

## COMMENTS OF THE GRAND CANYON TRUST

### ON THE PROPOSED ACTION AND NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT FOR THE FOUR FOREST RESTORATION INITIATIVE:

#### COCONINO AND KAIBAB NATIONAL FORESTS, ARIZONA

##### I. INTRODUCTION

On January 21, 2011, through correspondence, the Kaibab and Coconino National Forests released a proposal to conduct restoration activities within a 750,000 acre ponderosa pine ecosystem over approximately 10 years (the “Project”). This correspondence included a brief description of the purpose and need for the Project and the proposed action for the Project (“Proposed Action”). On January 25, 2011, the U.S. Forest Service (“USFS”) published in the Federal Register, at 76 Fed. Reg. 4279, a Notice of Intent to Prepare an Environmental Impact Statement for the Project (“NOI”), which also included a description of the purpose and need for the Project and the Proposed Action. The Proposed Action for the Project would implement treatments – mechanized operations to cut trees and prescribed burns to maintain desired openings and interspaces between trees – across the Williams and Tusayan districts of the Kaibab National Forest and the Flagstaff, Mogollon Rim, and Red Rock districts of the Coconino National Forest.

The Grand Canyon Trust (“GCT” or the “Trust”) respectfully submits these comments on the Proposed Action and the scope of the analysis to be conducted in the environmental impact statement. The Trust is a nonprofit organization that focuses on the protection and restoration of the Colorado Plateau – its spectacular landscapes, flowing rivers, clean air, diversity of plants and animals, and areas of beauty and solitude. Since 2009, the Trust has been an active member of the Four Forest Restoration Initiative Stakeholder Group (the “Stakeholder Group”), a collaborative group of more than 30 organizations, municipalities, institutions, and agencies focused on carrying out landscape-scale forest restoration efforts across 2.4 million acres of the Mogollon Rim in Northern Arizona, including the Project area. Additionally, GCT staff and members regularly use and enjoy areas of the National Forests within the Project area.

##### II. COMMENTS

The Trust strongly supports the USFS’s desire to reestablish the resilience and function of northern Arizona’s ponderosa pine ecosystems and commends it on taking monumental steps towards achieving this goal. We believe it is vital that forest structure be restored to these ecosystems, thereby allowing for the reintroduction of fire into wildland forests in a way that is safe, socially acceptable, and protective of wildlife and native biological diversity. To be successful, GCT believe that restoration efforts must be ecologically, economically, and socially viable.

The Trust believes that the Proposed Action provides a general framework for accomplishing successful forest restoration efforts. However, the Trust encourages the USFS to elaborate and refine its plan for forest restoration activities by completing a revised Proposed Action prior to beginning its analysis of the Proposed Action. Specifically, GCT respectfully requests that the USFS develop a revised

Proposed Action that includes (1) a plan for strategically locating mechanical treatments, (2) a more detailed description of how mechanical treatments will modify forest structure and accommodate reintroduction and/or management of fire, (3) an explanation of how silvicultural decisions regarding the removal of large and old-growth trees will be made (integrating recommendations offered within the Old Growth Protection and Large Tree Retention Strategy), and (4) an explanation of how heterogeneity of forest structure will be achieved at various scales across the landscape.

#### A. Strategic Placement of Treatments

The broad-scale application of rule-based silvicultural treatments in the Proposed Action places potential mechanical treatments across a majority of the landscape and is not representative of a more socially acceptable desire to implement strategically placed mechanical treatments across approximately 300,000 acres of the landscape. In 2007, a 20-member collaborative working group held a series of meetings using a participatory GIS process to develop ecologically appropriate and socially acceptable treatment scenarios for forest restoration activities.<sup>1</sup> This working group determined that the most socially acceptable approach for implementing mechanical thinning treatments across the landscape, the “consensus scenario,” involved strategically placing treatments in a manner that protected valuable resources and created a fire-permissive landscape. Using this approach, the group identified approximately 330,000 acres of ponderosa pine forests in the project area that could receive mechanical treatments.

Not including projects already planned in the Project Area, the Proposed Action identifies approximately 656,000 acres of additional ponderosa pine forests for mechanical treatments. Based on acreage alone, this is approximately twice the amount of area that was previously found to be socially acceptable for receiving mechanical treatments. Furthermore, the placement of the mechanical treatments in the Proposed Action is not explicitly driven by considerations relating to the protection of valuable resources or the creation of a fire-permissive landscape. Therefore, GCT is concerned that the current amount and placement of mechanical treatments in the Proposed Action does not reflect a social license generated over the previous several years, and will not be socially acceptable.

The Trust suggests that the USFS revise its Proposed Action by identifying a more socially acceptable level of strategically placed mechanical treatments across the landscape. Going beyond the Proposed Action’s broad-scale application of rule-based silvicultural treatments, we suggest that the USFS identify and propose treatments in areas where mechanical treatments would protect resources of value, reduce the risk of occurrence of crown fires larger than 500 acres, and create a landscape that can safely accommodate natural and prescribed fire. Additionally, we believe that the USFS should analyze, as an alternative approach, a less-intense mechanical approach that would focus on mechanically treating those forest stands that, in their current state, cannot be safely treated with fire as an initial tool. We believe this alternative approach may accomplish much of the purpose and need of the Project at a

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<sup>1</sup> Hampton, H.M., S.E. Sesnie, B.G. Dickson, J.M. Rundall, T.D Sisk, G.B. Snider and J.D. Bailey. 2008. Analysis of Small-Diameter Wood Supply in Northern Arizona. Forest Ecosystem Restoration Analysis Project, Center for Environmental Sciences and Education, Northern Arizona University.

lower cost, with a greater degree of social acceptability, and with fewer potentially negative environmental consequences.

Additionally, we understand that logistical constraints may require the USFS to identify more acres for potential mechanical treatment than are actually expected to be treated. To address this issue, we believe that it could be appropriate for the USFS to expressly state that it will only mechanically treat a specific percentage of the area identified for potential mechanical treatments in the Proposed Action.

#### B. Forest Structure Modification

The Proposed Action proposes 14 different mechanical treatment approaches in ponderosa pine forests: (1) intermediate thinning with 10-25% residual openings; (2) intermediate thinning with 25-40% residual openings; (3) intermediate thinning with 40-55% residual openings; (4) intermediate thinning with >55% residual openings; (5) stand improvement with 10-25% residual openings; (6) stand improvement with 25-40% residual openings; (7) stand improvement with 40-55% residual openings; (8) stand improvement with >55% residual openings; (9) uneven-aged treatment with 10-25% residual openings; (10) uneven-aged treatment with 25-40% residual openings; (11) uneven-aged treatment with 40-55% residual openings; (12) uneven-aged treatment with >55% residual openings; (13) savanna restoration; and (14) grassland restoration. Although GCT appreciates that these various mechanical treatments types identify the general treatment approach and the amount of area that will remain in forest cover, they do not discuss how treatments will modify the structural or spatial characteristics of the forest cover. The Trust believes that knowledge of the structural and spatial characteristics of the remaining forest cover are crucial to understanding how mechanical treatments will affect ecosystem processes, wildlife populations, and social acceptability of the Project.

The Trust suggests that the USFS revise its Proposed Action by providing a more detailed explanation of how various treatment approaches would modify the structural and spatial characteristics of remaining forest cover. Specifically, we suggest that the revised Proposed Action clarify information for each treatment approach regarding (1) the size of tree groups and openings; (2) the range of basal areas and tree densities remaining within tree groups; (3) the distribution of tree size classes within groups, stands, and treatment areas; and (4) the range of canopy cover at the group level, stand level, and treatment area level. We believe that these structural and spatial descriptions of the forested areas or tree groups would provide the public with a better understanding of the result of mechanical treatments and allow for a more comprehensive analysis of the effects of mechanical treatment on wildlife populations and ecosystem processes.

#### C. Large and Old-Growth Trees

The Trust appreciates the USFS's desire to "promote large trees" and that treatments under the Proposed Action would be "designed to manage for old age trees in order to have and sustain as much old forest structure as possible across the landscape." However, GCT is concerned that these aspirational statements do not provide sufficient clarity or assurances regarding one of the most socially contentious issues associated with forest restoration projects. We believe that the Proposed Action should be revised to clearly and unambiguously state that a collaboratively developed strategy will be

implemented and operationalized to protect all old-growth trees and retain as many large trees as possible across the landscape.

The Stakeholder Group has collaboratively developed and submitted to the USFS an Old Growth Protection and Large Tree Retention Strategy. This document reflects agreement between a diverse group of environmental conservation organizations, scientists, agencies, and industry representatives on how old-growth trees should be protected and large trees should be retained during the implementation of this Project. The document identifies the actions that should be taken to protect and retain large trees in almost every situation that would be encountered during the implementation of this Project.

The Trust believes that the incorporation of the Old Growth Protection and Large Tree Retention Strategy into the Proposed Action will greatly enhance the social acceptability and ecological appropriateness of the Project, and its overall success. We therefore urge the USFS to revise the Proposed Action to include this collaboratively developed document or explicitly state that the document would be implemented and operationalized through the Project.

#### D. Heterogeneity

The Proposed Action states a goal of attaining “greater diversity (heterogeneity) in spatial patterns and size class distribution.” The Trust strongly supports the goal of creating heterogeneity at all scales across the landscape (e.g., within and among tree groups, stands, treatment areas, firescapes, and the Project area). We believe that heterogeneity is crucial to sustaining biodiversity and provides a necessary foundation for adaptation and resilience. We also believe that scientific uncertainty regarding the effects of landscape-scale restoration projects on ecological processes and wildlife populations demands the creation of a heterogeneous landscape, which can be monitored for treatment effects. The consequences of over applying an “incorrect” treatment approach to a large area are substantial.

To achieve heterogeneity at all scales across the landscape, GCT believes that the Proposed Action should be revised to redistribute mechanical treatments across the landscape for the express purpose of creating a heterogeneous landscape. Currently, the Proposed Action proposes to treat several large areas of the Project Area with mechanical treatments that have similar resulting forest structures (e.g., treatments with the same level of residual openings). This current placement of mechanical treatments is likely to create a homogenous forest structure across large swaths of the Project area.

The Trust recognizes that additional landscape-level heterogeneity will be introduced through specific wildlife treatments (i.e., Mexican-spotted owl treatments), deferral areas (e.g., Wilderness areas and steep slopes), mixed landownership, and other factors; however, we believe that heterogeneity should be an affirmative goal at all levels and not just a result of exclusion circumstances. As the Proposed Action is refined, we believe that the USFS should continually reevaluate the effect of the Proposed Action’s mechanical treatments on heterogeneity at all scales to ensure that it is achieved.

### III. CONCLUSION

The GCT appreciates the opportunity to comment on the Proposed Action. We believe that the completion of a revised Proposed Action that includes the elaborations and refinements discussed above will help the USFS conduct an environmental analysis for forest restoration activities that enjoys a greater level of social acceptability.

Sincerely,

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