



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

5000 W. CAREFREE HIGHWAY
PHOENIX, AZ 85086-5000
(602) 942-3000 • WWW.AZGFD.GOV

REGION II, 3500 S. LAKE MARY ROAD, FLAGSTAFF, AZ 86001

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March 14, 2011

Earl Stewart, Coconino National Forest Supervisor
Michael Williams, Kaibab National Forest Supervisor
Attn: 4FRI
1824 South Thompson Street
Flagstaff, Arizona 86001

RE: Four Forest Restoration Initiative – Coconino and Kaibab National Forest Proposed Action

Dear Supervisors Stewart and Williams,

The Arizona Game and Fish Department (Department) appreciates the opportunity to comment on the Four Forest Restoration Initiative (4FRI) – Coconino Kaibab National Forest Proposed Action (PA). The Department is an active member of the 4FRI Stakeholders Group and supports landscape-scale restoration of ponderosa pine ecosystems to protect communities, restore wildlife habitats, and enhance rural economies in northern Arizona.

The PA proposes to conduct restoration activities within a 750,000-acre ponderosa pine ecosystem over approximately 10 years. Restoration activities proposed include mechanical tree thinning, prescribed fire, riparian protection/rehabilitation, and decommission/obliteration of closed or user-created roads. Activities are proposed on the Williams and Tusayan districts of the Kaibab National Forest and the on the Flagstaff, Mogollon Rim, and Red Rock districts of the Coconino National Forest (hereafter, Forests). The US Forest Service 4FRI Team held 5 workshops during February 2011 to share the draft PA and collect comments from the public. We thank you for this high level of collaboration with the Department and the 4FRI Stakeholders Group. The Department attended all of these workshops and submitted many comments, questions, and recommendations in that forum. It is our understanding that a refined PA may be forthcoming, and we look forward to seeing how our input has been incorporated in this refinement.

The purpose of this letter is to highlight some key issues; however we ask that you consider not only comments contained herein, but also those in which we provided during the workshops.

Comprehensive Ecological Restoration

As stated in the PA, “this project is expected to put the analysis area on a trajectory towards comprehensive, landscape-scale restoration with benefits that include improved vegetation biodiversity, wildlife habitat, soil productivity, watershed function, and an opportunity for the safe use of managed fire.” The Department strongly supports this purpose; 4FRI is intended to be comprehensive restoration. This PA moves us a lot closer to that ultimate goal, however it does not (and feasibly could not) tackle all of the causes of ecological decline in our ponderosa pine ecosystems. The Department would like to work collaboratively with all four national

forests in 4FRI (Coconino, Kaibab, Apache-Sitgreaves, Tonto) and the 4FRI Stakeholders Group on a comprehensive restoration assessment. This assessment could identify possible management actions that focus on a wider range of forest resources than just timber and fire; such as hydrology, range, recreation, and wildlife. We envision an outcome of this assessment being a menu, or list, of comprehensive restoration activities that could be tackled over time, not only by the Forests, but also by stakeholders and other partners. This assessment would set forth a collaborative program of work with benefits for wildlife and forest users. We would like to begin working with you on this assessment as soon as possible.

And since this project is intended to achieve ecological restoration, we would also like the Forests to elaborate on how conventional silvicultural treatments described in the PA will be applied and/or adapted to achieve ecologically-based restoration objectives.

Landscape Scale to Site Specific Scale

Planning a restoration project at the 750,000-acre scale is unprecedented in Arizona. And while we can all envision achieving restoration at the landscape scale, we must analyze the effects to wildlife and other resources at the site-specific scale. Transitioning from landscape-scale goals to site-specific plans is difficult at best, and the Department recognizes the challenges faced by the Forests in doing so. As such, desired conditions for this project are extremely important. The Department agrees with all of the desired conditions stated in the PA, and we also recommend consideration of the desired conditions from the *Landscape Restoration Strategy for the First Analysis Area - Report from the Four Forest Restoration Initiative Stakeholder Group to the USFS 4FRI Planning Team (October 2010)*. We also encourage the Forest to consider the desired conditions as described in the *DRAFT Desired Ponderosa Pine Forest Conditions for Wildlife in Arizona* paper currently undergoing revision by the Department, the US Fish and Wildlife Service, and the Ecological Restoration Institute. Your 4FRI Team already has a copy of this document.

Desired conditions are a good starting point for understanding what forests will look like after proposed restoration treatments are implemented. However, we are seeking greater specificity in your approaches to mechanical treatment. During the workshops, we learned that the Forests are proposing 5 treatment types (grassland, savannah, uneven aged, stand improvement, and intermediate thin). We also learned that these treatments will vary in terms of the percent in an open (non-forested) condition (10-25%, 25-40%, 40-55%, 55%+, 70-90%, and 90%+). While the desired conditions do state that the forested portions should be comprised of uneven aged trees in a clumpy-groupy structure, the PA lacks detail at finer scales. We are not asking for site-specific prescriptions, rather, we are seeking greater detail in the descriptions of what the forests will look like after treatment. For example, we would like a better understanding of targeted ranges for tree group size, basal area, trees per acre, and stand density index. The proposed action would also benefit from an expanded discussion of how to achieve vertical and horizontal heterogeneity in forest structure; an important component of wildlife habitat as well as an important characteristic of developing old growth forest.

The Department strongly supports the inclusion of riparian and ephemeral channel restoration in the PA. However, the PA currently lacks specificity on where and how this will be achieved.

Wildlife Recommendations

It is our understanding that the maps displaying proposed silvicultural treatment approaches have yet to be filtered for wildlife factors such as Mexican spotted owl (MSO) protected activity centers (PACs), MSO restricted habitat and target/threshold habitat, northern goshawk nest cores and post-fledgling family areas, as well as the AGFD – Coconino County Wildlife Corridor Project information. We predict that the inclusion of these wildlife features will alter the layout and design of the proposed silvicultural treatments and we are hoping to have the opportunity to review these new maps in the refined PA.

Without having those refined wildlife-silviculture maps to review, our initial reaction to the proposed treatments is that overall they seem reasonable based on the methodology described by your silviculturalist during the workshops. However, the majority of the treatments appear to be in the uneven-aged, 40-55% open category and this particular treatment occurs in large, contiguous swaths across some of the Firescapes where heterogeneity in forest condition is particularly important for wildlife. We fully support uneven aged treatments, but would recommend the Forests consider additional heterogeneity in the percent open condition. Greater spatial variability in forest density will provide a broader range of habitat conditions for the diverse wildlife species that occur across the two Forests. For treatments that occur on mollic intergrade soils, consider using topography and aspect to increase heterogeneity, allowing for more treatments in the 10-25% and 25-40% open category. Inter-mingling these different treatment intensities across the landscape will better help to provide habitat heterogeneity for wildlife at the landscape scale.

As evidenced by the length of discussions during the workshops, interpretation of the northern goshawk guidelines (as per the 1996 Amendment to the Forest Plans) remains an issue. The Department recommends further exploration of how the shift from measuring forest canopy cover at the group level versus the stand level will impact wildlife. Perhaps more important than any percent canopy cover measurement is a clear description for how canopy interconnectedness, vertical heterogeneity, and group size variability will be achieved at various scales. The Department would like to continue to work with the Forests and stakeholders on this issue.

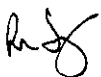
Importance of Monitoring, Research, and Adaptive Management

We cannot overemphasize the critical importance of monitoring and adaptive management in 4FRI. The 4FRI Stakeholders Group developed an initial monitoring framework that is a good starting point for discussion. We encourage the Forests to build upon this effort and work collaboratively with the Department and other stakeholders to develop a robust, science-based, realistic monitoring plan with clear thresholds that trigger changes in management. Scaling up our restoration effort means scaling up our impact on wildlife and other resources; as such, we need a complementary scaling up of our monitoring efforts.

The Department also recognizes the 4FRI effort as a key opportunity to increase our understanding of forest restoration's impacts to wildlife. We would like to begin working collaboratively with the Forest and 4FRI Stakeholders to capitalize on wildlife-based research opportunities.

Again, the Department thanks you for working closely with us and other stakeholders in the 4FRI planning efforts to date. This is an ambitious project with clear ecological and social benefits. We are committed to working with you through the planning, implementation, monitoring, and adaptive management phases of this project to ensure positive outcomes for wildlife and the public. Thank you for the opportunity to comment on the PA. If you have any questions or need further clarification, please do not hesitate to contact Sarah Reif, Habitat Program Manager in Region II, at 928-214-1253 or sreif@azgfd.gov.

Sincerely,



Ron Sieg
Regional Supervisor