new waters. These repairs, replacements, and installations will improve habitat for wildlife and improve wildlife distribution across the landscape.

\* Emphasize wildlife connectivity and migration corridors - The State of Arizona participated a few years

ago in a wildlife corridors project of the Western Governors Association. Maps of important corridors were developed and should be utilized in this analysis. An objective of the Proposed Action should be to create and restore wildlife corridors through thinning to connect wildlife habitat blocks on the landscape. For example, emphasis should be placed on mechanical treatments that will maintain and/or restore montane meadow connectivity through the removal of trees, including juniper and large young trees where wildlife travel corridors have been identified. Within the Rim Country project area, fence improvements and modifications would benefit wildlife through increasing wildlife connectivity on the landscape. For example, unnecessary fences need to be removed to allow wildlife to move through important movement corridors between habitat blocks. There are also other fences that require repair to keep livestock within allotments and protect sensitive wildlife resources. Wildlife would also benefit from wildlife friendly modifications to other fences that would retain livestock while allowing wildlife to cross.

\* Clarify the linkages between the Travel Management Plans and the Rim Country EIS - It is not clear to us how the Travel Management plan for the area will be coordinated with the Rim Country EIS. The proposed action details specific road decommissioning targets. If the Rim Country EIS intends to supersede the Travel Management planning process it should be clearly specified.

\* Ensure that riparian areas and watersheds are adequately analyzed and protected - Some of the most storied and productive Coldwater fisheries in Arizona lie within the project area. These streams also provide vital water sources for thousands of people in the State. The project area is home to native Gila trout that are important from both a conservation and recreational perspective. We would like to see these water resources protected. The proposed forest restoration combined with thoughtful hydrologic rehabilitation can produce resilient, sustainable, and highly functioning watersheds that support both native and recreational fisheries. All perennial, ephemeral, or intermittent streams (not just those identified in Figure 6, page 19) should be considered for restoration and or improvements. Not all of these streams may need restoration or special treatment, but the EIS should provide the necessary guidance if restoration or special treatment is deemed appropriate. Prior to mechanical or fire restoration treatments, the hydrologic impacts of the treatment to streams, aquatic ecosystems, and riparian areas should be formally evaluated. Treatments should be adjusted to avoid or mitigate adverse impacts when matched with complimentary hydrologic rehabilitation.

Thank you for your work on restoring our National Forests and accepting our comments. Please contact me if you have questions or need additional information.

Sincerely,

Bradley Powell  
President Arizona Wildlife Federation