

Four Forest Restoration Initiative: Rim Country EIS

Fire Ecology Specialist Report

Prepared by:

Maximillian Wahlberg, Fire Ecologist, USDA Forest Service

Jessica Haas, Ecologist, Rocky Mountain Research Station

Mary Lata, Fire Ecologist, USDA Forest Service

Scott Williams, Fire Management Specialist, USDA Forest Service

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Introduction/Project Information

The Four Forests Restoration Initiative (4FRI) Rim country EIS proposes ecosystem restoration efforts on 1,240,000 acres of land across the ponderosa pine (*Pinus ponderosa*) forest located across the Mogollon Rim of Northern Arizona (Figure 1). Ponderosa pine and dry mixed conifer frequent-fire forest types are the target cover types for restoration within this project. Most frequent-fire forests throughout the Intermountain West have been degraded during the last 150 years. Many of these forests are now dominated by unnaturally dense thickets of small trees, and lack their once diverse understory of grasses, sedges, and forbs. Forests in this condition are highly susceptible to damaging, stand-replacing fires and increased insect and disease epidemics. Restoration of these forests centers on reintroducing frequent, predominantly low-severity surface fires—often after thinning dense stands—and reestablishing productive understory plant communities (Huffman *et al.* 2018). The purpose is to move the project area toward the desired conditions established in the land and resource management plans of the three forests found in the project area (Apache-Sitgreaves, Coconino, and Tonto National Forests).

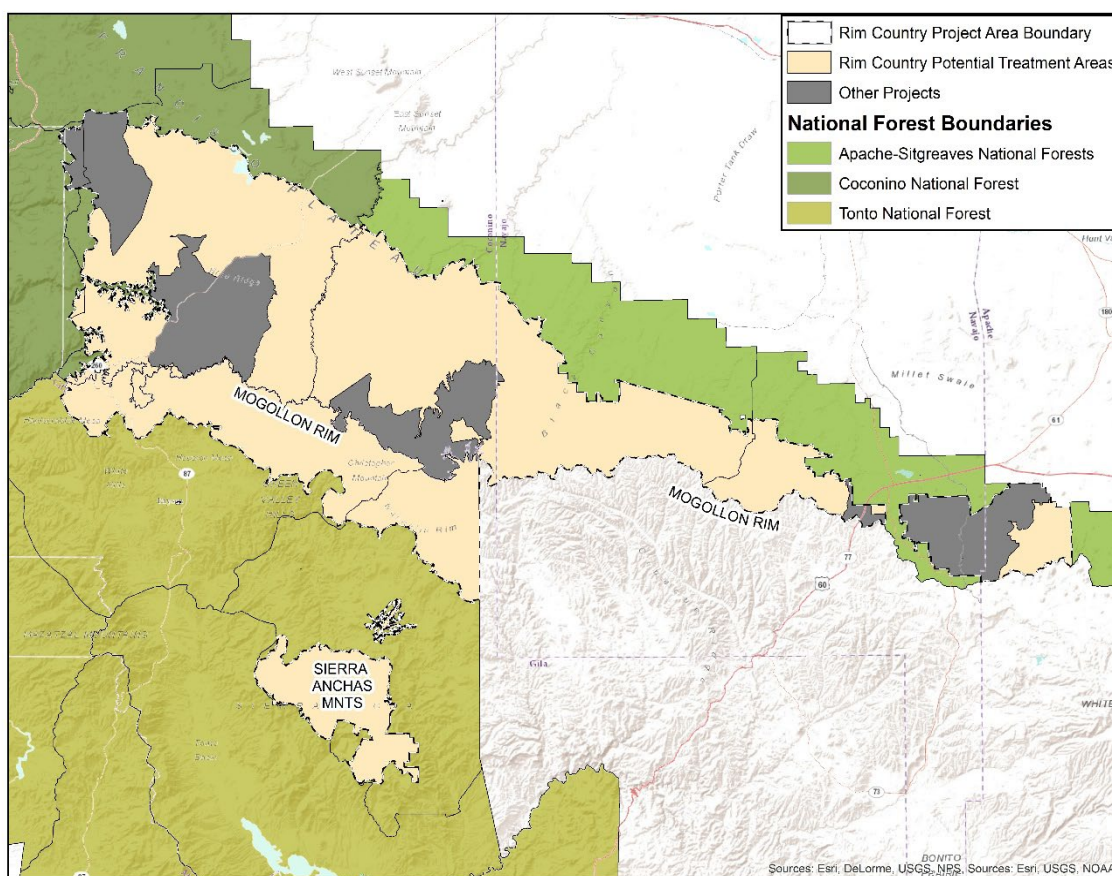


Figure 1: Project Area Location. Greyed out areas are those areas within the project area that have current NEPA projects, and are not being fully re-analyzed in this report.

One of the desired outcomes of the 4FRI restoration initiative is to reduce the risk of undesirable fire effects associated with stand replacing, high severity fire. Wildfires resulting in large-scale, high-severity fires where historically rare across the 4FRI landscape; however they are becoming more common due to uncharacteristic stand structure and prolonged drought (Covington and Moore 1994; Fulé *et al.* 1997; Hessburg and Agee, 2003). These uncharacteristic wildfires pose a

threat to human safety, highly valued resources and assets and ecosystem function. Increasing landscape heterogeneity decreases the likelihood of large scale high severity fires (Graham, et. al. 2004; Hessburg and Agee, 2005; Finney, McHugh and Grenfell 2005), increases opportunities for greater biodiversity (Strahan, 2015), and ultimately increases the opportunities for the necessary reintroduction of characteristic wildfire to fire prone areas (Hessburg et al. 2016; North et al. 2015b; Prichard et al. 2017; Thompson et al 2018).

In order to increase heterogeneity a broad range of prescribed fire and mechanical treatments will be needed to alter forest structure and allow for more characteristic large-scale, low-intensity fires to occur (Hessburg and Agee, 2005). Prescribed fire is effective at reducing subsequent wildfire severity and protecting adjacent areas especially on the lee side of treatments (Graham, 2003; Weatherspoon and Skinner, 1995; Finney, McHugh and Grenfell, 2005). However, prescribed fire alone has some limitations in its ability to alter forest structure (Vaillant et. al., 2009), and may in some cases result in negative effects such as post fire mortality of old growth trees (Collins, et.al., 2014; Roccafort et al, 2015) and unpredictable fire behavior that is difficult to control (Zimmerman, 2003). Additional challenges to using fire (both wildfire and prescribed fire) on a landscape scale include narrow burn windows, smoke impacts, and 100,000s of thousands of acres of forests too overgrown to manage appropriately with fire alone. A combination of mechanical thinning and prescribed fire will help produce the desired heterogeneity; however mechanical treatment alone is not a substitute for prescribed fire. The ecological benefits of wildfire on the landscape expand well beyond reduction of wildfire severity. The nutrient cycling, vegetation regeneration and habitat formation resulting from wildfires cannot simply be replicated by mechanical treatments.

This report focuses on the effects of management actions proposed in each alternative in regards to fire behavior and fire effects. The effects of fire include smoke and emissions, which have ecological effects as well as effects on air quality.

Relevant Law, Regulation, and Policy

National Level Direction

Federal laws, regulations, and policies affecting fire and Air Quality in regards to the Rim Country analysis include:

Organic Administration Act, June 4, 1897 (16 U. S.C.551): This act authorizes the Secretary of Agriculture to make provisions for the protection of national forests against destruction by fire. Treatments proposed by Rim Country would support the intent of the Organic Administration Act by reducing the potential for undesirable fire behavior and effects.

National Environmental Policy Act of 1970: Compliance with this act requires analysis of proposed actions, including prescribed fire, so an analysis of the effects of prescribed fire as well as the resulting emissions are included as part of the documents.

Omnibus Public Land Management Act of 2009: Established the Collaborative Forests Landscape Restoration Projects. One of the purposes of the CFLRP is to “*facilitate the reduction of wildfire management costs, including through reestablishing natural fire regimes and reducing the risk of uncharacteristic wildfires...and demonstrate the degree to which various ecological restoration techniques affect ...wildfire activity and management costs.*” In addition projects should demonstrate how they “*reduce the risk of uncharacteristic wildfire, including through the use of fire for ecological restoration and maintenance and reestablishing natural fire regimes,*

where appropriate.”

Federal Wildland Fire Policy of 1995 (Updated in 2001): The principle document guiding fire management on Federal lands. The Policy was endorsed and implemented in 1995. The 1995 Federal Wildland Fire Policy was reviewed and updated in 2001 (Review and Update of the 1995 Federal Wildland Fire Management Policy, 2001). In 2003 the Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy was approved. The 2003 Implementation Strategy was replaced in 2009 with the adoption of the Guidance for Implementation of Federal Wildland Fire Management Policy which states that:

“Fire, as a critical natural process, will be integrated into land and resource management plans and activities on a landscape scale, and across agency boundaries.”

It also states that wildland fire . . . “would be used to protect, maintain, and enhance resources and, as nearly as possible, be allowed to function in its natural ecological role as a disturbance factor in the ecosystem.” (USDA and USDOJ 2009)

The 2009 Guidance for Implementation of Federal Wildland Fire Management Policy (USDA and USDOJ 2009) provides the terminology related to fire used in this report. ‘Wildland fire’ is a general term describing any non-structural wildland fires, categorized in two distinct types:

- **Wildfire.** Wildfires are unplanned ignitions, including escaped prescribed fires that are declared wildfires. Wildfires may be ignited by natural causes, namely lightning, or human caused (NWCG 2009). Wildfires may be managed for suppression, resource objectives, or any combination of these, but they all are unplanned ignitions.
- **Prescribed fire.** Planned ignitions are fires initiated by the intentional initiation of a wildland fire by hand-held, mechanical or aerial device where the distance and timing between ignition lines or points and the sequence of igniting them is determined by environmental conditions (weather, fuel, topography), firing technique, and other factors which influence fire behavior and fire effects (NWCG 2009). “Prescribed fire” includes pile burning, jackpot burning, broadcast burns or other wildland fires originating from planned ignitions to meet specific objectives identified in a written, approved, burn plan for which NEPA requirements (where applicable) have been met prior to ignition (NWCG 2009, FSM 5100).

Federal Land Assistance, Management and Enhancement (FLAME) Act of 2009

The challenge—and the potential—for wildland fire management in the 21st century is perhaps best described by the vision statement adopted by the Wildland Fire Leadership Council (WFLC):

“To safely and effectively extinguish fire, when needed; use fire where allowable; manage our natural resources; and as a Nation, live with wildland fire.”

This vision frames the National Cohesive Wildland Fire Management Strategy effort (Cohesive Strategy) initiated by the Federal Land Assistance, Management and Enhancement (FLAME) Act of 2009. The Cohesive Strategy takes a holistic approach to the future of wildland fire management, and identifies three primary, national goals:

- Restore and Maintain Landscapes, making them resilient to fire-related disturbances.
- Create Fire-adapted Communities.
- Ensure safe, effective, and efficient Wildfire Response.

The Four-Forest Restoration Initiative (4FRI) is not intended to dictate any response to wildfires. However, the implementation of an action alternative would increase the decision space for Agency Administrators making decisions on how to manage wildfire, while reducing the potential for undesirable fire behavior and effects. The effects of planned ignitions (including pile burning, jackpot burning, and broadcast burning) are discussed. This document provides direction, consistent with the Land Management Plans of the Apache-Sitgreaves, Coconino and Tonto National Forests regarding the use of planned ignitions in the areas proposed for treatment.

This report discusses potential effects of unplanned ignitions, but is not intended to provide any direction regarding the management of unplanned ignitions. This document is intended to provide direction, consistent with the Land Management Plans of both the Apache-Sitgreaves, Coconino and Tonto regarding the use of planned ignitions (prescribed fire) in the treatment area.

Agency Level Direction (USDA Forest Service)

USDA Forest Service Strategic Plan: FY 2015 – 2020. Direction in this document specifies the need to restore fire adapted ecosystems, while working with a range of partners. The priority stated is to *“reduce the risk from wildfire to communities and natural resources...working closely with landowners and other partners we will restore the natural role of fire while helping at-risk communities adapt to wildfire hazards.”* Specifically, forest restoration is listed as a desirable means and strategy to decrease threats from wildfire, along with a goal of restoring degraded and at-risk watersheds.

Forest Service Manual 5100 (page 9) includes direction on USFS use of prescribed fire to meet land and resource management goals and objectives. The objectives of fire management on lands managed by the USFS are:

1. Forest Service fire management activities shall always put human life as the single, overriding priority.
2. Forest Service fire management activities should result in safe, cost-effective fire management programs that protect, maintain, and enhance National Forest System lands, adjacent lands, and lands protected by the Forest Service under cooperative agreement.

Land Management Plan Direction

Land Management Plans provide specific goals, objectives, standards, and guidelines for management activities on National Forest lands. The Apache/Sitgreaves (USDA 2015), Coconino (USDA 2018) and Tonto National Forest (USDA 1985 (2011)) have developed forest-wide and location-specific standards and guidelines for reducing the risk of undesirable fire behavior and effects.

Land Management Plan direction addressing fire behavior, fire effect, air quality, and smoke ecology have been incorporated into this analysis as appropriate. General direction from each forests' Land Management Plan. Specific and specific relevant guidelines from the National Forest Land Management Plans is discussed below.

The Coconino National Forest Land and Resource Management Plan ,the Apache-Sitgreaves National Forest Land Management Plan, the Tonto National Forest Land Management Plan, and the Tonto National Forest Draft Land and Resource Management Plan all allow for the

management of wildfires for resource benefits when and where expected fire effects and behavior would be beneficial and would not threaten lives, property, infrastructure or critical resources.

Apache-Sitgreaves National Forest (ASN)

The ASN Land Management Plan has a specific focus on the role of healthy ecosystems and on ecosystem diversity, particularly the distribution, complexity, and natural disturbance regimes (including fire) of watershed and landscape scale features, affecting terrestrial, aquatic, and riparian ecosystems. The ASN Land Management Plan recognizes that ecological desired conditions may only be achievable over a long timeframe (several hundred years). A recurring theme through all management direction is for management actions reduce the negative effects of uncharacteristic fire effects and to restore wildfire to a more natural function.

Overall Ecosystem Health

Desired Conditions

Ecological components (e.g., soil, vegetation, water) are resilient to disturbances including human activities and natural ecological disturbances (e.g., fire, drought, wind, insects, disease, and pathogens).

Natural ecological disturbances return to their characteristic roles within the ecosystem. Wildfire, in particular, is restored to a more natural function

All Potential Natural Vegetation Types

Desired Conditions on a landscape scale (>1,000 acres) and at the mid-scale (100 – 1,000 acres), Guidelines, and Objectives:

Vegetative conditions are expected to be resilient to natural disturbances that are a part of the ecology of the area, including variations in climate. Specific to this report, “Natural fire regimes are restored and uncharacteristic fire behavior is minimal or absent on the landscape. Fire maintains and enhances resources and, as nearly as possible, is allowed to function in its natural ecological role.”

Management Approach

Vegetation treatments are concentrated in priority 6th level HUC watersheds and areas identified in community wildfire protection plans, including regular treatments to maintain desired conditions in the Community-Forest Intermix Management Area terrestrial ecosystem survey.

Community-Forest Intermix Background for Community-Forest Intermix

The Community-Forest Intermix Management Area consists of National Forest System (NFS) lands that are within one-half mile of communities-at-risk. Due to the threat of fire moving into or from developed areas, more intensive treatments (including regular maintenance) may be needed to reduce the risk of uncharacteristic wildfire and restore fire-adapted ecosystems. This management area may act as a zone in which fire suppression activities can be safely and effectively conducted. Likewise, it can act as a buffer to protect forest resources. The Community-Forest Intermix Management Area makes up a portion of the wildland-urban interface (WUI). The WUIs were identified in community wildfire protection plans (CWPPs) and may be located in several management areas. A WUI includes areas around human development at imminent risk from wildfire. Chapter 3. Management Area Direction Apache-Sitgreaves National Forests Land Management Plan 113

Desired Conditions for Community-Forest Intermix

- The Community-Forest Intermix Management Area is composed of smaller groups of trees that are more widely spaced than other forested areas. These conditions result in fires that burn primarily on the forest floor and rarely spread as crown fire.

As a result of forest management, most wildfires are low to mixed severity surface fires resulting in limited loss of structures or ecosystem function.

- These areas provide a safer firefighting environment than the general forest.
- Native grasses, forbs, shrubs, and litter (i.e., fine fuels) are abundant enough to maintain and support natural fire regimes, protect soils, and support water infiltration.
- The composition, density, structure, and mosaic of vegetative conditions reduce uncharacteristic wildfire hazard to local communities and forest ecosystems.
- Ponderosa pine and dry mixed conifer forest structure is similar to forest-wide conditions or is composed of smaller and more widely spaced tree groups than in the general forest.
- Wet mixed conifer and spruce-fir forests are growing in an overall more open condition than the wet mixed conifer forest outside of the Community-Forest Intermix Management Area. These conditions result in fires that burn primarily on the forest floor and rarely spread as crown fire.
- Where potential occurs, pure deciduous stands (e.g., aspen, Gambel oak) act as natural firebreaks and enhance scenery.
- Grasslands have less than 10 percent woody canopy cover.
- Piñon-juniper stands have open canopy conditions.
- The integrity of riparian areas is maintained.

Management Approaches

Treatments may occur more often than in other management areas. Both mechanized methods and prescribed fire may be used regularly. A higher degree of temporary ground disturbance may occur. The amount of snags and residual large coarse woody debris is generally lower than in the General Forest Management Area. In addition, forest openings are larger and basal areas are lower than in the General Forest Management Area. The management approach within this management area is to complete initial treatments to reduce fire hazard. Once initial treatments are complete, the focus is to maintain the investment and desired conditions primarily through prescribed fire and mechanical treatments. Other objectives may also be considered. Best available control technologies are used to limit smoke impacts from forest management activities. Forest managers coordinate with adjacent land management agencies and tribes to help reduce the impacts of prescribed fire programs on nearby communities. The forests work closely with adjacent landowners and communities, particularly their planning and zoning departments, to encourage new and existing developments to take into account measures to protect people, property, and natural resources from wildfire.

Fire Management

The Apache-Sitgreaves NFs' FMP provides for firefighter and public safety first; includes fire management strategies, tactics, and alternatives; and addresses values to be protected and public health issues. The FMP helps guide fire managers in wildland fire decision making. When appropriate weather and fuel moisture conditions exist, use of wildland fire is a cost-effective way to reduce the likelihood of uncharacteristic fire. The risk of uncharacteristic fire can be reduced when fires occur within historic fire regimes. To achieve ecosystems that are resilient to fire disturbance, vegetation structure needs to be more consistent with desired conditions. In addition to fire treatments, activities such as thinning and tree harvesting are needed to reduce tree density and canopy cover and support the natural fire regime. Strategic placement and design of these treatments is key to minimizing the impact from fire on values to be protected more efficiently because these activities are costly and there is limited capacity to implement them.

Desired Conditions

- Human life, property, and natural and cultural resource are protected within and adjacent to NFS lands.
- Wildland fires burn within the range of frequency and intensity of natural fire regimes. Uncharacteristic high severity fires rarely occur and do not burn at the landscape scale.
- Wildland fire maintains and enhances resources and functions in its natural ecological role.
- For all PNVTs, the composition, cover, structure, and mosaic of vegetative conditions reduce uncharacteristic wildfire hazard to local communities and forest ecosystems.

Management Approaches

To meet the plan's treatment objectives using prescribed fires, site-specific burn plans are developed which guide implementation. All prescribed fires are conducted in accordance with the Arizona Smoke Management Plan, administered by ADEQ, to comply with the Clean Air Act. Wildland fire is one tool in the process of restoring the forests' fire-adapted ecosystems; in areas departed from desired conditions, the use of fire is often most effective when combined with mechanical treatments that further restore forest structure³⁴. Mechanical treatments are costly, so the capacity to implement such treatments across the landscape is limited. Strategic placement and design of mechanical treatments increases their effectiveness in protecting values to be protected. Wildland fire may be the only viable tool in areas such as steep rugged terrain or remote areas where mechanical treatments are not feasible. Objectives in these areas may include higher fire intensities and higher levels of mortality to achieve vegetation structural changes that would not occur through other means to move toward desired conditions. Fuels specialists and silviculturists, along with other resource specialists, work to ensure land management objectives are met. Joint silviculture prescriptions and burn plans may be produced.

Coconino National Forest (COF)

This plan does not include site-specific project and activity decisions, but provides guidance and direction for projects, including the Rim Country analysis. The COF Land Management Plan is a framework for sustaining native ecological systems and guides management toward appropriate conditions that support native plant and animal diversity. The plan integrates forest restoration; watershed protection; resilience to changing climate; wildlife conservation; and social and

economic values, goods, and services. The plan honors the continuing validity of private, statutory, or pre-existing rights.

All Ecosystems

Desired Conditions

As with most revised Land Management Plans in Region 3, this LRMP provides direction to restore and/or maintain the natural fire regimes across the forest whenever practicable and appropriate.

It is important to recognize that the goal is that most acres would be managed towards the median of the range, but representation across the range is equally desired. However, it may be appropriate to have different desired conditions within a vegetation type, such as a lower density of vegetation in the WUI than outside of the WUI to achieve the desired fire behavior near property and human occupancy.

Management Approaches

Fire is essential for ecosystem function and for maintaining or moving toward desired conditions in ecosystems where fire is the primary natural disturbance. Primary natural disturbances in Desert Communities, Alpine Tundra, and riparian areas do not include fire, but rather include flooding, precipitation, temperature, wind, avalanches, and ultraviolet radiation. When used as a tool, fire can effectively restore forest structure when used alone or when combined with mechanical treatments. Mechanical treatments may be costly, so the capacity to implement such treatments across the landscape may be limited. Strategic placement and design of mechanical treatments increases their effectiveness in protecting values at risk.

In areas of high vulnerability to climate change, consider the following approaches to facilitate natural adaptation to changing conditions. Because many early-mid species or species characteristic of lower life zones are adapted for warmer and drier conditions, emphasize early-mid seral species or species from lower life zones over late-seral species and species of higher life zones. Consider managing tree basal area at the low end of the range of desired conditions to mitigate water stress.

Foster partnerships with the Rocky Mountain Research Station and other science organizations to identify and develop concepts, tools, and research opportunities applicable to ecosystem restoration and vegetation management on the Coconino NF.

Work with volunteer groups on projects that improve vegetation and ecosystem function. Consider inclusions, landscape variability, and transition zones during project planning to support biodiversity at the fine and mid scales. Inclusions and variability could include individual species, such as alligator juniper or blue spruce, or microclimates, such as cool, moist sites in a more arid environment, or warm, dry sites surrounded by more arid conditions.

Wildland Urban Interface

In an effort to identify and protect community infrastructure, the Healthy Forest Restoration Act (2003) called for preparation of community wildfire protection plans to define the wildland-urban interface and establish priorities for wildfire preparedness and hazardous fuels reduction work in these areas. Currently, the Coconino NF has two community wildfire protection plans that cover over 1,494,900 acres on Federal, State, county, and private lands. Of this, approximately 1,304,152 acres are on NFS lands. These two community wildfire protection plans are for Flagstaff and surrounding communities (GFFP and PFAC 2005) and Blue Ridge Area and

Mogollon Ranger District of the Coconino NF (Gatewood and Hampton 2009).

There are additional areas on the forest that meet the Forest Service Manual (Southwestern Region supplement) definition of wildland-urban interface (Region 3 supplement 5140). For the plan revision, wildland-urban interface is defined as follows:

Wildland-urban interface (WUI) includes those areas of resident populations at imminent risk from wildfire, and human developments having special significance. These areas may include critical communication sites, municipal watersheds, high voltage transmission lines, church camps, scout camps, research facilities, and other structures that, if destroyed by fire, would result in hardship to communities. These areas encompass not only the sites themselves, but also the continuous slopes and fuels that lead directly to the sites, regardless of the distance involved. (FSM 5140.5)

During the last 10 years on the Coconino NF, the overall threats to community have decreased with notable increases and decreases in localized areas. Areas that have experienced effective treatments (they have greatly reduced departure and increased fire resilience) in intensive wildland-urban interface tend to have relatively low threat levels. Examples of this include areas adjacent to Flagstaff and Mountainaire. However, areas that have not had effective treatments remain at relatively high threat levels. Of particular concern are those areas that (1) have not received treatment and (2) are on the intensive end of the wildland-urban interface spectrum.

Desired Conditions

FW-WUI-DC

1. Firefighters are able to safely and efficiently suppress wildfires in the WUI.
2. Human life and property are protected. There is reduced fire hazard, intensity, and severity to human health, safety, infrastructure, communication sites, water supply, astronomical sites, and characteristic ecosystem function.
3. In forested ecosystems, WUI conditions result in fires that burn primarily on the forest floor and rarely spread as crown fire. Ladder fuels are nearly absent and crown base heights may also be higher than non-WUI areas to reduce the likelihood of fire reaching the tree canopy.
4. The WUI may have a higher frequency of disturbance from prescribed burning, wildfires managed for resource objectives, and/or vegetative treatments than the natural disturbance regime.
5. Conditions in the WUI, such as live and dead fuel loading, tree basal area, logs, and snags, are on the lower end of the range given in vegetation community desired conditions.
6. In forested vegetation communities, the area occupied by interspace with grass/forb/shrub vegetation is on the upper end of, or above, the range given in the vegetation community desired conditions. Trees within groups may be more widely spaced with less interlocking of the crowns than desirable in adjacent forest lands. Interspaces between tree groups are of sufficient size to discourage isolated group torching from spreading as a crown fire to other groups.
7. Forests in the WUI are dominated by early seral, fire-adapted species growing in a more open condition than the general forest.
8. When WUI intersects ERUs with a mixed- or high-severity fire regime, such as Interior Chaparral, Pinyon Juniper Evergreen Shrub, Pinyon Juniper Woodland, Mixed Conifer

-
- with Infrequent Fire, Spruce-Fir, and some portions of Mixed Conifer with Frequent Fire, characteristic ecosystem function is modified to promote low-severity surface fires.
9. Dead and down fuel load is between 1 and 10 tons per acre, depending on ERU, with lower amounts in frequent fire ERUs, and higher amounts in infrequent fire ERUs such as Mixed Conifer with Infrequent Fire, Spruce-Fir, and portions of Mixed Conifer with Frequent Fire. This light fuel load provides improved fire protection to the WUI, yet still meets desired conditions. This light fuel load applies even in ERUs with higher reference fuel loads, such as Mixed Conifer with Infrequent Fire or Spruce-Fir.
 10. Fuel loading or tree densities at the higher end of the range may occur in areas where it provides for important fine-scale habitat structure or cover, as long as it meets the overall intent of protecting WUI values at risk.

Guidelines for Wildland-urban Interface

FW-WUI-G

1. While still remaining within the range of desired conditions, forest structure in the WUI should have lower tree density and lower levels of snags, logs, and coarse woody debris than non-WUI areas and be arranged spatially to reduce fire hazard and to increase suppression success.

Fire Management

General Description and Background for Fire Management

Wildland fire is any non-structure fire that occurs in vegetation or natural fuels. Wildland fire includes prescribed fires (planned ignitions) and wildfires. Wildfires include either unplanned human-caused fires or naturally caused fires. Wildfires may be concurrently managed for one or more objectives. Objectives are developed based on fuel conditions, current and expected weather, current and expected fire behavior, topography, resource availability, and values at risk. Objectives are also influenced by social understanding and tolerance, and adjoining governmental jurisdictions.

Objectives can change as the fire spreads across the landscape. Parts of a fire may be managed to meet protection objectives, while other parts are managed to maintain or enhance resources (wildfires managed for resource objectives). Site-specific analysis is conducted for prescribed fires and for any wildfire that extends beyond initial attack. For prescribed burns, the decision document is the signed National Environmental Policy Act (NEPA) decision. For wildfires, an analysis is performed using a tool like the Wildland Fire Decision Support System, and signed by the appropriate line officer.

Most of the vegetation on the Forest is adapted to recurrent wildland fires started by lightning from spring and summer thunderstorms. Fire plays a vital role in maintaining ecosystem health. Properly managed prescribed fire and wildfire are tools for maintaining and/or restoring vegetative composition, structure, and function where fire is a primary natural disturbance.

Desired Conditions

FW-Fire-DC

1. Public and firefighter safety is the highest priority in managing fire.
2. Wildland fires burn within the historic fire regime of the vegetation communities affected. High-severity fires occur where this is part of the historical fire regime and do not burn at the landscape scale.
3. Wildland fires do not result in the loss of life, property, or ecosystem function.

-
4. People understand that wildland fire is a necessary natural disturbance process integral to the sustainability of the ecosystems in which fire is the primary disturbance.

Guidelines

FW-Fire-G

1. WUI areas should be a high priority for fuels reduction and maintenance to reduce the fire hazard.
2. Fire management activities should be designed to be consistent with maintaining or moving toward desired conditions for other resources.

Management Approaches

Manage wildland fires forest wide for multiple resource management objectives where conditions permit.

Integrate fire with other management tools to treat and restore vegetative composition, structure, and function in ecosystems where fire is a primary natural disturbance.

In all ROS classes and in wilderness, prescribed fire and wildfires managed for resource objectives can be appropriate tools to treat and restore vegetative composition, structure, and function where fire is a primary natural disturbance.

Coordinate with other jurisdictions such as communities, service providers (infrastructure), and Federal, State, county, and local entities regarding prevention, preparedness, planned activities, and responses to wildland fires. Notify the above regarding the upcoming and ongoing fire season and any prescribed fire activity.

Coordinate access for initial attack and suppression activities with responsible jurisdictions to reduce response times and address public and firefighter safety.

Encourage the development and implementation of community wildfire protection plans to promote public safety and to reduce the risk of wildfire on lands of other ownership.

Coordinate with stakeholders to increase public understanding of the necessity of wildland fire as a process integral to the sustainability of the vegetation communities in which fire is a primary natural disturbance.

Tonto National Forest (TNF) Land Management Plan Amendment

The TNF Land Management Plan was written in 1985, and was most recently amended in 2011. Land Management Plan revision is underway, but is unlikely to be completed before the Rim Country analysis has been completed. For that reason, three amendment exceptions to the Land Management Plan would be required on the Tonto NF to implement the management actions that would meet Rim Country goals and objectives.

Land Management Plan Direction

Forest-wide

Standards and Guidelines

Within the forest-wide intent of improving ecosystem conditions while integrating as much as possible with concerns about hazardous fuel loading, there are few specifics on the type of mechanical activity that is allowed, and it can be combined with prescribed fire in all areas within

the Rim Country analysis.

Fire Standards

The long-term goal of fire management is to re-introduce fire back into fire dependent ecosystems, and allow it to resume its natural role. Fire will be recognized as a resource management tool and will be included within a management prescription where it can effectively accomplish resource management objectives. The priorities for managing wildland fire will be the protection of public and firefighter safety, property, natural and cultural resources to minimize negative impacts (p. 28 of 329, pdf numbering).

Fire management, including suppression activities, will be commensurate with resource values and objectives. The criteria for determining and managing Wildland and Prescribed Fires must meet agency direction.

In areas where it is not possible to allow fire to fully resume its natural role within an ecosystem, Prescribed Fire will be applied to meet management objectives (p. 38 of 329,).

Wildland Fires in the Interface pose an immediate threat to life, property, and adjacent resources. Actively participate with all interested and potentially affected parties to develop strategic Interface management measures to reduce Wildland Fire threats to life, property and resources, address issues of Forest health, and provide for community partnerships including treatments of vegetation and fuels, and access needs. Wildland Fires threatening the Wildland/Urban Interface will have high suppression priority (p. 28 of 329,).

Mexican Spotted Owl Protected Activity Centers, and Steep Slopes in mixed conifer and pine-oak forests outside PACs with slopes greater than 40% that have not been logged within the past 20 years

Standards and guidelines

Use low severity prescribed fire in PACs as determined to be beneficial.

The current Land Management Plan prohibits prescribed fire in the nest core, necessitating Land Management Plan amendment to allow treatments to be proposed that would meet the intent of Rim Country as well as the MSO recovery plan.

Mixed conifer and pine-oak forests MSO habitat

Standards and Guidelines

Encourage prescribed and prescribed natural fire to reduce hazardous fuel accumulation. Thinning is allowed as needed within diameter restrictions specified.

Other Forest and Woodland Types (MSO habitat)

Guidelines

Apply ecosystem approaches to manage for landscape diversity mimicking natural disturbance patterns, incorporating natural variation in stand conditions and retaining special features such as snags and large trees, utilizing appropriate fires, and retention of existing old growth in accordance with Land Management Plan old growth standards and guidelines.

Goshawk habitat

Standards and Guidelines

Low severity prescribed fire is allowed, but no crown fire is allowed in PFAs or nest areas. Managing smoke and fire to minimize detrimental effects to the birds and their habitats is the basis for this standard/guideline.

Ponderosa Pine/bunchgrass Ponderosa Pine/Gamble Oak and Ponderosa Pine/Evergreen Oak

Wildland Fire will be managed consistent with resource objectives. Wildland Fire not meeting management objectives will receive an appropriate suppression response. Fire management objectives for this area include: providing a mosaic of age classes within the total type which will provide for a mix of successional stages, and to allow fire to resume its natural ecological role within ecosystems. Wildland Fires or portions of fires will be suppressed when they adversely affect forest resources, endanger public safety, or have a potential to damage significant capital investments.

Old Growth

In allocating old growth and making decisions about old growth management, use appropriate information about the relative risks to sustaining old growth function at the appropriate scales, due to natural and human-caused events.

All riparian areas

Standards and Guidelines

Prescribed fire may only be used to achieve the objectives of allowing fires to play their natural ecological roles and to reduce unnatural fuel hazards.

Use prescribed fire to treat vegetation for water yield, forage, and wildlife habitat improvement.

Chaparral

Standards and Guidelines

Manage the chaparral type on a 30-year prescribed fire rotation on those sites managed for forage production and water yield and as needed to enhance natural regeneration. Fire may also be used to reduce fire hazard. Activity fuels and natural fuels will be reduced to manageable levels. Fuels management may include fuelwood harvest, chipping, piling, and/or prescribed broadcast burning.

Use prescribed fire for seedbed preparation to enhance natural regeneration and control of competing species such as juniper.

Issues/Indicators/Analysis Topics

The objective of the Four-Forest Restoration Initiative is to restore healthy ecological processes by manipulating the pattern, structure, and composition of ecosystem elements to improve ecological functions across the project area. Fire is a keystone process in healthy ponderosa pine ecosystems as well as grasslands, aspen, and other ecosystems within the analysis area. The following questions were used to guide this analysis regarding the effectiveness of each alternative for moving the analysis area towards the desired condition.

Question 1 - Would/how would proposed management actions move the project area towards the desired condition of having resilient forests and grasslands by reducing the potential for undesirable fire behavior and effects?

This addresses Issues 1: treatment effects in Mexican Spotted owl Protected Activity Centers and Issue 2: treatments in Goshawk habitat. Metrics used to evaluate differences between alternatives include:

Type of fire (surface or crown). Acres and percent area (quantitative measure) of each potential fire type following proposed treatments (details on pg. 27).

Fire Hazard Index is an indicator of the potential for negative fire effects and behavior, including fire intensity (suppression difficulty), fire severity (effects to vegetation), burn severity (soil effects), and second order fire effects (such as erosion). Details are on page 28.

Surface fuel loading (quantitative measure) for this analysis, includes all woody debris (>3" diameter = Coarse; <3" diameter = Fine), combined with litter and duff. These data were used to qualitatively evaluate potential fire effects (details on pg 29).

Assumptions and Methodology

In the analysis of this resource the following assumptions were made:

All mechanical treatments were modeled to have occurred in 2019, and all areas proposed for burning were modeled to have burned in 2024 and again in 2034. In reality, treatments would be spread out over 20 years of implementation, however, the modeled treatment times allow for a direct comparison of alternatives following full implementation of proposed management for each alternative. The specific timing of mechanical treatments would depend on the contract/contractor, road conditions, and numerous factors that are impossible to predict years in advance. Prescribed fire implementation depends on weather conditions, fuel conditions, other fires in the area, available resources, and multiple other variables that are impossible to predict weeks in advance. During the implementation period, untreated areas would be vulnerable to the effects as described in the Existing Condition and/or the Alternative 1 (no action), depending on the applicable time period. Modeling results presented do not include partial treatment, such as would be the case partway through implementation. Details on the treatments modeled can be found in the Silvicultural report (Moore 2019, this DEIS).

The prioritization of treatment areas will be a part of the implementation of Rim Country, though broad recommended methodology is presented here. Results were analyzed to compare the effectiveness of each action Alternative Against the "No-Action" Alternative (Alternative 1). Concepts that are necessary for a thorough understanding of this analysis are discussed when they are first presented. Additional information on modeling and concepts may be found in Appendix B and Appendix C respectively.

The discussion of effects is based on that all BMPs, design features, and mitigations described in Appendix C (page **Error! Bookmark not defined.**) are applied during implementation. Effects discussions are based on modeled fire behavior, modeled emissions, and proposed treatments for which the methods and assumptions are detailed in this section and appendices below and in the Silviculture Specialists' Report (Moore, this report).

Scales of analysis

The alternatives in this analysis are evaluated at multiple scales to ensure the expected effects are being considered in the appropriate context.

1. In order of decreasing size, with the largest first:
 - a. **Rim Country Project Area:** This includes the entire area analyzed for treatment, including comprehensive restoration, at 1,240,000 acres. It includes large areas on which the Rim Country analysis is not recommending treatments. (Figure 1)
 - b. **Hydrologic Unit Code (HUC):** Proposed treatments will be analyzed and evaluated at the 6th level HUC. In order to be included in this report, at least 30% of the watershed had to be within the Rim Country Project Area, resulting in 79 watersheds being analyzed. The watersheds range in size from 7,176 acres to 39,135 acres, with a mean size of 18,494 acres. (Figure 2, Table 1)

Table 1: HUC 6 watersheds with at least 30% of the watershed within the Rim Country Project Area

| Map Label | HUC ID | Watershed Name | Watershed Total Acres | USFS Acres in Rim Country Project Area | % of watershed in project area |
|-----------|--------------|--|-----------------------|--|--------------------------------|
| 1 | 150200050202 | Upper Brown Creek | 11,074 | 6,467 | 23% |
| 3 | 150200050308 | Mortensen Wash | 19,406 | 17,638 | 12% |
| 4 | 150200080304 | Barbershop Canyon | 13,408 | 13,323 | 56% |
| 5 | 150200080307 | Leonard Canyon | 29,521 | 28,377 | 49% |
| 6 | 150601030305 | Gentry Canyon | 7,820 | 4,949 | 50% |
| 7 | 150601030801 | Reynolds Creek | 10,046 | 8,247 | 68% |
| 8 | 150602020603 | Double Cabin Park-Jacks Canyon | 21,654 | 18,136 | 13% |
| 9 | 150602030202 | East Verde River Headwaters | 18,809 | 18,147 | 30% |
| 10 | 150602030203 | Webber Creek | 22,480 | 16,714 | 40% |
| 11 | 150200020403 | Sepulveda Creek | 11,404 | 4,974 | 24% |
| 12 | 150200080308 | Cabin Draw | 14,256 | 14,172 | 35% |
| 13 | 150200100104 | Upper Chevelon Canyon-Chevelon Canyon Lake | 17,062 | 15,327 | 34% |
| 14 | 150200100203 | Bear Canyon-Black Canyon | 16,896 | 15,572 | 19% |
| 15 | 150601030301 | Bull Flat Canyon | 14,357 | 4,988 | 6% |
| 16 | 150602020610 | Red Tank Draw | 36,113 | 11,387 | 22% |
| 17 | 150602030101 | Upper Willow Valley | 22,824 | 22,582 | 11% |
| 18 | 150602030106 | Home Tank Draw | 22,880 | 14,918 | 37% |
| 19 | 150602030206 | Pine Creek | 30,691 | 14,319 | 46% |
| 20 | 150200050106 | Linden Draw | 12,242 | 4,875 | 16% |

| Map Label | HUC ID | Watershed Name | Watershed Total Acres | USFS Acres in Rim Country Project Area | % of watershed in project area |
|-----------|--------------|---|-----------------------|--|--------------------------------|
| 21 | 150200050302 | West Fork Cottonwood Wash-Cottonwood Wash | 18,780 | 18,007 | 6% |
| 22 | 150200050303 | Upper Day Wash | 12,169 | 10,742 | 7% |
| 23 | 150200080306 | Upper Willow Creek | 18,582 | 18,107 | 48% |
| 24 | 150200100105 | Middle Wildcat Canyon | 10,350 | 9,798 | 25% |
| 25 | 150200100109 | Lower Wildcat Canyon | 10,911 | 4,087 | 43% |
| 26 | 150200100301 | Upper Potato Wash | 12,956 | 10,775 | 40% |
| 27 | 150601050203 | Christopher Creek | 18,805 | 17,505 | 46% |
| 28 | 150602030105 | Lower Willow Valley | 30,865 | 29,777 | 12% |
| 29 | 150602030107 | Upper West Clear Creek | 14,446 | 10,730 | 45% |
| 30 | 150602030306 | Hardscrabble Creek | 25,220 | 9,758 | 33% |
| 31 | 150200050101 | Billy Creek | 17,813 | 354 | 16% |
| 32 | 150200050309 | Dodson Wash | 21,403 | 7,565 | 32% |
| 33 | 150200100102 | Long Tom Canyon-Chevelon Canyon | 21,224 | 12,191 | 43% |
| 34 | 150200100107 | Upper West Chevelon Canyon | 16,731 | 16,272 | 39% |
| 35 | 150601030401 | Parallel Canyon-Cherry Creek | 14,640 | 13,837 | 33% |
| 36 | 150601050102 | Rock Creek | 16,312 | 7,333 | 22% |
| 37 | 150602030104 | Clover Creek | 9,924 | 4,659 | 52% |
| 38 | 150602030201 | Ellison Creek | 27,120 | 23,900 | 24% |
| 39 | 150200050103 | Fools Hollow | 7,176 | 298 | 30% |
| 40 | 150200080301 | Miller Canyon | 10,668 | 7 | 7% |
| 41 | 150200080303 | East Clear Creek-Blue Ridge Reservoir | 20,224 | 558 | 52% |
| 42 | 150200080309 | Wilkins Canyon | 13,406 | 13,321 | 42% |
| 43 | 150200080310 | Lower Willow Creek | 12,373 | 11,760 | 47% |
| 44 | 150200100204 | Upper Pierce Wash | 16,396 | 9,914 | 14% |
| 45 | 150200100205 | Upper Brookbank Canyon | 16,574 | 16,301 | 28% |
| 46 | 150601030404 | Gruwell Canyon-Cherry Creek | 23,994 | 8,464 | 38% |
| 47 | 150601030802 | Workman Creek | 12,877 | 7,341 | 51% |
| 48 | 150601050101 | Buzzard Roost Canyon | 14,016 | 13,880 | 47% |

| Map Label | HUC ID | Watershed Name | Watershed Total Acres | USFS Acres in Rim Country Project Area | % of watershed in project area |
|-----------|--------------|--|-----------------------|--|--------------------------------|
| 49 | 150601050202 | Gordon Canyon | 17,973 | 15,735 | 47% |
| 50 | 150602030305 | Upper Fossil Creek | 25,829 | 11,998 | 32% |
| 51 | 150200080501 | Windmill Draw-Jacks Canyon | 27,293 | 22,586 | 18% |
| 52 | 150200080505 | Hart Tank | 21,637 | 5,858 | 60% |
| 53 | 150200050201 | Ortega Draw | 10,483 | 382 | 16% |
| 54 | 150200100103 | Upper Wildcat Canyon | 25,458 | 9,963 | 36% |
| 55 | 150200100106 | Alder Canyon | 15,598 | 15,534 | 36% |
| 56 | 150200100110 | Durfee Draw-Chevelon Canyon | 22,765 | 13,860 | 68% |
| 57 | 150200100202 | Buckskin Wash | 18,604 | 17,121 | 6% |
| 58 | 150601030803 | Upper Salome Creek | 19,063 | 17,050 | 51% |
| 59 | 150601050103 | Upper Spring Creek | 21,263 | 10,029 | 55% |
| 60 | 150601050204 | Horton Creek-Tonto Creek | 17,254 | 16,976 | 37% |
| 61 | 150602020604 | Brady Canyon | 17,922 | 15,926 | 6% |
| 62 | 150200080502 | Tremaine Lake | 30,804 | 24,960 | 8% |
| 63 | 150200080503 | Dogie Tank-Jacks Canyon | 22,084 | 20,082 | 13% |
| 64 | 150200050107 | Bagnal Draw-Show Low Creek | 17,704 | 6,660 | 5% |
| 65 | 150200050301 | Stinson Wash | 8,013 | 7,055 | 10% |
| 66 | 150200080102 | Upper Phoenix Park Wash | 19,257 | 12,595 | 14% |
| 67 | 150200080302 | Bear Canyon | 14,579 | 90 | 7% |
| 68 | 150200100108 | Lower West Chevelon Canyon | 16,845 | 8,477 | 44% |
| 69 | 150601050206 | Bull Tank Canyon-Tonto Creek | 22,095 | 11,203 | 44% |
| 70 | 150602030103 | Toms Creek | 8,520 | 7,432 | 51% |
| 71 | 150200050102 | Porter Creek | 25,078 | 6,711 | 16% |
| 72 | 150200050104 | Show Low Lake-Show Low Creek | 19,205 | 675 | 23% |
| 73 | 150200080101 | Decker Wash | 20,095 | 7,128 | 12% |
| 74 | 150200080305 | Gentry Canyon | 15,024 | 14,934 | 61% |
| 75 | 150200080311 | East Clear Creek-Clear Creek | 39,135 | 30,326 | 39% |
| 76 | 150200100101 | Woods Canyon and Willow Springs Canyon | 16,685 | 13,424 | 29% |
| 77 | 150200100201 | West Fork Black Canyon | 8,660 | 8,663 | 9% |

| Map Label | HUC ID | Watershed Name | Watershed Total Acres | USFS Acres in Rim Country Project Area | % of watershed in project area |
|-----------|--------------|-------------------------|-----------------------|--|--------------------------------|
| 78 | 150601030302 | Canyon Creek Headwaters | 25,788 | 19,474 | 7% |
| 79 | 150601050205 | Haigler Creek | 33,157 | 24,582 | 52% |
| 80 | 150602030102 | Long Valley Draw | 18,270 | 14,562 | 33% |

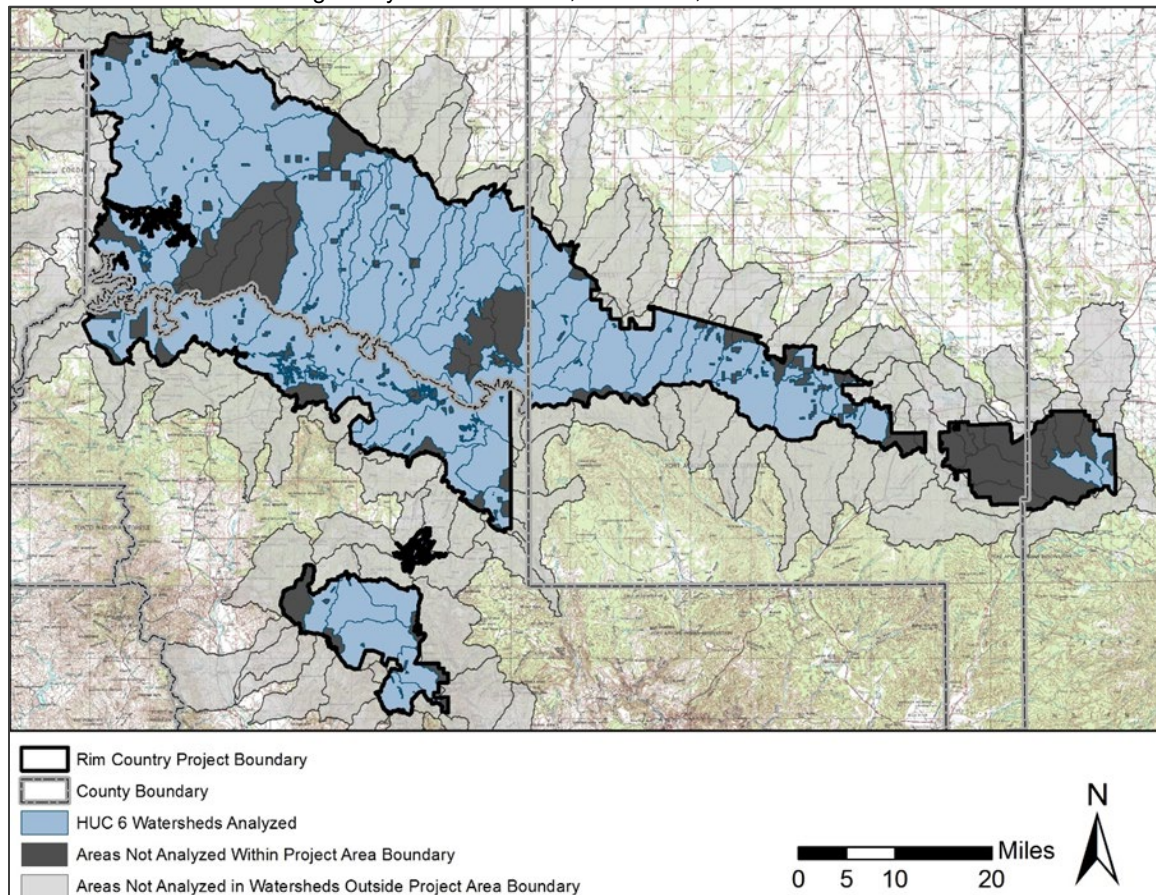


Figure 2. HUC 6 Boundaries - Dark gray areas are areas that are not being analyzed in this report, they represent other project areas, non-forest system lands, and portions of watersheds with less than 30 percent of their area within the project area. Light gray areas are HUC 6 boundaries that fall outside the project area and were not analyzed in this report.

Metrics & Measures

Throughout this analysis, there are references to ‘undesirable fire behavior and effects. Where it is legally and practically possible, ‘desirable’ fire behavior and effects align with reestablishing natural fire regimes, and that is the intent across the majority of the project area. Examples of where it is not possible to restore the natural fire regime include, but are not limited to, the following:

Example 1: Mexican Spotted Owl habitat: Where there are nest cores, in particular, there is a need, legally and biologically, to manage those areas for denser vegetation than would have existed there historically. That means that, in most cases, fire will need to be less frequent than it would have been historically, and there is a desire to prevent high

severity fire in those areas.

Example 2: Proximity to infrastructure for certain vegetation types. Some of the ponderosa pine/evergreen oak and adjacent Chaparral/Madrean cover types historically would have had components of high severity fire as part of their natural fire regimes. Where these cover types occur on steep slopes above vulnerable assets, it may be necessary to manage these areas for lower severity fire.

The metrics used to evaluate the effectiveness of the alternatives in meeting the purpose and need of the project are described in detail below. A comparison of the outputs of these metrics between alternatives is displayed in Table 2.

Table 2: Brief description of the metrics used in this analysis.

| Metric | Application | Issue/s Addressed | Assets and Resources Addressed |
|---|--|--|--|
| Fire Type | Indicates potential fire behavior at all scales analyzed. Crown fire is one an indicator of high severity fire. | Landscape and habitat resilience to wildfires burning under extreme conditions, vulnerability of values | Fire Management, Wildland Urban Interface, Old Growth Trees, Vegetation Cover Type, Watershed Response |
| Fire Hazard Index | See page 28 for details. | Landscape/habitat resilience to wildfires burning under extreme conditions, including both first and second order fire effects, and wildfire suppression difficulty. | Fire Management, Wildland Urban Interface, Vegetation Cover Type, Watershed Response |
| Total Surface fuel loading (Litter + Duff + Fine Woody Debris + Coarse Woody Debris) | Surface fuel loading is used to indicate potential for surface fire severity and intensity, particularly in areas where there may not be crown fire. | Potential for high burn severity and high severity effects from both prescribed fire and wildfire from first and second order fire effects. | Old Growth Trees, Vegetation Cover Type, Watershed Response |

The effects of wildfire as quantified by the metrics and measures have direct implications for a variety of highly valued resources and assets. For this report, the resources and assets analyzed will be:

1. Fire management
2. Wildland Urban Interface
3. Old Growth Trees
4. Vegetation Cover Type

Fire Modeling

The intent of the fire modeling in this analysis is to identify the areas at greatest risk of undesirable fire behavior and first and second order fire effects, and what the expected effects would be for each of the alternatives. The primary fire modeling for this effort includes

conditional fire effects. These outputs represent the likely results if the entire landscape burns under the specified fire weather inputs. Actual wildfires do not naturally burn this way, but rather burn with variance in burn conditions throughout individual burn periods and throughout the fire season. Nevertheless, conditional fire models can be helpful when evaluating relative “problem” areas on the broader landscape and help highlight overall changes in conditions between alternatives when subjected to extreme fire weather conditions have led to large problem fires in and adjacent to the project area.

One of the objectives of the Rim Country EIS is to reduce the likelihood of uncharacteristic wildfires, including large, high severity fires. Modeling fire behavior using conditions under which an uncharacteristic fire is known to have occurred allows for increased accuracy of post-treatment modeling results (McHugh, 2006). This analysis used the Rodeo/Chediski (RC) Fire, which was a large, complex fire that burned in 2002 on the Tonto and Apache-Sitgreaves National Forests, including about 100,000 acres within the Rim Country project area. The Rodeo fire was human caused, and was started on June 18 about 10 miles northeast of Cibecue on the lower slopes of the Mogollon Rim. The Chediski Fire was also human caused June 20 about 12 miles to the west of the Rodeo Fire. The fires merged and became the Rodeo/Chediski Complex which burned 468,638 acres before it was contained on July 6th. The fire effects were high, with 169,043 acres of high severity fire and 144,944 acres of moderate severity fire, in total accounting for 67% of acres burned. Vegetation within the fire perimeter still hasn’t recovered in many of the areas that burned with moderate to high severity. The fire also burned 426 structures and homes. Over 30,000 people were evacuated from areas are within, adjacent to, or near the Rim Country Project area.

Conditions under which the RC Fire burned were extreme in regards to temperature, humidity, and fuel moisture. These are conditions that are likely to be more common in coming decades (Brown *et al.* 2004; Westerling *et al.* 2006). Modeled fire behavior assumes that every pixel within the dataset use for this modeling burned under the weather conditions recorded at the Heber RAWS at 1400 hours on June 25th, 2002 (Table 3). In a real wildfire, wind speeds and direction are erratic, and wind speeds recorded at a given point are unlikely to be representative of wind speed or direction across the fire area. Additionally, not all wind gusts are captured by weather stations. The maximum wind gust that occurred over the duration of the Rodeo/Chediski Fire was 36 mph. We used 20 mph in order to preserve the contrast in potential fire behavior as well as wind gusts.

Table 3: The weather conditions during the Rodeo/Chediski Fire (June 25th, 2002), and 97th percentile weather conditions from the Heber RAWS.

| Variable | 97th percentile weather | Rodeo-Chediski Observed Weather (percentile) | Inputs used for fire modeling (percentile) |
|-------------------------------|--------------------------------|---|---|
| Maximum Temperature (°F) | 92 | 89 (94 th) | 89 (94 th) |
| Minimum RH (%) | 6 | 3 (99 th) | 8 (95 th) |
| Maximum 20' steady wind (mph) | 16 | 4 (<50 th) | 20 |
| Maximum wind gust (mph) | 29 | 6 (<50 th) 36 (>99 th) | n/a |
| 1 hr fuel moisture (%) | 1 | n/a | 3 (85 th) |
| 10 hr fuel moisture (%) | 2 | n/a | 3 (90 th) |
| 100 hr fuel moisture | 4 | n/a | 5 (95 th) |

| Variable | 97th percentile weather | Rodeo-Chediski Observed Weather (percentile) | Inputs used for fire modeling (percentile) |
|----------|-------------------------|--|--|
| (%) | | | |

Data for modeling fire behavior is based on a landscape spatial information which describes the fuel and topographic characteristics of an area, at a 30x30 meter (0.22 acre) resolution. The landscape file was created using a combination of Landfire 2014 data (LF1.4.0), Lidar data (see Appendix B for additional information on LiDAR data processing), USFS stand data (Moore, this report) and satellite imagery (NAIP, USFS Resource Photography). Existing condition fuel models were assigned based on a combination of Landfire Existing Vegetation Type (EVT), canopy cover, canopy height and past disturbance. The predominant Landfire EVT was modified in order to match the FSveg stand vegetation cover type, while non-burnable surfaces and riparian corridors were left unmodified regardless of stand vegetation cover type. Lidar data was used to create canopy cover and canopy height rasters. Mapped disturbances including mechanical treatments, prescribed fire and wildfire from 2008 – 2019 were used to further modify fuel model assignments. See Appendix B for more detailed information on LCP creation.

Fire behavior for alternative future conditions used outputs from the Forest Vegetation Simulator Fire and Fuels Extension (Dixon 2003; Rebaun 2016) to adjust data for modeling the effects of actions, or no actions, proposed in the alternatives. Post-treatment landscape files were modified from the existing conditions using the percent of change to canopy characteristics output from FVS-FFE. The resulting stand characteristics informed the assignment of post-treatment fuel models using the Landfire Total Fuel Change tool (LFTFC v0.160). Details of the process for updating existing conditions and assigning post-treatment fuel models for modeling fire type are included in Appendix B.

Primary fire modeling was preformed using a spatial implementation of the crown fire hazard assessment system NEXUS (version 2.1). Supplemental fire modeling was preformed using the Large Fire Simulator (FSIM) to assess landscape burn probability.

Fire Type

In ponderosa pine and most of its associated vegetative communities, the expected type of fire is a good indicator of the health and resilience of the ecosystem. Crown fire in ponderosa pine is lethal to the tree, therefore the amount and distribution of crown fire activity is an important indicator of the health of a frequent fire forest. Fire types include active crown fire, conditional crown fire, passive crown fire, and surface fire as described below.

- a. **Active Crown fire:** A fire that advances from crown to crown in the tops of trees or shrubs (NWCG 2008). Active crown fires generally produce high severity effects and are considered ‘stand replacing’ because they top-kill, kill and/or consume most of the dominant overstory vegetation. Active crown fire is linked to surface fire, perpetuated by a combination of surface and canopy fuels.
- i. **Conditional Crown Fire:** Conditional crown fire is a type of crown fire that moves through the crowns of trees, but is not linked to surface fire. Crown fire must initiate in an adjacent stand and spread through canopy fuels alone. Conditional crown fires burn in areas where canopy base heights are too high for crown fire to initiate within the stand, but there is sufficient horizontal continuity of canopy fuels to carry a crown fire if initiated. In the fire modeling used, Conditional Crown Fire was combined with

Active Crown Fire.

- b. **Passive Crown Fire:** Individual trees or groups of trees ‘torch’, as fire moves up into the canopy, ignited by the passing front of a surface fire. The fire climbs up ladder fuels (low branches, shrubs, or herbaceous vegetation that can produce flame lengths long enough to allow a fire to ‘climb’ into the crown of a tree) into the crown of a tree, igniting the crown (‘torching’ it), but does not spread very far into adjacent crowns (NWCG 2008).
- c. **Surface Fire:** These are fires that burn in surface fuels only. Such fires consume surface fuels such as litter, duff, dead/down woody fuels, and herbaceous or shrubby fuels that are cured enough to be available fuel. Surface fire can be beneficial or detrimental in ponderosa pine, depending on the fuel loading, and the conditions under which the fire burns.

Passive crown fire is less of a concern than active but, when other variables are close, it is worth considering passive crown fire in the context of both severity and its potential to become active crown fire under worse conditions. Passive crown fire does not produce the same magnitude of negative effects as active crown fire because those areas that are burned with high severity are smaller, discontinuous and, in an ecological context, can help maintain forest structure and spatial patterns across the landscape, or maintain/improve grassland structure.

Fire type was evaluated at the Rim Country project area level and at the 6th level hydrologic unit code (HUC) and in order to facilitate an analysis of specific fire effects in different areas. Watershed impacts from fire increase with the proportion of the watershed burned at high severity (Cannon 2010; Neary 2011). Therefore, fire type is considered at all scales in those areas proposed for thinning and/or prescribed fire.

Fire Hazard Index (FHI)

Five datasets were used to identify areas of high probability for severe fire effects, extreme behavior and a complex fire management environment. These datasets are crown fire potential, fire intensity, heat per unit area, slope, and soils with high erosion potential.

As a general rule, the amount and size of plants top-killed by fire increases with an increase in either the rate of heat energy released (fire intensity) or total amount of heat energy released (heat/unit/area). Estimates of the rate and amount of this heat release are thus important descriptors of fire behavior (Wade 2013).

Fire intensity is directly related to the suppression strategies, with direct attack becoming less effective as intensity increases. This holds true for both forested and non-forested systems. Therefore, while fire type will only be undesirable for forested landscapes, the FHI can be undesirable on any burnable landscape.

Steep slopes (> 30%) not only increase fire behavior, they are also difficult to thin via mechanical treatments. Fire suppression on these slopes is ineffective and presents additional hazards to the fire fighters.

Soils with high erosion potential have a greater chance of initiating a post fire debris flow, especially when found on steep slopes. With vegetation cover gone following a wildfire, these soils are more likely to erode than those with a lower erosion potential.

The FHI classified the landscape as shown in Table 4 below. Further details are included in Appendix B.

FHI was evaluated at the Rim Country project area level and at the 6th level hydrologic unit code (HUC) and in order to facilitate an analysis of specific fire effects in different areas. Resource impacts and fire management responses will change with the proportion of the watershed in high hazard classes. Therefore, FHI is considered at all scales in those areas proposed for thinning and/or prescribed fire.

Table 4. Fire Hazard Index scores used to identify the need for treatment for resources, values and assets

| Rating | Comments |
|---------------|--|
| 1 – very low | Conditions are such that expected fire behavior will have minimal negative impacts to resources and suppression efforts, where needed, are expected to be very effective |
| 2 – low | From a fire perspective, areas where crown fire is expected will not pose a threat to soil stability. Areas of high erosion potential are not expected to burn with active crown fires or high intensity conditions. Use of ground resources for suppression efforts becomes increasingly difficult. |
| 3 – Moderate | Either extreme fire behavior resulting in difficult to control fires, or moderate soil severity. Presence of steep highly erodible soils may coincide with crown fire and higher intensity fires. Control of wildfire by suppression efforts will be difficult. |
| 4 – High | These areas have the highest expected levels of all the fire behavior metrics. Control of wildfire by suppression efforts will be difficult and complex. |
| 5 – Very High | These areas have the highest expected levels of all the fire behavior metrics, as well as steep slopes and highly erodible soils, making them prone to adverse second order effects such as debris flows. Control of wildfire by suppression efforts will be difficult and complex. |

Surface Fuel loadings

In this analysis, total surface fuel loading includes fine dead woody debris (FWD) ≤ 3 inches in diameter (FWD), dead coarse woody debris (CWD) > 3 inches in diameter, litter, and duff. FWD and litter contribute significantly to fire behavior as well as fire effects, while CWD and duff are mostly of interest in regards to fire effects (both direct and indirect). All three Land Management Plans provide specific direction on desired conditions for CWD, but are silent or do not quantify any other components of surface fuel loading. In this analysis, CWD, FWD, litter, and duff were combined as “total surface fuel loading” in tons/acre, which is evaluated both qualitatively and quantitatively regarding potential fire effects. Recommended surface fuel loadings are estimates, based on the best available science and expert opinion (Ottmar 2015) on the interaction of surface fuel loading with fire behavior and fire effects

Fuel loadings were evaluated at the Rim Country project area level and the 6th level hydrologic unit code (HUC) and in order to facilitate an analysis of specific fire effects in different areas. Water, soil and wildlife impacts from wildfire are also related to surface fuel loadings.

Affected Environment and Existing Conditions

Existing and desired conditions are discussed as follows:

1. Background and history of the Rim Country area
2. Summary of fire ecology, current condition, and desired condition across the Rim country project area for each cover type and metric used.
3. Surface fuel loading effects on fire behavior, and fire effects

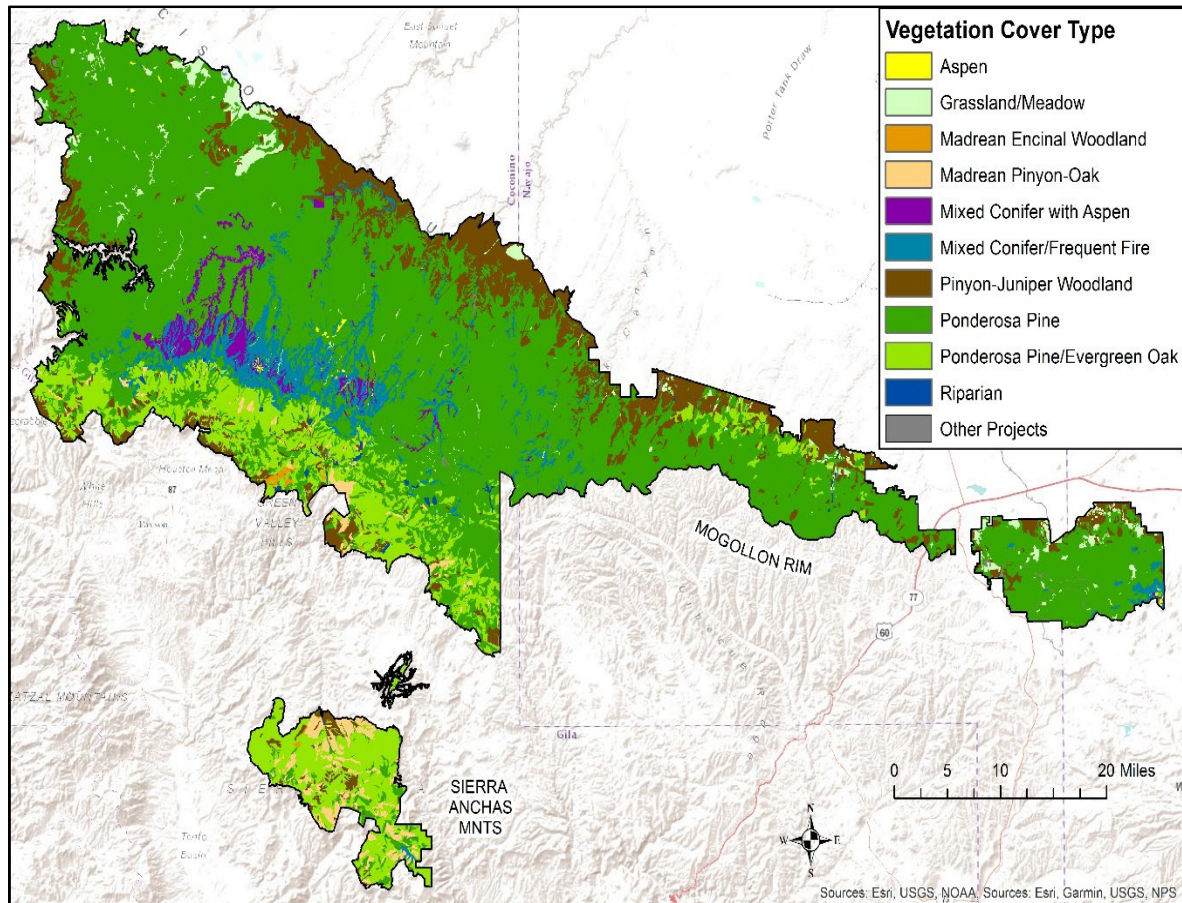


Figure 3: Vegetation Cover Types are based on stand boundaries and correspond to the Ecological Response Units and Potential Natural Vegetation Types described in each Land Management Plan

The Rim Country project area is about 1.24 million acres, encompassing portions of the Apache-Sitgreaves, Coconino, and Tonto National forests. The majority of the Rim Country project is a large, contiguous area along the Mogollon Rim, with a spatially separate area south of the Rim in the Sierra Anchas Mountains (Figure 1).

In regards to fire, the Rim Country landscape is a temporal and spatial mosaic made up of a complex mix of cover types (Figure 3) and fire regime groups (Table 5). The cover types have different fire hazards associated with them throughout the year. The typical climate of the project area includes conditions favorable for frequent early summer fires (Harrington and Sackett 1992), with rainfall minimums occurring in May and June, and some areas averaging less than 0.5 inches during those months. The spring dry season is accompanied by increasing air temperatures, low humidity, and persistent winds, and is broken in early to mid-July with development of almost

daily thunderstorms; July and August are the wettest, warmest months. A second dry season occurs in the fall. While the majority of fires in the project area are in the spring dry season, fires have been reported in all cover types in every month of the year due to inter-annual variability in weather (FOD dataset).

Table 5: Fire regime groups adapted from (Barrett *et al.* 2010)

| Group | Frequency | Severity | Severity Description | Cover types that would be affected by treatments proposed under 4FRI | Acres of FRG within Project Area |
|-------|----------------|----------------------|---|--|----------------------------------|
| I | 0 – 35 years | Low to mixed | Stand replacement is less than 25% of the dominant overstory vegetation. | Most ponderosa pine, dry mixed conifer, savannas | 1,142,310 |
| II | 0 – 35 years | High | High severity replaces greater than 75% of dominant overstory (grasslands). | Grasslands. Grasses and forbs are the dominant species. Greater than 75% of these are likely to be top-killed by fire. | 5,483 |
| III | 35 - 100 years | Mixed to Low | Generally mixed-severity; may also include low severity fires. | Some mixed conifer, chaparral, some pinyon/juniper, Madrean Pinyon/Oak Woodland. | 70,823 |
| IV | 35 - 200 years | High | High severity. | Seral aspen, some wet mixed conifer, some aspen | 12,296 |
| V | 200+ years | High or any severity | Any severity may be included, but mostly replacement severity; may include any severity with this frequency | Some of the Piñon/Juniper, wet mixed conifer, some aspen. | 6,386 |

Background and Historic Conditions

Historically, fire served a critical role in maintaining and sustaining the ecosystems of the Rim Country project area. Prior to euro-american settlement of the region, fires burned frequently and often with low severity across broad areas acting as a driving force in maintaining ecological integrity. However, across the Rim Country landscape, the disruption of Fire Regimes over the last century is largely responsible for the deteriorating health of the ecosystems in Northern Arizona (Covington 1994). In the latter part of the 19th century, unsustainable practices in fire suppression, grazing, and logging began to change the structure and composition of landscapes, making them more homogenized and dense. As a result of the loss of this ecological driver, ecological functions are now impaired across the landscape of northern Arizona (Leopold 1924; Covington 1994; Heinlein *et al.* 2005; Rodman *et al.* 2017).

Fire is a keystone process affecting the ecological functions of functions of fire-adapted forests. As Europeans settled into the area, roads and trails increasingly broke up the continuity of surface fuels and contributed to the reduction of the frequency and size of wildfires (Covington and Moore 1994). Long periods without fire changed the species composition and fuel structure of southwestern ecosystems (Swetnam 1990b; Huffman 2017). There are about 800,000 acres targeted for restoration in Rim Country that historically were maintained by frequent fires.

Logging removed much of the large tree component across the landscape, allowing younger and smaller trees to survive in unnaturally dense stands (Covington and Moore 1994; Swetnam and

Baison 1996).

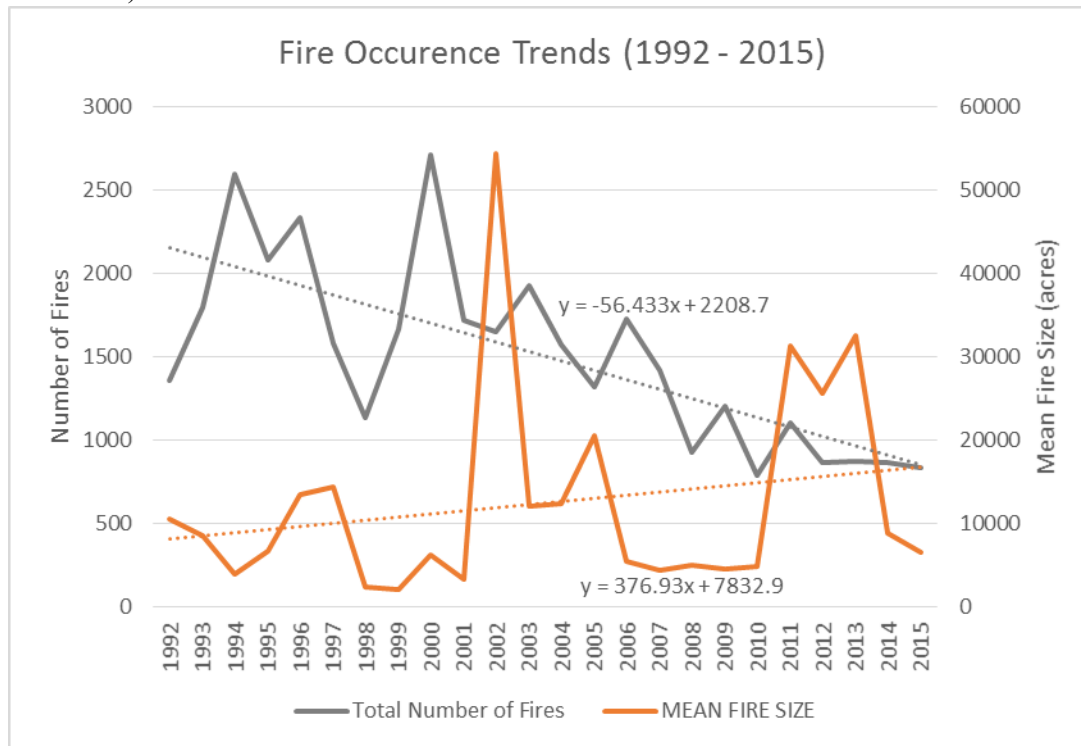


Figure 4: Trends in Mean Fire Size and Total Number of Wildfires from 1992-2015

The disruption of historical fire regimes by introduced ungulates has also been well documented for southwestern ecosystems. Montane grasslands were utilized as summer range for large numbers of sheep and cattle (Leopold 1924). Grazing at such intensities removed much of the fine fuels that had competed with pine seedlings for water, nutrients and light, and had also maintained the light, flashy fuels that produced frequent, cool surface fires, with short residence times. This unintentional fire suppression, initiated in the early 19th century through grazing by sheep and cattle, transitioned in the early 1900s to active fire suppression.

Contemporary Fire Conditions

Fire Occurrence & Fire Regime

There is little doubt that fires, started by lightning or by Native Americans, were frequent before the arrival of the Europeans and in the early years of settlement. Fire scars from stumps collected at various sites in Arizona showed the highest fire frequency average interval of 4.8 years between fires, while the longest average interval between fires exhibited by any sample tree was 11.9 years (Weaver 1951). A 1910 report on what would be the Coconino National Forest stated that over 80% of the yellow pine type (*Pinus ponderosa*) had been burned over one or more times, but that the fires usually destroyed only a small amount of standing timber (Drake 1910). Only two stand replacing fires were noted: the Escudilla fire of July, 1951, which destroyed most of the timber on 19,000 acres and the 21,000 A Dudley Lake fire of June, 1956 (Cooper 1960).

While the historic period for this area was characterized by predominantly low and mixed severity fire that served to sustain and promote ecological integrity, there has been a concerning shift in the contemporary period to large fires with patches of high severity fire effects. This

observed shift in fire trends has led to an increase of what is commonly referred to as “uncharacteristic fire”. Uncharacteristic fire is used in this report to refer to fire that produces a higher percentage of high severity effects than ecologically appropriate in the primary fire adapted ecosystems prevalent in the Rim Country project area. This has been expressed as a shift to higher percentages and larger patches of high severity fire in Ecological Response Units that historically supported predominantly low and mixed severity fire.

The total number of fires reported in and adjacent to the project area has decreased over the last century, while the average size has increased (Figure 4). Some of these fires became large in spite of efforts to suppress them, and some grew large because of management objectives. While fire size is certainly an indicator of the trends in wildfire, it is primarily those areas that burn with uncharacteristically high severity that are of concern.

While the majority of acres burned most years in wildfires continue to be low severity, the total number of acres burning with high severity is much larger than historic data indicates was typical of ponderosa pine in the southwest (Weaver 1951; Covington 1994; Swetnam and Betancourt 1998; Westerling *et al.* 2006). Of the annual acres burned by large fires, about 73% burned at low severity on average, and 27% burned at moderate to high severity. One outlier to this pattern was found in 2002, which is when the Rodeo- Chediski fire burned (see discussion on page 25). While the annual acres burned by large fires has increased since 1992 (Figure 5), the proportion of acres burned in each severity class has remained about the same (Figure 6), with no significant trend found. If these patterns continue into the near future (10 years), the total acres of high severity fire is expected to increase proportional to fire size increases.

Fire itself is not inherently bad, and in the right form is essential to the proper ecological function of the Rim Country landscape. In understanding the ecology of these ecological systems, it is important to differentiate between low-moderate severity fire which can be beneficial and moderate-high severity fire which, in large patches, can be detrimental to ecological integrity.

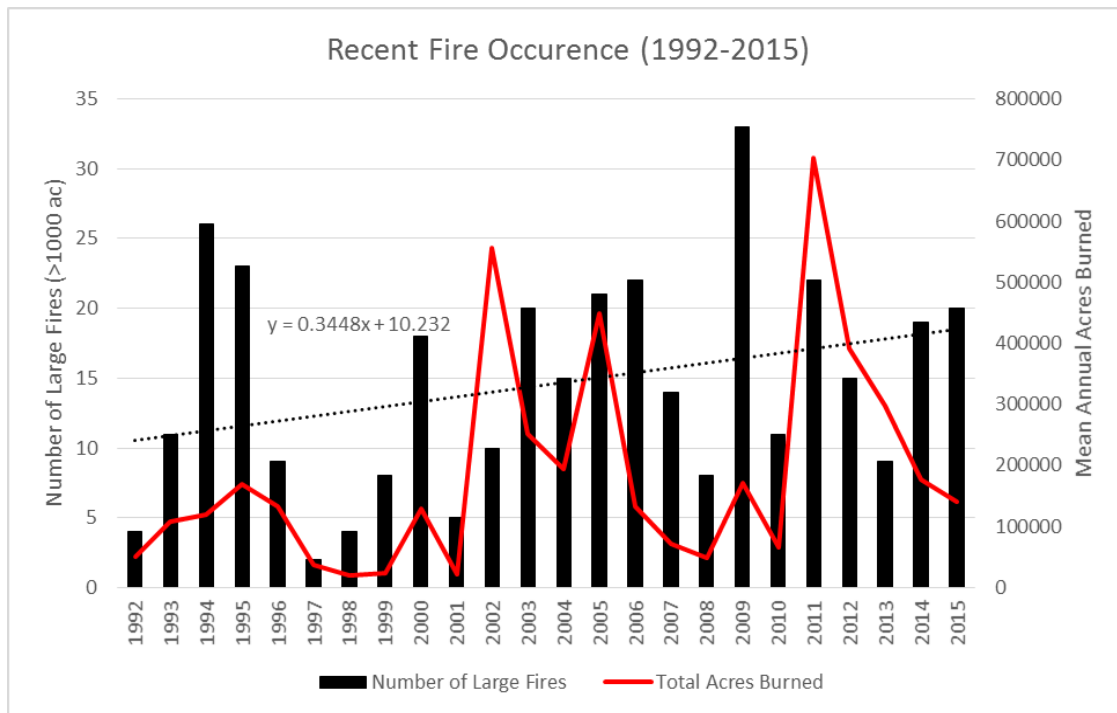


Figure 5: Trends in the Number of Large Fires (>1,000 ac) and Total Acres Burned from 1992 – 2015 within the Arizona/New Mexico Mountains Ecoregion

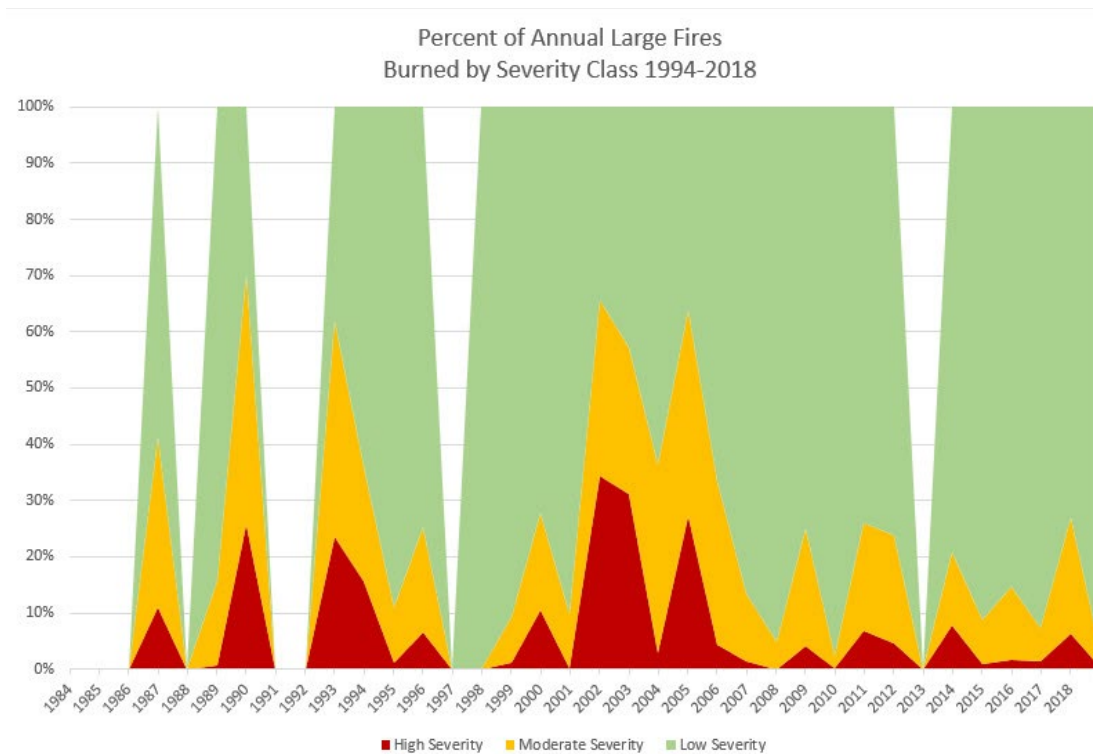


Figure 6: Percent of Annual Large Fires Burned by Severity Class.



Figure 7: Locust dominated area in the Sierra Anchas where the Coon Creek Fire produced high severity effects in 2000.

Areas of high severity fire can have detrimental impacts that extend far from the actual fire perimeter both temporally and spatially. Many of the areas that burned under high severity have been slow to regenerate and remain open with excessive CWD in areas dominated by herbaceous vegetation and/or shrubs. In the Sierra Anchas area of the Tonto National Forest, high severity fires in ponderosa pine has resulted in large areas being dominated by New Mexican Locust (*Robinia neomexicana*) (Figure 7). Where there is high surface fuel loading, high severity fires can consume enough soil organic matter and nutrients that it is difficult for soil-stabilizing plants to take root, leaving the surface soil layers vulnerable to erosion. In addition to the destruction of soil-stabilizing components, hydrophobic soils, and the associated debris flows and floods may have severe, long term effects on areas downstream, downslope, and adjacent to the burned area. These surface layers of soil are essential to natural vegetative communities and, when removed from the site (by erosion), can take hundreds or thousands of years to recover, effectively changing the site potential. See the soils specialist report for more detail.

Current conditions inhibit the survival and recruitment of large trees by fueling increasingly extensive high severity fires. These fires have the potential to alter the successional trajectories of post-burn vegetation, creating entirely different communities than those existing before such events (Savage and Mast 2005; Strom and Fulé 2007b; Kuenzi *et al.* 2008). Figure 8 shows dense forest conditions (numerous trees with dense, contiguous canopy fuels) that occur within the project area and would support high severity fire. Even without crown fire, a surface fire burning through this area could do enough damage to trees to cause widespread mortality (Van Wagner 1973).

Of the 349 large fires (> 1,000 acres), 283 were started by lightning and the remaining 66 were caused by humans (Short 2017). Two of these human caused fires, the Rodeo Chediski (~468,864 acres) fire of 2002 and Wallow (~538,050 acres) of 2011, were some of the most destructive fires in the history of Arizona. The largest lightning ignited fires include the Whitewater Baldy fire (297,845) of 2012, the Humbolt fire (248,310) of 2005 and the Silver fire (234,000) of 2013. These fires mostly burned in ponderosa pine.



Figure 8: Conditions in dry mixed conifer in the project area that could easily support high severity fire.

Fire Return Interval (FRI)

Fire Return Interval (FRI) can be used as a coarse indicator of how departed an area is in regards to the fire regime. The FRI calculated for this analysis does not take into account seasonality, severity, size, spatial complexity, or other important characteristics of a fire regime. However, particularly when combined with cover type/s, and severity, it is a useful indicator for evaluating how far an area has departed from a sustainable fire regime.

Fire Return Interval is a component of the fire history of an area. The Mogollon Rim, and the Sierra Ancha areas have a high density of ignitions, both lightning and human. In the past 31 (1987 – 2017) years, 850,215 acres of the 1,238,658-acre project area burned, for a mean annual acres burned of 27,426 acres. In addition to wildfire, 242,028 acres of Rx fire have occurred in the project area from 1995 – 2018 for another 10,084 acres per year. Prescribed fire is often focused on areas strategic to values at risk, and therefore is concentrated on the landscape, rather than distributed throughout (Figure 9). Taken together, the mean fire return interval for the entire project area is 33 years. While this represents a positive reintroduction of ecologically appropriate fire to the landscape, it still represents less frequent fire than is appropriate for these systems. In order to restore ecological balance in these systems, additional fire is needed across the landscape.

For Montane Ponderosa Pine forest types, the recent FRI is 38 years (Table 6). This is almost double the desired maximum average for maintenance burning in ponderosa pine on the Mogollon Rim. The FRI is 59 years for Ponderosa Pine-Evergreen Oak, 65 years for dry mixed conifer, and 113 for grasslands in the project area. These FRIs represent an average that includes areas that have burned much more frequently and areas that have burned at a much longer frequency. These higher than desired fire return intervals have contributed to the degree of departure from historic conditions that puts over 51% of the area proposed for treatment area at risk of moderate to high severity fire effects based on recent severity proportions.

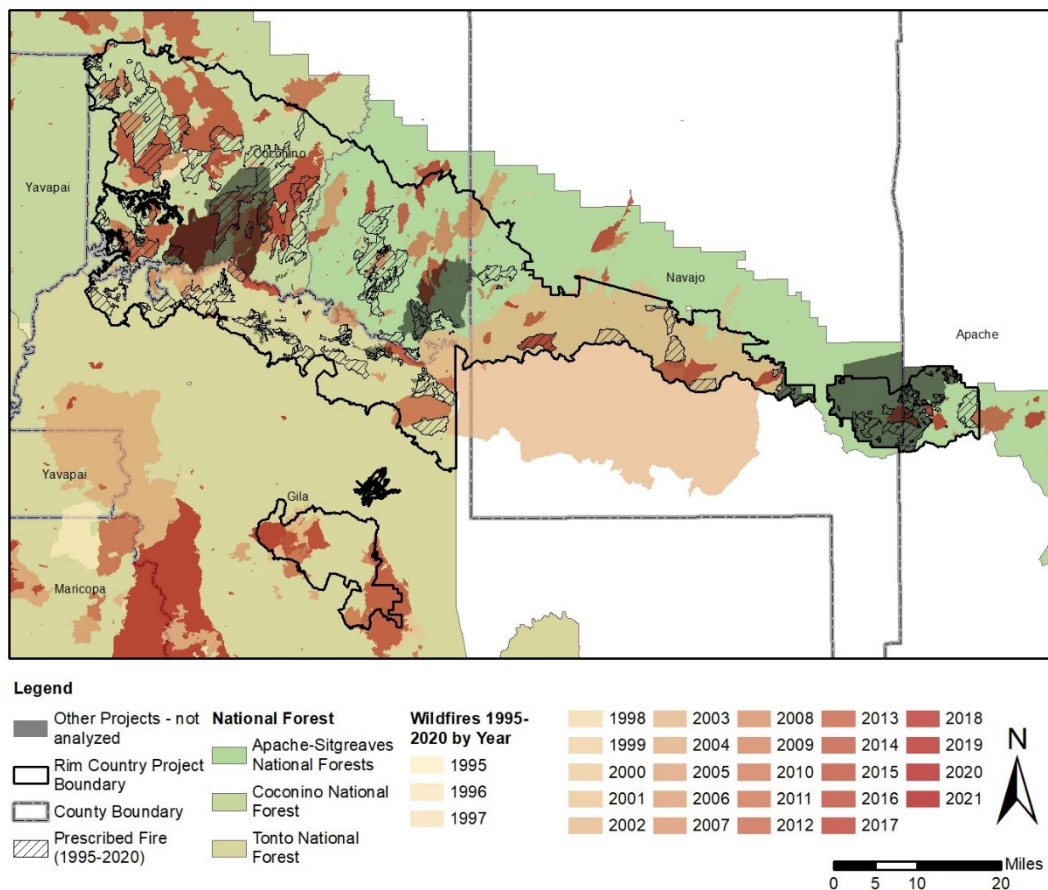


Figure 9: Location of recent Wildfire (1987 – 2020) and Prescribed Fire (1995 – 2020) within the project area.

Surface fuels and canopy characteristics

The ability of a forest to maintain its adapted resilience to fire depends, in part, on how close it is to threshold conditions that would support a fire of an intensity and severity to which it is not adapted. In frequent fire systems in which the fire regime has been interrupted, those conditions generally result from excessive surface and canopy fuels.

Canopy characteristics

The specific characteristics that determine the likelihood of crown fire initiation are tree densities (canopy cover, canopy base height, canopy bulk density, and canopy height) and surface fuels accumulations. While there are no specific desired conditions for these canopy characteristics, they are important variables to be addressed in proposed treatments. Generally speaking:

Canopy cover

Tree densities (canopy cover) affects the ability of fire to move from the canopy of one tree to the canopy of another, thus is a significant component in differentiating the potential for a stand to transition from passive to active crown fire. Additionally, tree canopies shade the surface, affecting surface vegetation which defines fuel structures and affects fuel moisture. Canopy cover

also affects surface wind speed, which, in turn, affects surface fire intensity and rate of spread. Across the project area, canopies have become much more closed, resulting in elevated potential for crown fire and decreased surface vegetation.

Table 6: Vegetation cover types targeted for restoration, and their desired and current fire regimes across the project area.

| Cover type | Acres of cover types | Natural Fire Regime | Fire Return Interval | | High Severity Fire | | | Average Annual Acres burned + | Average annual acres needed to burn to meet desired conditions |
|----------------------------------|----------------------|--|----------------------|-----------|------------------------------------|--|---|-------------------------------|--|
| | | | Desired (average) | Current++ | Desired | Recently Burned w/ Mod - High Severity++ | *Potential to Burn with High Severity Effects | | |
| Ponderosa Pine (montane) | 642,198 | 1 | 2 – 22 (12) | 38 | < 20 (<5% active crown fire) | 51% (27% High) | 20% | 14,495 | ~45,000 |
| Ponderosa Pine – Evergreen Oak** | 148,332 | 1, 3 | 1 – 60 (7) | 59 | < 25 (with <10% active crown fire) | 57% (29% High) | 29% | 2,477 | ~20,000 |
| Mixed Conifer – Frequent Fire | 52,723 | 1, 3 | 2 – 61 (15) | 65 | < 20 (with <7% active crown fire) | 51% (19% High) | 50% | 743 | ~3,200 |
| Aspen | 1,416 | 4 | 5 - 150 | 739 | N/A | N/A | 5% | 2 | ~15 |
| Grasslands | 15,946 | 2 | 2 – 40 (12) | 113 | <10% | 35% (12% High) | 2% | 379 | 3,600 |
| Riparian | 13,050 | Related to, but not the same as, adjacent cover types. | | | | | | | |

+ Average calculated across all stands with that cover type for the past 30 years (1987 – 2017) for wildfire plus the past 24 years (1995 – 2018) for prescribed fire

++Data from Monitoring Trends in Burn Severity from 1992 – 2015

**Evergreen Shrub Subclass included in acres, but not in desired condition

*Based on modeled fire behavior of active crown fire under extreme fire weather conditions

Canopy base height

Canopy base height is the lowest height of the part of the tree canopy which could support sufficient flames to propagate fire up into the rest of the crown (Scott and Reinhardt 2005). Canopy base height is a critical factor in crown fire initiation. In the last century, ladder fuels have effectively lowered the functional canopy base height as small trees and shrubs now provide ‘ladders’ by which flames can climb into tree canopies.

Canopy bulk density

Canopy bulk density is the mass per volume of the crown of a tree. Denser canopies have more fuel, and can burn with a higher intensity (longer flame lengths). They will ignite more easily than sparser canopies if fire reaches them and it is the primary component determining conditional crown fire.

Canopy height

Canopy height is the height of the top of the canopy of a forest. Its primary effect on fire behavior is spotting potential. Taller trees are likely to spot further than shorter trees if their crowns are burning.

Surface fuels

Wildland fuels are composed of various categories, including live and dead, small and large, and so on. Each plays a different role in fire behavior and effects. Coarse Woody Debris (CWD: diameter >3 inches) and duff are the highest contributors to total emissions in prescribed fires because prescribed fires are mostly surface fires, and little of the canopy fuels are consumed. Litter is a necessary component of fires in frequent fire systems because, particularly in dry, frequent fire forested systems, litter is what allows a surface fire to spread. Most of the heat produced by fine woody debris (FWD: <3 inches in diameter) and litter goes upwards. Duff and CWD can smolder for a long time, transferring excessive heat into the soil, cambiums, and other surface and soil components of an ecosystem than aerial fuels (fuels that are not in contact with the surface. High burn severity (fire effects to soil) is far more likely as the heat transferred to the soil can consume or kill soil biota and other organic matter in soil that is critical to soil function and productivity (Valette *et al.* 1994; Neary *et al.* 2005 (revised 2008); Lata 2006).

Litter and FWD are necessary components of surface fuel loading, providing continuity to carry a fire across the surface. Dry litter combusts relatively quickly during the flaming stage with little smoldering or smoke produced. It is a major component of surface fire intensity and behavior. CWD is an important contributor to healthy forest soils, and many habitat types. It's common for significant amounts of CWD to be consumed during the smoldering phase, generating more emissions that can impact air quality than fuels burning in the flaming combustion phase. Duff can also be a significant source of emissions and plays a role in feeder root structure. Duff and CWD can smolder for long periods of time, causing temperature impacts to the soil and generating large amounts of low buoyant smoke for weeks (Covington and Sackett 1984).

One of the more difficult problems to address in the restoration of a ponderosa pine forest from which fire has been excluded is the accumulation of litter and duff. Generally, the litter layer contributes to fire *intensity*, while the duff layer contributes to fire *severity*, (Sackett and Haase 1996; Hood 2007).

Historically, fine surface fuel loads were made up primarily of herbaceous material and fire burning though it would move relatively quickly, with a short residence time and a high rate of consumption. Repeated fires would consume coarse woody debris surface fuels a little at a time,

allowing natural accumulations from branches or snags to maintain equilibrium based mostly on fire frequency. (Covington and Sackett 1984).

Decades of fire suppression have allowed litter and duff layers to accumulate to levels that cause a multitude of problems that include (but are not limited to) fire behavior, direct and indirect fire effects, fire effects on soil productivity, interception of precipitation, nutrients locked up in organic matter, changes to soil chemistry, emissions, and physical suppression of surface vegetation contributing to a decrease in species diversity (Covington and Sackett 1984; Moir and Dieterich 1988; Neary *et al.* 2005 (revised 2008); Abella *et al.* 2007; Varner *et al.* 2007).

Currently, across much of the project area, surface fuels are dominated by needle litter and duff that has accumulated over years to decades and is more closely packed than herbaceous fuel. Fire burning through these fuels will have a longer residence time, or longer burning time, than in herbaceous fuels, and the lower layers may smolder for extended periods, transferring more heat to the soil, roots, and boles of trees (Lutes *et al.* 2009). Conversely, litter that has accumulated for just a few years, will burn almost completely, and quickly, with little detrimental impact from heat (Covington and Sackett 1992; Sackett and Haase 1998; Garlough and Keyes 2011).

Litter and duff cones have accumulated around the base of many large and/or old trees in the project area and are likely to cause, or contribute to, undesirable mortality (Egan 2011). Prescribed fire can produce fire behavior that is less likely to cause lethal damage.

These fuel layers cannot be practically addressed by mechanical means across the entire area proposed for treatment under any of the action alternatives, even if it was ecologically sound to do so. Mechanical treatments may move duff and litter around, creating temporary discontinuities in the surface litter layer, but the biomass remains on site.

Wildfire Management

Initially, and through most of the 20th century, wildfires burning in frequent fire regimes in the Southwest were relatively easy to suppress. Fuels were mostly light and flashy, and forests were open with high canopy base heights, and suppression was a common response. Many areas were increasingly overgrazed to the point where some areas could not carry fire at all and/or fires were easy to suppress. Settlers saw fire as a threat, and actively suppressed it whenever they could. The subsequent accumulation of fuel, through litter-fall, logging debris, and development of ladder fuels that can initiate crown fire (Covington and Moore 1994) made fire suppression more difficult. Surface fuel loading changed from light flashy fuels to compact needle litter, duff, and dead/down woody debris. Forests continued to grow denser, woody species increasingly encroached into non-forested areas, and shrubby species established and matured beneath increasingly dense canopies. This increased the severity of fire's effects, as well as the intensity of fire behavior. As wildfires became more difficult to suppress, firefighting technology, tactics, strategies, equipment and support improved dramatically, allowing suppression forces to succeed in suppressing all but the most intense and extreme fires. Most of the acres that burn now are from fires that have such extreme behavior that they overwhelm firefighting forces.

Wildland Urban Interface

The Wildland Urban Interface (WUI) is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels ((NWCG) 2018). It is that portion of the landscape where structures and vegetation are sufficiently close that a wildland fire could spread to structures, or a structure fire could ignite vegetation. WUI areas are scattered across the project area, though areas of the greatest concern are relatively focused

around towns or along travel ways. For this analysis, the wildland urban interface is defined by a 0.5 mile buffer surrounding non-Forest Service lands where structures are present (Figure 10). Other critical infrastructure (Transmission Lines and Communication sites) and high value Forest Service Infrastructure (Buildings and Recreation Sites) were also included within the WUI for this project.

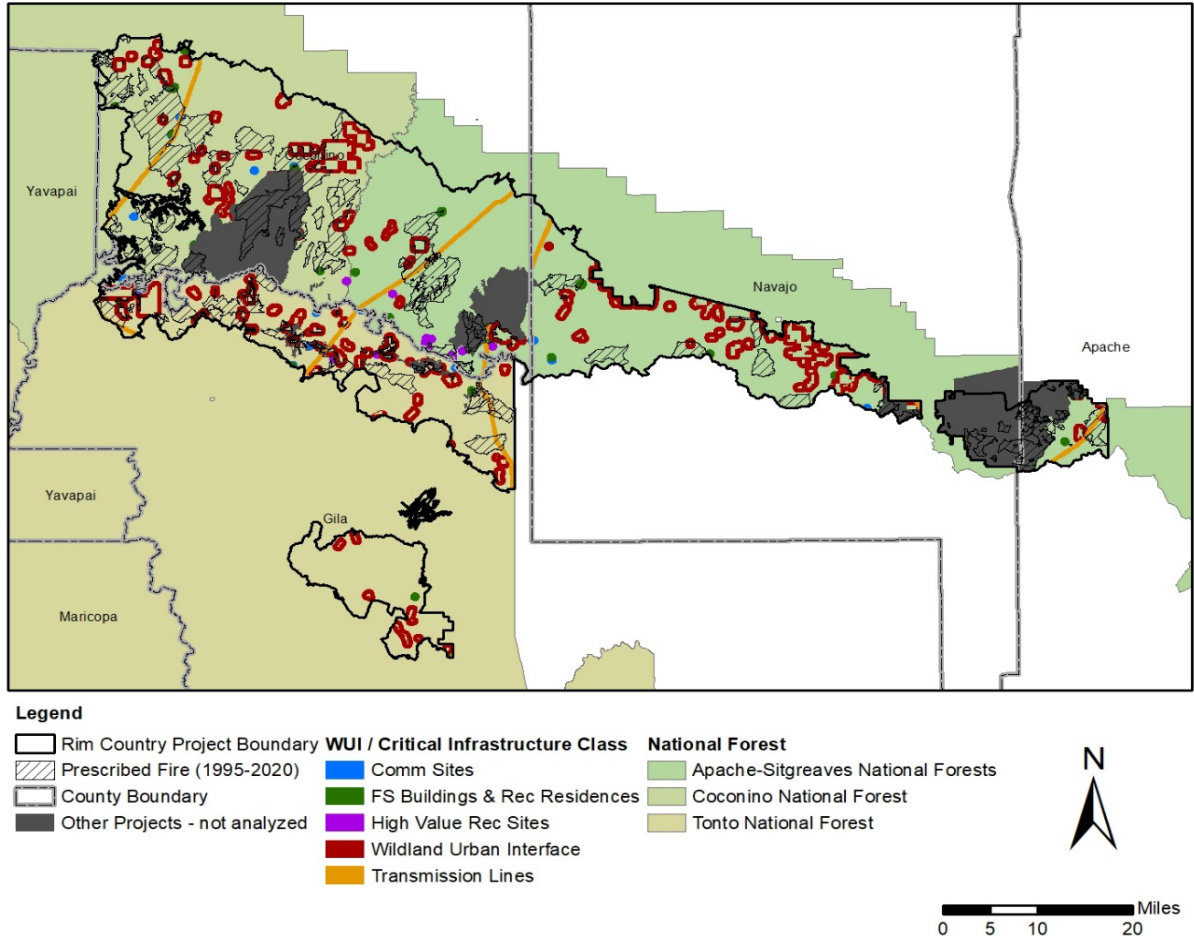


Figure 10: Wildland Urban Interface, as defined and mapped by this project. Recent prescribed fires are shown by hashed polygons.

Large trees

Large trees in the project area increase structural diversity, improving habitat for birds, insects, and other animals. Large trees have greater genetic diversity than even-aged groups of small trees, and provide forests a better chance of adapting to changing climate conditions and other environmental stressors (Minard 2002). Large trees within the project area are threatened by the increasing size and severity of wildfires. Across the west, the increasing severity of wildfires and the ensuing death of large and/or old trees have been linked to fuel accumulation resulting from a century of fire exclusion (Sackett *et al.* 1996; Covington *et al.* 1997c). Some of these fuels are deep duff and organic soil layers at the surface. They often burn with low intensity by smoldering combustion and, although temperatures are lower than in flaming combustion, residence times are much longer so more heat is transferred to cambiums, roots, and soil (Ryan and Frandsen 1991;

Hartford and Frandsen 1992; Hood 2010a).

Crown damage is an important factor in the mortality of large trees for which the death is attributed to fire (Fowler and Sieg 2004; Haase and Sackett 2008; Hood 2010b). The proximity of dense small trees and ladder fuels is problematic because it is so widespread. In the transitional pine areas various species of juniper and oak are components of the forest, often centuries old. The overtopping of these trees by ponderosa pine allows a buildup of needles in the crotches and forks. This can lead to greater mortality and/or damage to very large trees when highly flammable needle accumulations burn than would occur without the needle accumulations.

Vegetation Cover Types

The ecology and fire history for each vegetation cover type within the Rim Country project area is discussed in depth in the appendices. Below is just the discussion for the three primary target cover types: Ponderosa Pine (Montane), Ponderosa Pine – Evergreen Oak, and Dry Mixed Conifer.

Ponderosa Pine

This cover type includes all ponderosa pine other than the ponderosa pine/evergreen oak and transitional pine described in the next section. There are about 543,058 acres of this kind of ponderosa pine forest within the area being considered for restoration treatments.

Fire Ecology

Ponderosa pine forests are widespread in the Southwest occurring at elevations ranging from 6,000-7,500 ft on soils from igneous, metamorphic, and sedimentary parent materials with good aeration and drainage, and across elevational and moisture gradients. The dominant species is Ponderosa pine (*Pinus ponderosa* var. *scopulorum*). Other trees, such as Gambel oak (*Quercus gambelii*), pinyon pine (*Pinus edulis*), and juniper (*Juniperus* spp.) may be present. There is sometimes a shrubby understory mixed with grasses and forbs, although this type sometimes occurs as savannah with extensive grasslands interspersed between widely spaced clumps or individual trees. Canopy cover in the savanna areas is between 10 and 30%.

Historically, once fires ignited in ponderosa pine forests, they could burn until extinguished by rain, or until they ran out of fuel, which typically occurred when they reached an area that had recently burned. Fires could burn for months and cover thousands of acres (Swetnam and Betancourt 1990; Swetnam and Baison 1996; Swetnam and Betancourt 1998). Effects from these long burning fires would vary as conditions changed over the weeks or months they burned. As a result, most ponderosa pine in the southwest burned every 2 to 22 years as mostly low-severity, often area-wide fires (Weaver 1951; Cooper 1960; Deterich 1980; Swetnam *et al.* 1990; Swetnam and Baison 1996; Covington *et al.* 1997a; Fulé *et al.* 1997; Heinlein *et al.* 2005; Kaib 2011).

Open stands of ponderosa pine under a frequent fire regime are capable of supporting a contiguous understory of up to 1,600 pounds per acre of herbaceous fuels in frequently burned stands. These high levels are the result of frequent surface fires cycle nutrients, scarify seeds for many species via smoke and/or heat effects, increasing germination (Huffman and Moore 2004; Abella *et al.* 2007; Lata 2015), and reduce competition from woody reproduction. Frequent, surface fires kill small trees, but most grasses and forbs are only top-killed, and mature trees escape damage because of their high crowns and thick bark.

During drier, warmer, windier conditions, fires would have burned at higher intensities, but would

still have produced primarily low severity effects in the ponderosa pine forests of the southwest (Swetnam and Baison 1996; Fulé *et al.* 2004; Roccaforte *et al.* 2008). Ecological processes, including soil types, aspect, topography, and other physical geographic features, contributed to heterogeneous spatial patterns at all scales, with some patterns shifting through time within a natural range of variability (Moore *et al.* 1999; Allen *et al.* 2002b). Numerous documents (Drake 1910; Leopold 1924; Cooper 1960; Brown and Davis 1973; Dahms and Geils 1997) refer to historic ponderosa pine stands as open, park-like, and with a vigorous and abundant herbaceous understory. Captain Sitgreaves in 1854 describes an apparently typical ponderosa pine scene where "the ground was covered with fresh grass and well-timbered with tall pines" (Plummer 1904) (in Dahms *et al.* 1997).

Ponderosa pine has many fire-resistant characteristics. Even seedlings and saplings are often able to withstand fire. The development of insulative bark, meristems shielded by enclosing needles, and thick bud scales contribute to the heat resistance of pole-sized and larger trees. Propagation of fire into the crown of trees pole-sized or greater, growing in relatively open stands (dry sites), is unusual because of three factors. First, the tendency of ponderosa pine to self-prune lower branches keeps the foliage separated from burning surface fuels. Second, the open, loosely arranged foliage does not lend itself to combustion or the propagation of flames (compare this with the dense, foliage of spruce or fir). Third, the thick bark does not easily ignite and does not easily carry fire up the bole or support residual burning. Resin accumulations, however, can make the bark more flammable and may occur if trees have been fighting off insects, or sustained damage such as broken branches or deep abrasions on the bole. Understory ponderosa pine may be more susceptible to fire damage where crowded conditions result in slower diameter growth. Such trees do not develop their protective layer of insulative bark as early as do faster growing trees. They remain vulnerable to cambium damage from surface fires longer than their counterparts in open stands. The thick, overcrowded foliage of young stands or thickets also negates the fire-resisting characteristic of open, discontinuous crown foliage commonly found in this species. Ponderosa pine seedling establishment is favored when fire removes the forest floor litter and grass and exposes mineral soil. Fire resistance of open, park-like stands is enhanced by generally light fuel quantities of flashy fuels. Heavy accumulations of litter at the base of trunks increase the intensity and duration of fire, often resulting in a fire scar or "cat face" when a fire does burn through the area and that part of the bole next to the fuel accumulation is subjected to more heat. New resin ducts develop around wounds to help protect trees although, if the wound doesn't heal before the next fire, the additional flammable resin deposits around wounds can make an individual tree susceptible to fire damage and can enlarge existing fire scars.

The denser and younger stand structures of the historic ponderosa pine forest were the result of special circumstances in the interaction of climate, site, and disturbances. Even though ponderosa pine reproduction was negligible in some years, there were occasional wet cycles as long as 15 to 20 years without fires when ponderosa pine would regenerate (Swetnam and Dieterich 1985). This regeneration cycle required seed production, establishment, and survival to an age at which the young tree could successfully compete and endure surface fires. When single or small groups of trees died and fell, they were inevitably consumed by surface fires, producing severe but localized fire effects that reduced grass competition, and created favorable microsites for seedling establishment (Cooper 1960).

History

An area now within the Coconino National Forest is described in a U. S. Geological Survey (1904) report as: "A yellow-pine forest, as nearly pure as the one in this region, nearly always has an open growth, but not necessarily as lightly and insufficiently stocked as in the case in this

forest reserve. The open character of the yellow-pine forest is due partly to the fact that the yellow pine flourishes best when a considerable distance separates the different trees or groups of trees. " (Dahms and Geils 1997). In a report written in 1910 by Willard M. Drake, Acting Forest Supervisor of the Coconino National Forest wrote: "...Western Yellow Pine, (*Pinus ponderosa*) is the characteristic species generally forming in this type a nearly pure and often very open stand of mature timber with few young trees in the mixture. Only in very scattered areas do the crowns form anything like a continuous cover..."

Although the popular early descriptions of the ponderosa pine forest call attention to the park-like stands, there are some descriptions which refer to areas with dense cover (Woolsey 1911). An accurate picture of the pre-settlement ponderosa pine forest would probably describe a mosaic of mostly open, grass savanna and clumps of large, yellow-bark ponderosa pine and open forest with an occasional dense patches or stringers of small, blackjack pines (young ponderosa pine). Ponderosa pine naturally regenerate infrequently, but when they do, they reproduce with an overabundance of seedlings and a high rate of juvenile mortality (Pearson 1931).

Extensive stand-replacing fires are unreported in the documentary records prior to circa 1950 (Cooper 1960; Allen *et al.* 2002a). Ponderosa pine does not sprout, so crown fire generally produces 100 percent mortality. There are few data available to indicate how much high severity fire was typical across the ponderosa pine in northern Arizona, but simulations suggest that presettlement forest structure would have supported very little crown fire, passive or active (Roccaforte *et al.* 2008, Covington 2002). Modeled historic conditions in Southwestern ponderosa pine indicate that up to 17% of the area may have supported active crown fire with windspeeds of 43 mph (Roccaforte *et al.* 2008), with less under conditions close to those modeled for this analysis for montane ponderosa pine.

Historically, passive crown fire produced only small patches of high severity effects. Extrapolating results from Roccaforte *et al.* (2008) to those conditions used for modeling Rim Country, patches of high severity, mostly in the form of passive crown fire, would generally have been less than 50 acres in size under those conditions modeled for Rim Country. These patches would occur in areas with windthrow, disease/insect infestation, area ecotones between ponderosa pine and mixed conifer or PJ, or other site-specific situations that would allow crown fire initiation and spread. A number of papers have been published challenging the assertion that high severity fire was historically rare in the dry forest systems prevalent in the Rim Country project area (Baker and Ehle 2001; Baker *et al.* 2007; Williams and Baker 2012, 2014; Baker 2015) However, Fule *et al.* (2012) concluded that, "the preponderance of scientific evidence indicates that conservation of dry forest ecosystems in the western United States and their ecological, social and economic value is not consistent with a present-day disturbance regime of large, high-severity fires, especially under changing climate".

Ponderosa Pine – Evergreen Oak & Transitional pine (PPEO)

The ponderosa pine/evergreen oak (PPEO) cover type in this analysis includes vegetative associations which have been referred to by various classifications and names, including transitional pine, Arizona highlands, Ponderosa Pine/Evergreen Oak ERU, Mogollon highlands, various Madrean fringe types (Fleischner *et al.* 2017; Wahlberg *et al.* 2017 (in draft); Huffman *et al.* 2018). In order to be consistent, this analysis will use the broadest classification, 'Ponderosa Pine/Evergreen Oak' (PPEO) to refer to this broad ecosystem, with more detailed discussion as needed to include unique characteristics.

PPEO occurs in the mild climate gradients of central and southern Arizona, particularly below the

Mogollon Rim, where warm summer seasons and bi-modal precipitation regimes are characteristic. These vegetation types occur at a biogeographic crossroads, contributing to a tremendous ecological diversity in this part of the Rim Country project area. (Fleischner *et al.* 2017). Generally, PPEO occurs from 5,500 –7,200 feet and is dominated by ponderosa pine. PPEO can be distinguished from montane ponderosa pine by well-represented evergreen oaks. It may also include pinyon pine (*Pinus edulis*) and alligator juniper (*Juniperus deppeana*) as co-dominant species (Brown 1994; Wahlberg *et al.* 2017 (in draft)). In places, ponderosa pine forests co-occur with interior chaparral and Madrean woodland communities (Huffman *et al.* 2018), sometimes as inclusions, and sometimes as more extensive adjacent types, often aspect-driven. Wahlberg *et al.* (2017 (in draft)) describe an ‘Evergreen Shrub Subclass’ within the PPEO that favors high shrub cover and higher fire severity than in the matrix PPEO forest. These transitional forests commonly occur on xeric sites, and rather than the herbaceous communities typical of montane forests, shrubs presently dominate the understories of many transitional ponderosa pine systems. Much less is known about these ecosystems compared to the montane ponderosa communities, yet transitional forests are important components of biodiversity on southwestern landscapes. Because transitional forests occur at the environmental limits of ponderosa pine, they are vulnerable to rapid changes in terms of tree mortality as the climate warms and periodic droughts become more frequent and severe (Huffman *et al.* 2018).

Fire Ecology

Research in other areas pine/shrub systems found that moderate intensity frequent fires favor ponderosa pine forest while fires that are less frequent but greater severity favor resprouting shrubs. poses a challenge for management and for proposed restoration treatments.

PPEO forests differ from montane ponderosa pine by site potential, typically favoring high shrub cover, and by higher fire severity, and more even-aged conditions characteristic of mixed-severity fire regimes. Some high-density evergreen shrub patches exhibit infrequent, high severity fire (fire regime IV; stand replacement at 35-200 years). Larger areas where this pattern was persistent are likely to be identified as Interior Chaparral.

PPEO averages greater fire severity than the montane ponderosa pine forests above the Mogollon Rim, and greater patchiness with less horizontal uniformity and more even-aged conditions. Site potential, fire history, and the importance of perennial grasses versus shrubs in the understory vary, affecting forest structure and the disturbance regime (Wahlberg *et al.* 2017 (in draft)). Understory shrubs include manzanita (*Arctostaphylos* sp.), turbinella oak (*Quercus turbinella*), skunkbush sumac (*Rhus trilobata*), and mountain mahogany (*Cercocarpus montanus*).

History

It is well understood that 20th century fire exclusion in ponderosa pine forests has led to substantial increases in tree establishment and associated changes in ecological function (Covington and Moore 1994; Fulé *et al.* 1997; Moore *et al.* 1999; Savage and Mast 2005; Strom and Fulé 2007a). Much less is known about historical changes associated with modern land use in the PPEO. Some species in the PPEO are often growing at their environmental limits and thus can be under high levels of stress within ecotones, thus these zones where communities intergrade are often dynamic and fluctuate in composition over relatively small spatial and temporal scales. It appears that cover of long-lived sprouting shrubs has increased in many transitional ponderosa pine forests as a result of fire exclusion (Huffman *et al.* 2018).

Historical fire regimes in pine forest communities co-occurring within interior chaparral and Madrean evergreen woodland appear to have been characterized by frequent, low-severity surface

fires similar to those widely reported for montane ponderosa pine forests of the Southwest. Frequent fires likely kept forests in open structural conditions and limited establishment and regeneration of sprouting woody species. As was prevalent in other southwestern ecosystems, unregulated livestock grazing in the late 19th and early 20th centuries apparently reduced abundance of herbaceous plants in ecotone communities (e.g., in both ponderosa pine forests and chaparral shrublands), and interrupted fire regimes. Intensive harvesting of ponderosa pine for mining materials in the mid-1800s undoubtedly contributed to later shifts in forest structure at some sites. Fire regime interruption in the Southwest appears to have allowed shrubs as well as young trees to increase in abundance within transitional pine forests. Similarly, less frequent fire in adjacent shrublands allowed ponderosa pine trees to establish and expand into these communities. Active fire suppression beginning in the mid- 1900s likely exacerbated structural shifts of both pine forests and shrublands. The ultimate effect of these anthropogenic influences has been to encourage broader, more complex ecotones, with ponderosa pine trees found overtopping shrubs on both historical forest sites as well as historical shrubland sites. Additionally, research indicates that fire exclusion due to historical intensive livestock grazing and tree harvesting has led to a broadening of ecotone boundaries, with shrubs increasing within pine forests as well as coniferous trees expanding into chaparral and evergreen woodlands. (Huffman *et al.* 2018).

Mixed Conifer

“Mixed Conifer” includes a wide range of vegetation types and fire regimes. Mixed conifer has been classified into warm/dry, or cool/moist (Romme *et al.* 2009; Korb *et al.* 2013; Wahlberg *et al.* 2017 (in draft)), which can also be distinguished by their natural fire regimes. In this analysis, mixed conifer will be referred to as WMC (Mixed Conifer with Aspen, or Wet Mixed Conifer) or DMC (Mixed Conifer - Frequent Fire, or Dry Mixed Conifer).

Historically, mixed conifer in the southwest had highly diverse composition and structure. This diversity was largely driven by topography, with the scale of the mosaic of cover types dependent on the scale of topographic variation. Ridgetops and low elevation sites were (and largely still are) characterized by open stands dominated by ponderosa pine and had frequent surface fires. South and west-facing slopes likely were similar, but were less open and had less ponderosa and more Douglas-fir, aspen and white fir. These stands likely also were characterized by frequent surface fires. North and east-facing slopes were likely more dense and had still less ponderosa and more white fir, as well as Engelmann spruce and subalpine fir, especially at higher elevations. Douglas fir (*Pseudotsuga menziesii*) tends to dominate drier sites where ponderosa pine does well. *Abies concolor* tends to dominate cooler sites, such as upper slopes at higher elevations, canyon sideslopes, ridgetops, and north and east-facing slopes which burn somewhat infrequently. *Picea pungens* is most often found in cold, moister locations, often occurring as smaller patches or frost bands within a matrix of other associations. As many as seven conifers can be found growing in the same stand.

Tree species found in mixed conifer forests exhibit a wide range of tolerance to shade and low severity fire; these traits are often related (Strahan *et al.* 2016). Those species adapted to establish and grow in low light conditions below other trees often have thin bark and are easily killed by fire (Evans *et al.* 2011). Conversely, ponderosa pine is well adapted to fire, having thick, insulating bark. On the ground, there is a gradient of biotic and abiotic factors, with some sites being clearly wet or dry mixed conifer, and many sites in a grey area between that can be difficult to identify clearly as one or the other, either in existing condition or historic condition (12). This is particularly true where the disturbance cycles have been interrupted, and vegetation is

significantly departed from historic conditions. Some sites have become so dominated by shade-intolerant species that their classification as DMC was changed to WMC (Margolis and Malevich 2016). Below are descriptions of WMC and DMC as they apply to this analysis.

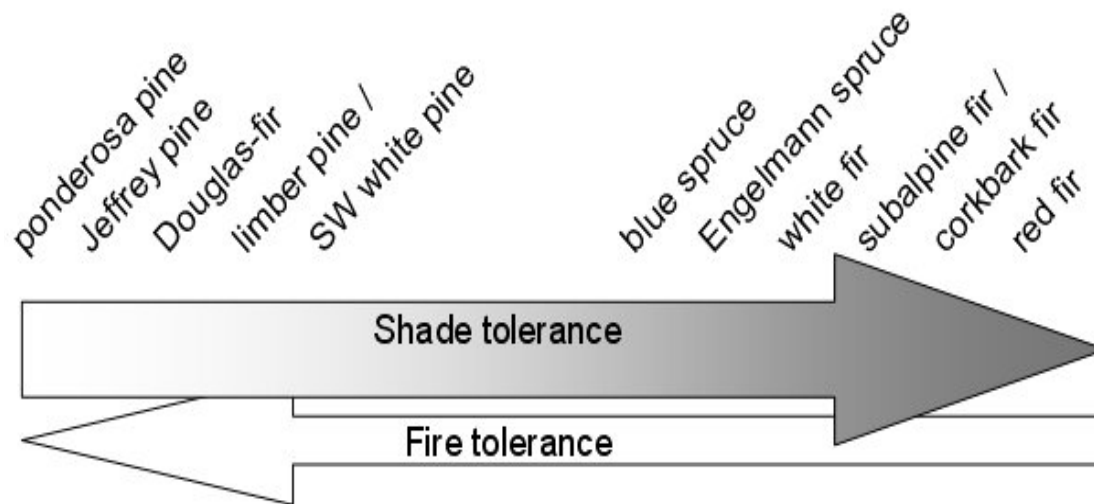


Figure 11: Relative shade and fire tolerance of common tree species in mixed conifer forests (from Burns *et al.* 1990)

Mixed Conifer with Frequent Fire (Dry Mixed Conifer)

Dry Mixed Conifer (DMC) covers approximately 63,000 acres within the area proposed for treatment in Rim Country. It generally occurs at elevations between 6,000 and 10,000 feet, with some variability depending on aspect. DMC is generally situated between ponderosa pine or pinyon-juniper woodlands below and wetter mixed conifer or spruce-fir forests above. Historically, DMC was dominated by ponderosa pine (*Pinus ponderosa* var. *scopulorum*) in an open forest structure (Reynolds *et al.* 2013; Rodman *et al.* 2016; Huffman *et al.* 2018), with minor occurrence of aspen (*Populus tremuloides*), Douglas-fir (*Pseudotsuga menziesii*), white fir (*Abies concolor*), and Southwestern white pine (*Pinus strobiformis*). Species vary in relation to elevation and moisture availability and are mainly shade intolerant trees. In lower elevations and drier areas, Douglas-fir, Gambel oak, ponderosa pine, piñon, and juniper may co-dominate. In higher elevations and moister areas, ponderosa pine may co-dominate with Rocky Mountain Douglas-fir, aspen, white fir, southwestern white pine, and Rocky Mountain juniper. The understory can be composed of a wide variety of shrubs, grasses, sedges, rushes, and forbs depending on the soil type, aspect, elevation, disturbance history, and other factors (Wahlberg *et al.* 2017 (in draft)).

Fire Ecology

Historical fire regimes were probably similar to those widely reported for montane ponderosa forests of the Southwest. Frequent surface fires likely kept forests in open structural conditions and limited the abundance of woody understory species. A 2015 study that included areas on the Black Mesa Ranger District of the Apache-Sitgreaves National Forest, fire return intervals ranged from about 2 to 60 years, averaging about 12 (Heinlein *et al.* 2005; Huffman *et al.* 2015). Available evidence in DMC forests suggests that high severity patches would have been generally less than 60 acres, and typically less than one acre with the larger patches being less common (Huffman *et al.* 2015; Yocom Kent *et al.* 2015).

History

Tree establishment patterns compared with widespread fire dates did not suggest historical high-severity fires at the site level. Strong evidence of high-severity fire at finer scales was lacking, though spatial locations of ‘young’ plots suggested the possibility of historical high-severity disturbances. The historical fire regime on this landscape was one of high frequency, low-severity fires (Huffman *et al.* 2015). This would have supported a finer grained pattern of vegetation than is currently present. Current conditions show a coarser pattern that would be more consistent with a less frequent, mixed to high severity fire regime, increasing the susceptibility to stand-replacing fire, even where such regimes were uncommon historically (Abella and Springer 2014; Rodman *et al.* 2016). Fire and drought tolerance have decreased since pre-settlement times, driven largely by increases in the relative importance of white fir (*Abies concolor*) and southwestern white pine (*Pinus strobiformis*), but also shifts from shade intolerant species to shade tolerant species (Strahan *et al.* 2016).

Desired and Existing Conditions for Metrics and Measures

Fire Type

Desired Conditions

The desired conditions for fire type generally depends on the vegetation cover type and the proximity to other highly valued resources and assets. For the target vegetation cover types in the project area, the desired conditions are to have less than approximately 20 - 25% of the cover type experience crown fire, with no more than 5 – 10% being active crown fire (see Table 9 below). These values should be lower within the wildland urban interface (WUI).

Rather than preventing fires from burning on this landscape, there is a desire for fires to burn with intensities producing predominantly low to mixed severity fire effects.

Existing Conditions

Currently, under extreme weather, 73% of the Rim Country project area is expected to burn with crown fire, and 30% of that is expected to be active. This assumes a wind of 20 MPH which regularly occurs during the fire season (Figure 13) but represents extreme fire weather under which suppression tactics are unlikely to be highly successful.

Post wildfire watershed effects increase with the percent of the watershed that burns at moderate to high severity fire (Cannon 2010; Neary 2011). Currently, 44 watersheds have expected active crown fire under extreme weather conditions for over 30% of the watershed, which would result in high severity effects (Figure 16). Thirteen watersheds have over 50% of the watershed expected to burn with active crown fire. Watersheds 7 (Reynolds Creek) and 56 (Durfee Draw-Chevelon Canyon) have the highest proportion of potential for active crown fire (68% for both). If a wildfire were to burn within these watersheds, detrimental post wildfire effects would be expected

Fire Hazard Index

Desired Conditions

The fire hazard index is not specifically identified in Land Management Plans and therefore, there are no desire conditions. Rather it is a composite measure that represents an overall hazard both during a fire event and after an event (see Table 4 above). Areas with higher FHI are expected to burn with undesirable fire behavior that makes suppression difficult and dangerous. In addition to the immediate fire behavior, high FHI values are also expected to produce undesirable post fire

effects such as increased chances of debris flows, erosion, invasive weeds and vegetation type conversion. The lower the FHI, the less chances such undesirable fire effects are to occur, and there is less need for treatment resulting in a more fire adapted the landscape.

Existing Conditions

Currently 36% of the Rim Country project area has an FHI of moderate or higher (Figure 19), which presents difficult and dangerous suppression conditions during a wildfire and potential for adverse post fire effects on soils and surface water quality. Four percent of the landscape is in the very high category.

There are 20 watersheds with over 50%¹ of the watershed in the moderate to very-high FHI categories (Figure 20). Watershed 7 (Reynolds Creek, 76%) and 59 (Upper Spring Creek, 77%) have the highest proportion of FHI in the moderate to very high class. Large wildfires in these watersheds have a high potential to be difficult and/or dangerous to suppress, and for adverse post fire effects.

Surface fuels

Desired Conditions

Land Management Plan direction is shown below in Table 7, along with surface fuel loadings that are 'recommended' in regards to fire effects. Recommended surface fuel loadings are estimates, based on the best available science and expert opinion (Ottmar 2015) on the interaction of surface fuel loading with fire behavior and fire effects.

Combining maximum recommended fuel loadings from the Land Management Plans for ponderosa pine types in a healthy ponderosa pine forest, total recommended surface fuel loading is approximately 27 tons/acre.

For dry mixed conifer, little information was available for surface fuel loading other than CWD for dry mixed conifer, so recommendations were taken from Wahlberg et al. 2017 based on Contemporary Model State E dominated by ponderosa pine. Recommended CWD levels for Dry Mixed Conifer include the broadest range of the Land Management Plans, and will be 5 – 15 tons/acre. Recommendations used for all other surface fuel components in dry mixed conifer, as shown in Table 7, are as follows: duff less than 5.5 tons/acre, litter less than 4 tons per acre, FWD less than 6 tons/acre. Total recommended surface fuel loading should be less than 30 tons/acre (Wahlberg *et al.* as of January, 2016, still in draft still in draft #84).

If the total surface fuel loading exceeds the recommended surface fuel loadings indicated in Table 7, there would be potential for undesirable direct and indirect fire effects including tree mortality from needle scorch and/or root/cambium damage, consumption of organic matter in the top layers of soil affecting living roots, seeds, mycorrhizae, and heat damage to the soil. Furthermore, smoke from excessive surface fuel loading burning in wildfires under unfavorable conditions could negatively impact air quality (Hardy *et al.* 1998). While these recommended levels are not 'desired conditions', this analysis will inform a discussion on the potential fire effects from surface fuel loading that directly or indirectly would affect desired conditions. This metric (total surface fuel loadings) is used as a general recommendation, though site specific needs would vary across the treatment area.

¹ Percentage values are based on USFS lands only within a given watershed.

Existing Conditions

Desired conditions for total surface fuel loadings are less than 27 tons/ac in Ponderosa Pine vegetation types and less than 30 tons/ac in Dry Mixed Conifer. Currently, surface fuel loadings exceed recommended levels for 60,023 acres of Ponderosa Pine and 12,262 acres of Dry Mixed Conifer vegetation types (Figure 16).

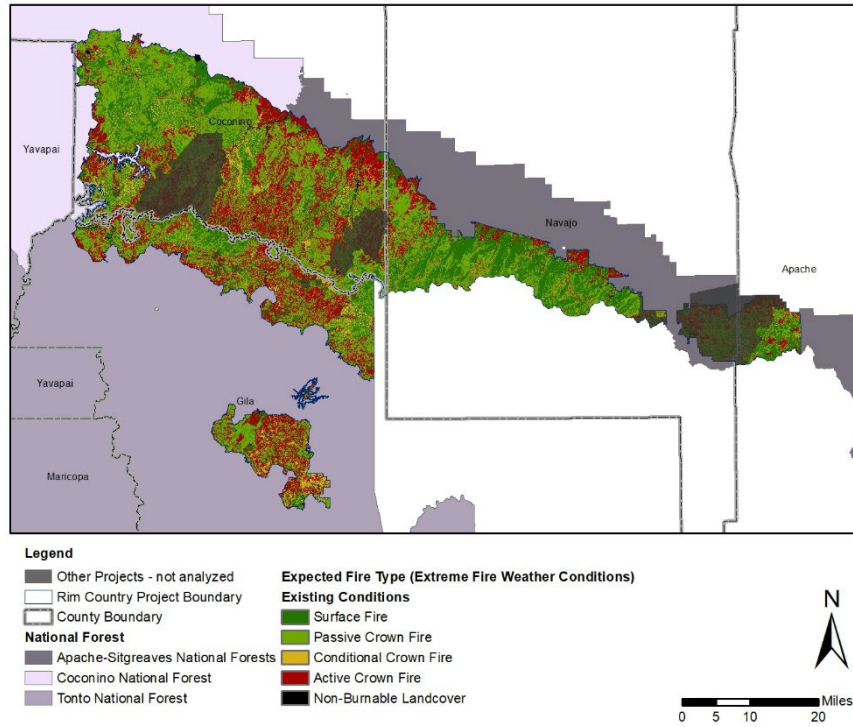


Figure 13: Expected Fire Type for Existing Conditions, under modeled weather conditions.

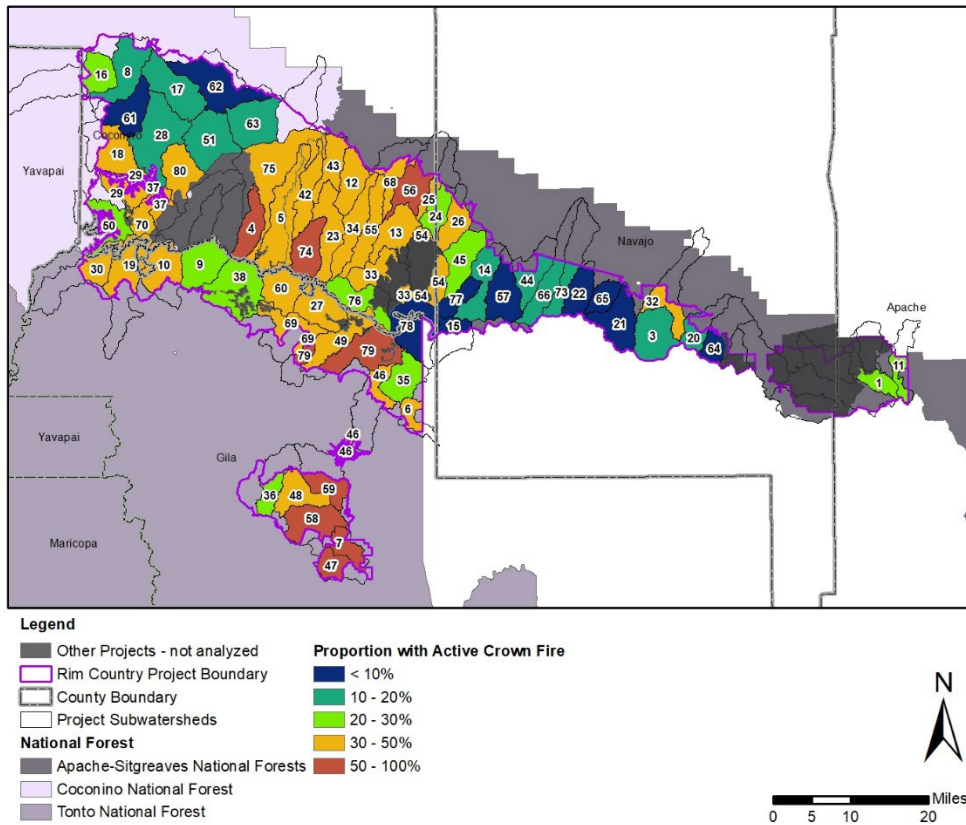


Figure 12: Existing Conditions Proportion of HUC6 watersheds with expected Active Crown Fire, under modeled weather conditions.

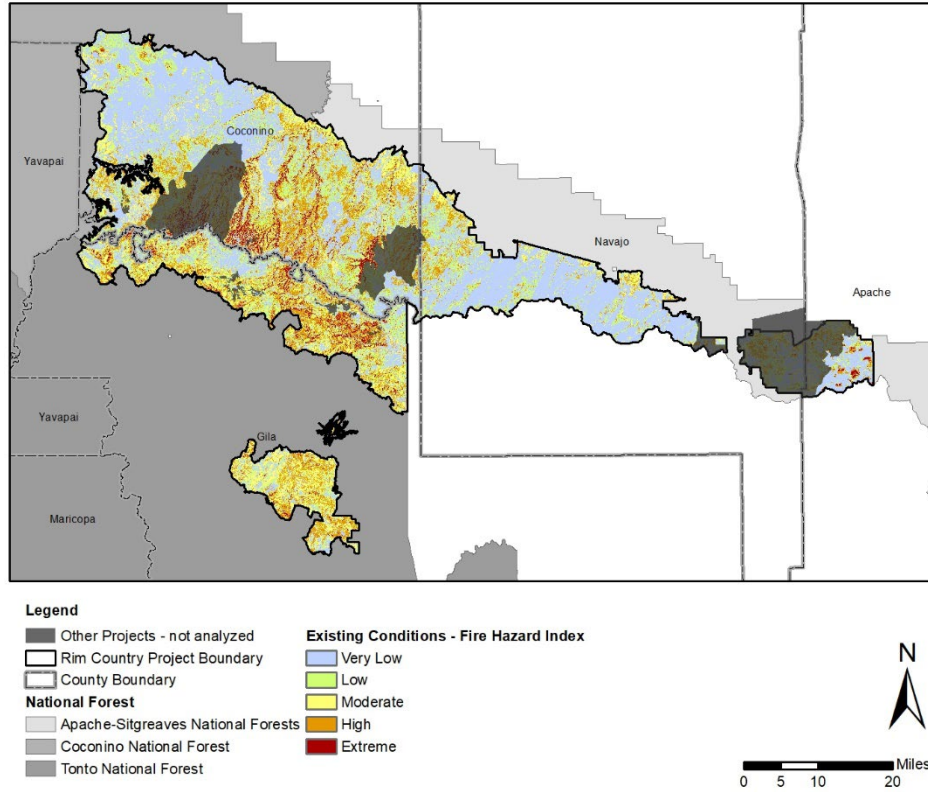


Figure 14: Fire hazard Index for Existing Conditions, under modeled fire weather

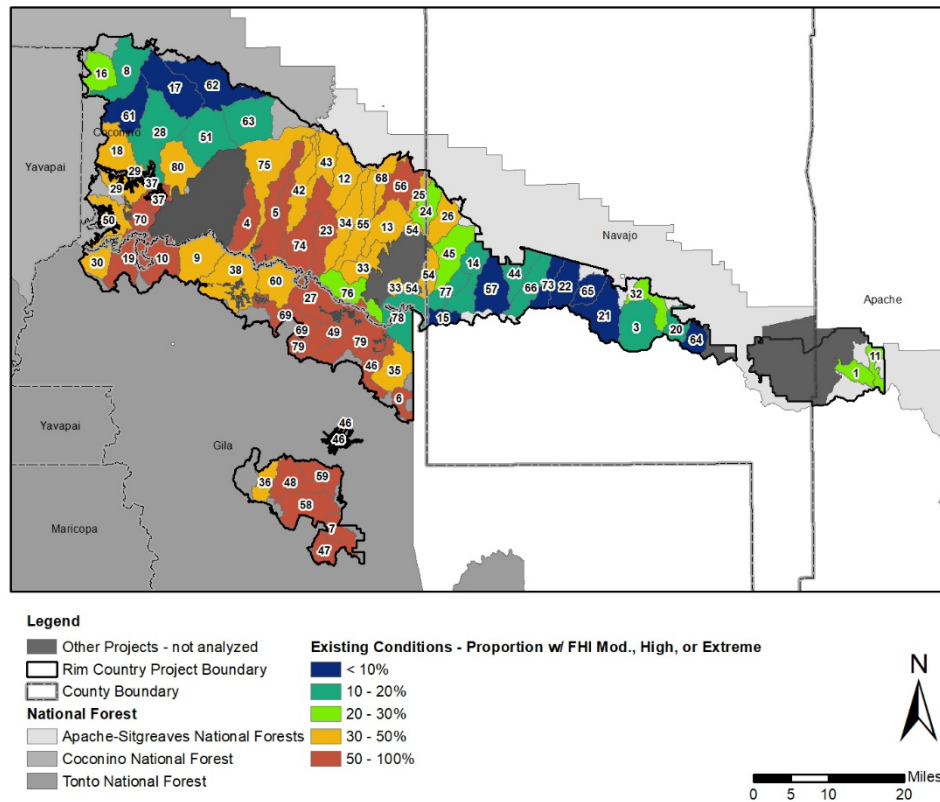


Figure 15: Proportion of each HUC6 watershed with FHI in the moderate, high or very high category for Existing Conditions, under modeled fire weather

Table 7: Land Management Plan direction for surface fuel loading that significantly affect fire behavior, fire effects, and/or emissions.

| Cover Type | Type of Fuel (tons/acre) | Tonto | Coconino | Apache / Sitgreaves | Recommended for the Rim Country Project area* | Acres exceeding recommended levels |
|---|--------------------------|---|--|---|---|------------------------------------|
| Ponderosa Pine & Ponderosa Pine/Evergreen Oak | CWD | 5 – 7 (or as directed by the current Land Management Plan) | 3-10 | 3 - 10 | Total Levels < 27 tons/acre | 60,023 acres |
| | FWD, litter, duff | "Maintain a minimum of 30% effective ground cover for watershed protection and forage production...Where less than 30% exists...goal is to obtain a minimum of 30% effective ground cover." Multiple references to 'suitable ground cover'. | "Ground cover consists primarily of perennial grasses and forbs capable of carrying surface fire,... A mosaic of dense cover, high amounts of litter, and bare ground provide habitat for a variety of species..." | "...60 percent or greater of soil cover is composed of grasses and forbs as opposed to needles and leaves." | | |
| Mixed Conifer – Frequent Fire | CWD | 10 – 15 (or as directed by the current Land Management Plan) | 5 - 15 | 5 - 15 | Total Surface Fuel Loads < 30 | 12,262 acres |
| | FWD, litter, duff | "Maintain a minimum of 30% effective ground cover for watershed protection and forage production...Where less than 30% exists, it will be the management goal to obtain a minimum of 30% effective ground cover." Multiple references to 'suitable ground cover'. | "...A mosaic of dense cover, high amounts of litter, and bare ground provide habitat for a variety of species... Graminoids, forbs, shrubs, needle cast (fine fuels), and small trees maintain the natural fire regime..." | "...60 percent or greater of soil cover is composed of grasses and forbs as opposed to needles and leaves." | | |

*Informed by consult with Roger Ottmar (Ottmar 2015)

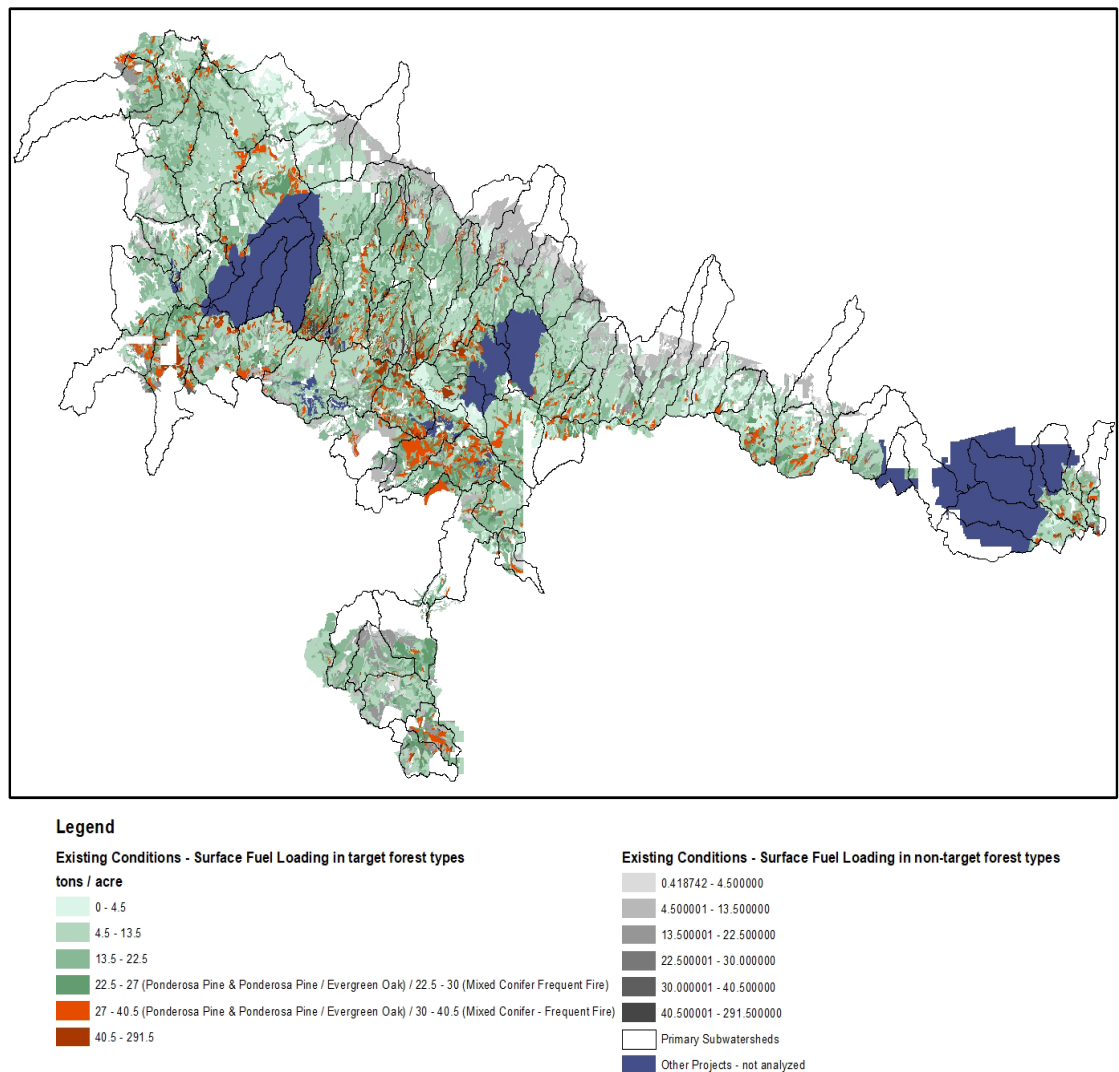


Figure 16: Total Surface Fuel Loadings in tons per acre. Areas in orange and red exceed recommended levels.

Desired and Existing Conditions for Resources, Values and Assets

Wildfire Management

Desired Conditions

- Ensure safe, effective, and efficient Wildfire Response.
- Human life, property, and natural and cultural resource are protected within and adjacent to NFS lands.
- Wildland fires burn within the range of frequency and intensity of natural fire regimes. Uncharacteristic high severity fires rarely occur and do not burn at the landscape scale.
- Wildland fire maintains and enhances resources and functions in its natural ecological role.

-
- 1 Public and firefighter safety is the highest priority in managing fire.*
 - 2 Wildland fires burn within the historic fire regime of the vegetation communities affected. High-severity fires occur where this is part of the historical fire regime and do not burn at the landscape scale.*
 - 3 Wildland fires do not result in the loss of life, property, or ecosystem function.*
 - 4 People understand that wildland fire is a necessary natural disturbance process integral to the sustainability of the ecosystems in which fire is the primary disturbance.*

It also states that wildland fire . . . “would be used to protect, maintain, and enhance resources and, as nearly as possible, be allowed to function in its natural ecological role as a disturbance factor in the ecosystem.” (USDA and USDOJ 2009)

The Cohesive Strategy takes a holistic approach to the future of wildland fire management, and identifies three primary, national goals:

- Restore and Maintain Landscapes, making them resilient to fire-related disturbances.
- Create Fire-adapted Communities.

The priorities for managing wildland fire will be the protection of public and firefighter safety, property, natural and cultural resources to minimize negative impacts

Desired conditions include fuel conditions that expand opportunities to manage natural ignitions to achieve the resource benefits outlined in this report.

Existing Conditions

Currently there are many conditions that prevent management of wildfires in a manner that does not result in the loss of life, property or ecosystem function. Not all wildfires are currently burning within natural fire regimes. Recent economic and ecological high loss wildfires in the area include the Rodeo Chediski, Whitewater Baldy, and Wallow fires. The Rodeo Chediski fire destroyed 426 residences.

The recent Tinder Fire, which burned within the project area, consumed 41 homes in 2018.

The dude fire of 1990 claimed 6 lives and 63 homes.

Schultz and Highline fires both resulted in post wildfire debris flows that resulted in deaths.

https://www.nifc.gov/fireInfo/fireInfo_stats_histSigFires.html

Lowering the probability of large-scale high severity fires, particularly around areas adjacent to the wildland urban interface, will move the landscape towards the desired conditions of safe, effective wildfire management.

Wildland Urban Interface

Desired Conditions

Safe and effective firefighting environment where suppression activities are likely to be successful in preventing fire transmission into urban areas to mitigate against the loss of structures and threats to firefighter and public safety. WUI should generally have more open canopies and higher canopy base heights to prevent crown fire initiation and spread. While the

overall desire on the landscape is to have <10% active crown fire in the target cover types, withing the WUI this percentage should approach zero.

Because the WUI contains high concentrations of highly valued assets, it represents a portion of the landscape where stand conditions should prevent mixed and high severity fire effects to the extent practicable.

Existing Conditions

Prescribed fire is often focused on areas strategic to Wildland Urban Interface, and many prescribed burns next to WUIs have been implemented in the past 24 years. While this has lowered fire hazard within this area relative to the general landscape, desired conditions are not fully met, where 26% - 31% of the lands surrounding the WUI have potential for active crown fire and 34% - 38% are in the moderate to very high fire hazard index category (Table 8)

Table 8: Existing Conditions Metrics for the Wildland Urban Interface Classes

| Existing Conditions | | Fire Hazard Index | | | | Fire Type | |
|-------------------------------|-------------|-------------------|----------|------|---------|-----------------------------|-------------------|
| WUI Class | Total Acres | Very Low - Low | Moderate | High | Extreme | Passive & Active Crown Fire | Active Crown Fire |
| Communication Sites | 13,333 | 67% | 13% | 18% | 2% | 75% | 26% |
| FS Buildings & Rec Residences | 10,548 | 62% | 11% | 21% | 5% | 76% | 31% |
| High Value Rec Sites | 5,581 | 64% | 9% | 21% | 7% | 83% | 31% |
| Non-FS Land with Structures | 144,691 | 66% | 16% | 16% | 3% | 70% | 28% |
| Transmission Lines | 28,885 | 66% | 16% | 15% | 3% | 65% | 30% |

Large Trees

Desired Conditions

Ideally, there would be low levels of surface fuels (litter, duff, organic soil, CWD) in the immediate vicinity of old trees, and no ladder fuels sufficiently close for flame impingement should the ladder fuels ignite.

Existing Conditions

Currently, across much of the project area, fuel loads of all kinds in the immediate vicinity of large and/or old trees are such that mortality would be high in the event of a wildfire burning under undesirable conditions. In the historic period, mortality in large trees was mostly caused by lightning fires, dwarf mistletoe, bark beetles, windthrow, or senescence (Cooper 1960). Since the exact location of Large/old trees is unknown the analysis of this value at risk is qualitative and comparisons will be made as such.

Vegetation Cover Types

The desired and existing conditions for the primary target cover vegetation cover types are discussed below. A detailed discussion of the desired and existing conditions for the other vegetation cover types in Rim Country can be found in the silviculture specialist report. Table 9 shows a summary of the metrics measured for each vegetation cover type.

Table 9: Desired and Existing Conditions for vegetation cover types for each metric.

| Vegetation Cover Type (VCT) | Total Acres | Fire Type | | | | Fire Hazard Index | | | Total Surface Fuel Loading | | |
|----------------------------------|-------------|------------------------|--------------------|-------------------|----------------|-------------------|-------------------|-------------------|----------------------------|-------------------|------------------|
| | | All Crown Fire | | Active Crown Fire | | Mod- erate | high | Extr eme | Desired (tons / ac) | Meets | Exceeds |
| | | Desired % of VCT | Exist- ing % | Desi- red % | Existi ng % | Exist ing % | Exist ing % | Exis ting % | | Existin g (ac) | Existing (ac) |
| Ponderosa Pine | 642,198 | < 20% | 72% | < 5% | 20% | 11% | 11% | 4% | < 27 | 597,884 | 44,315 |
| Ponderosa Pine Evergreen Oak | 148,332 | < 25% | 82% | < 10% | 29% | 30% | 24% | 4% | < 27 | 132,623 | 15,709 |
| Mixed Conifer – Frequent Fire | 55,723 | < 20% | 75% | < 7 | 50% | 18% | 27% | 24% | < 30 | 40,461 | 12,262 |
| Mixed Conifer – With Aspen | 4,739 | NA | 74% | NA | 70% | 7% | 30% | 34 | NA | NA | NA |
| Aspen | 1,416 | NA | 6% | NA | 5% | 1% | 4% | 3% | NA | NA | NA |
| Pinyon Juniper | 135,062 | NA | 71% | NA | 65% | 33% | 26% | 2% | NA | NA | NA |
| Madrian Pinyon Oak | 23,056 | NA | 85% | NA | 79% | 32% | 42% | 6% | NA | NA | NA |
| Grasslands | 15,946 | < 3% | 15% | < 1% | 2% | 1% | 0% | 0% | NA | NA | NA |
| Riparian Areas | 13,050 | NA | 44% | NA | 17% | 11% | 11% | 4% | NA | NA | NA |

Ponderosa Pine (Montane)

Desired Conditions

Desired conditions for montane ponderosa pine forests include fire regime that have been restored to a sustainable state and is maintained by a combination of planned and unplanned ignitions which regulate landscape structure, pattern, and composition, aligning forest changes with climate changes.

Under current climate conditions, the desired Fire Return Interval would average about 12 years, but with a fair amount of variability (Weaver 1951; Cooper 1960; Moore *et al.* 1999; Fulé *et al.* 2003; Heinlein *et al.* 2005; Diggins *et al.* 2010). The vast majority of acres would burn with low severity surface fire. There would be potential for crown fire on no more than 20% of the montane ponderosa pine (under conditions modeled), with less than 5% being active crown fire. High severity acres would be spatially distributed and rarely occur in patches as large as 50 acres (Cooper 1960; Swetnam and Baison 1996; Roccaforte *et al.* 2008).

In a very general sense, ponderosa pine is a Fire Regime 1, with a fire return interval <35 years, and <25% high severity. A 20-year maintenance Fire Return Interval (almost doubling the historic Fire Return Interval) should be the average maximum, with some variability produced by differences in soils, precipitation, natural ignition frequencies. Fire in montane ponderosa pine forests should be more frequent close to the edge of the Mogollon Rim, because the slightly higher precipitation allows ponderosa pine seedlings to mature at a faster rate and with a higher survival rate (in the absence of fire). Therefore, the maintenance return interval for those areas should be closer to 10, with a 20-year interval being the maximum in the drier areas. A delay of more than 20 years between fires or treatments is likely to result in undesirable fire behavior and

effects.

Existing conditions of ponderosa pine (Montane)

Existing conditions, as modeled under extreme conditions, indicate potential for 72% of this vegetation cover type to burn with crown fire. Of that, 21% would be active crown fire Table 9. About 11,125 acres (2%) of the montane ponderosa pine is in the “very high” category of the Fire Hazard Index, and another 116,820 acres are in the moderate to high category. In those areas, fire effects could produce irreversible detrimental effects when topsoil is burned or eroded, changing site potential for decades.

Ponderosa Pine – Evergreen Oak & Transitional pine (PPEO)

Desired Conditions

Desired conditions for this vegetation type need to be site specific because, in its historic condition, there was potential for high intensity/high severity fire in some capacity. If site-specific information indicates that high severity fire would have been the historic fire potential for a given site, consideration needs to be given to potentially affected values at risk as treatments are set up for implementation. Restoration treatments in this cover type should include reducing the density of trees that have established due to fire exclusion; reintroduction of frequent surface fire, and reducing shrub abundance to favor herbaceous species in understory communities (Huffman *et al.* 2018). There would be an annual fire return interval of about 7 years, with some variability based on individual site evaluation. Some of the crown fire potential indicated by the modeling could, on the ground, be representing patches/inclusions of naturally occurring chaparral or Madrean types for which higher levels of high severity is normal. Fire regimes would be maintained by a combination of planned and unplanned ignitions.

Existing Conditions

Long-term fire suppression in this type, has created conditions where large areas are highly departed from historic conditions and have lost ecological integrity. Typically these changes include in-filling of the canopy gaps, increased density of tree groups; reduced composition, density and vigor of the herbaceous understory plants. Other significant changes resultant from fire exclusion are increased homogeneity of the shrub structural stages on the landscape, facilitating larger patch sizes of high-severity fire effects. Currently, many of these sites are closed-canopy forests, capable of supporting active crown fire (Wahlberg *et al.* 2017 (in draft)) .

The lack of fire has allowed sprouting shrub species to become established underneath ponderosa pine, more so in the Evergreen Shrub Subclass. It is patchy, with areas of mostly chaparral-like vegetation interspersed with areas of ponderosa pine cover. Historically, the patchiness would be maintained by high severity fire in areas where there is less ponderosa pine, and more even-aged stands with low to mixed severity fire where there are ponderosa pine needles to facilitate the more frequent fire. The effects of fire suppression are decreased herbaceous surface cover and diversity, and the associated fire behavior producing increased severity in both the PPEO and the Shrub Subtype. This is conducive to fewer pines and more sprouting shrubs. Most of the Shrub Subclass occurs at the lower elevations of the ponderosa pine, and/or on drier, hotter areas. There are no spatial data available for the inclusions of what could be naturally occurring shrub patches, so these areas were all delineated as PPEO.

Under modeled conditions, there is potential for 69% of the PPEO to support crown fire; 36% of that would be active crown fire (Table 9). Almost 40,000 acres (25%) of the PPEO is classified as being at ‘high’ or ‘greatest’ need for treatment. In these areas, type conversion to a shrub system is a high probability because of the vigorous sprouting response of various shrubs to being top-

killed, and the difficulty of ponderosa seedlings to thrive with that competition.

Dry Mixed Conifer

Desired Conditions

Fire should be allowed to play its natural role, with a fire return interval averaging about 12-15 years with mostly low severity; less than 20% crown fire, with <7% active crown fire. High severity patches would rarely reach 60 acres.

Existing Conditions

On contemporary landscapes, more shade tolerant conifers, such as Douglas-fir, white fir, and blue spruce (*Picea pungens*), tend to increase in cover in late succession, contrary to conditions under the characteristic fire regime. Historically, these species could have achieved dominance in localized settings where aspect, soils, and other factors limited the spread of surface fire, but this would not have been widespread. Much of this type is currently dominated by closed structure and climax species as a result of a disrupted fire regime (Swetnam and Baison 1996; Huffman *et al.* 2015; Rodman *et al.* 2016; Wahlberg *et al.* 2017 (in draft)).

Modeled conditions show that, currently, there is potential for about 37,400 acres (77%) of DMC to burn with crown fire, of which about 26,156 acres (54%) would be active crown fire (Table 9). About 20,000 acres (43%) of the mixed conifer has a ‘high’ or ‘greatest’ need for treatment.

Burn Probability

Because of the varied geography, topography and fuels across the project area, not all portions of the landscape have the same likelihood of burning.

Existing Conditions

By modeling very large numbers of fires across the project area landscape under the full range of fire weather conditions typical throughout the full fire season, we can identify which portions of the landscape are most likely to burn. Utilizing the large fire simulator (FSIM) overall annual burn probability has been calculated for the Rim Country project area. As illustrated in Figure 17, some portions of the project are inherently more likely to burn in a given fire year.

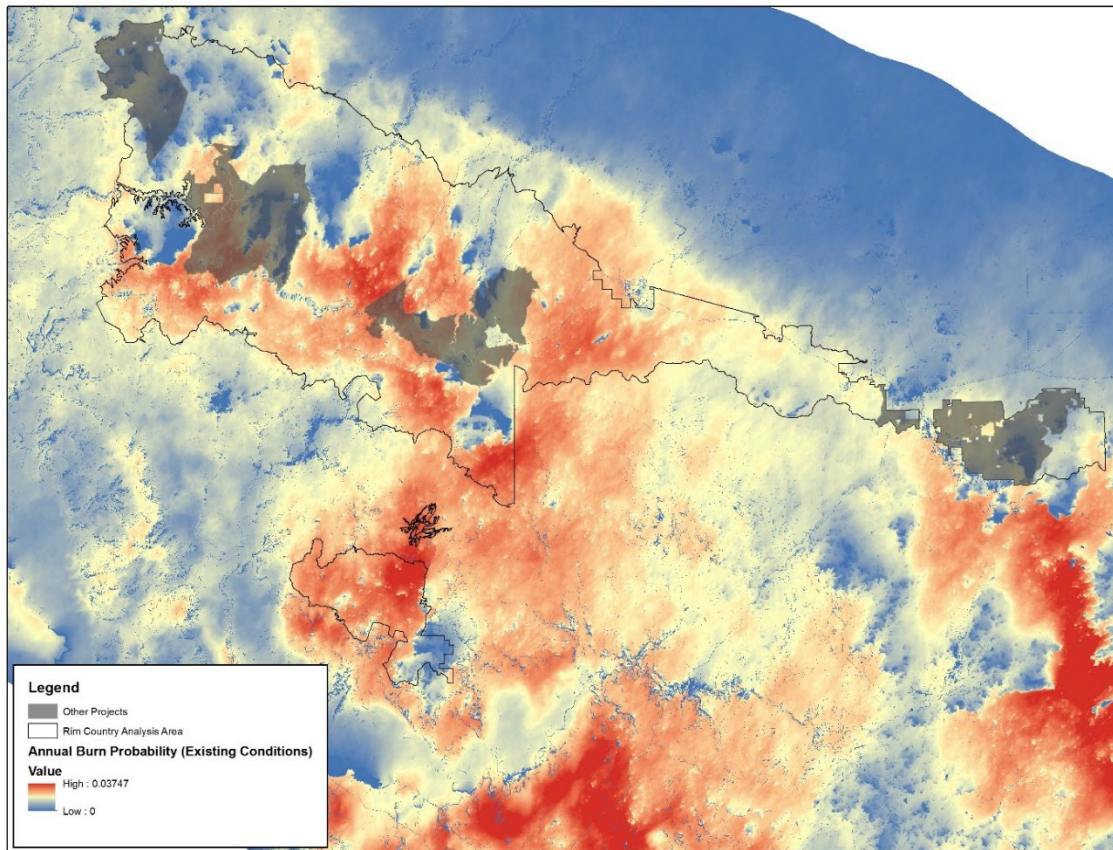


Figure 17. Annual Landscape Burn Probability (existing conditions)

Summary of Alternatives

Alternative 1 – No Action

This is the no action alternative as required by 40 CFR 1502.14(c). There would be no changes in current management and the Land Management Plans would continue to be implemented.

Approximately 611,851 acres of ongoing, current and reasonably foreseeable (next 5 years) of vegetation treatments and 59,815 acres of prescribed fire projects would continue to be implemented adjacent to the treatment area. Alternative 1 is the point of reference for assessing action alternatives 2 and 3.

Alternative 2 – Modified Proposed Action

Alternative 2 proposes a mixture of mechanical and/or prescribed fire treatments on 991,060 acres (77%) of the 1.24-million-acre project area. For more details on alternative 2 proposed

actions see FEIS Chapter 2.

Information on the details of the locations and type of treatments can be found in the Silviculture report.

Alternative 3 – Focused Alternative

For more details on alternative 3 proposed actions see FEIS Chapter 2. Information on the details of the locations and type of treatments can be found in the Silviculture Specialist report.

Alternatives Considered but not Analyzed in Detail

Strategic Treatments for Fire Use Alternative (Strategic Treatments Alternative)

While not ultimately considered in the same detail as the other alternatives outlined in this report, consideration was given to the development of the Strategic Treatments Alternative. This alternative proposed three tiers of management, with different management strategies applied to each alternative.

Tier 1 – Community Protection: represent the highest priority for treatment and constitute the area within ½ mile of homes and critical infrastructure.

Tier 2 – Strategic Thinning Treatment: selected through an optimization analysis, these areas would be the second level of priority for mechanical treatments utilizing the Flexible Toolbox Approach (now known as the condition-based management approach). The identification of these treatment locations would follow an optimization process to leverage proposed treatments to alter landscape scale fire behavior.

Tier 3 – Fire Use: these areas would not receive mechanical treatment but would instead use both management and natural ignitions at frequencies commensurate with natural fire regimes to achieve resource benefits.

Spatial Optimization modeling was performed to identify areas of the Rim Country landscape best suited for each of the above tiers of management. cursory analysis indicated that this alternative would have met the project purpose and need from a fire ecology perspective, and would likely have made considerable contributions toward stated desired conditions. Because this alternative was ultimately dropped from detailed consideration, full accounting of its direct and indirect effects are not included in this report. However, it is assumed that the effects would likely fall in between those described for the two action alternatives. A further discussion of the optimization process used in the initial evaluation of this alternative is included in Appendix F to this report.

Environmental Consequences

Throughout this section, changes directly attributable to proposed actions, such as thinning or prescribed fire, are direct effects. These include changes to shading, canopy continuity, canopy base height, consumption of surface fuel, etc. Changes to the potential behavior and effects of future wildfires that result from the direct effects are considered indirect effects. Effects of proposed actions for stream restoration and roads are discussed separately from those of thinning and prescribed fire.

Alternative 1 – No Action

Under Alternative 1, there would be no changes to current management. Alternative 1 would not meet the purpose and need of this project because most of the ecosystems and natural resources within the treatment area would continue to degrade. The treatment area would not move towards desired conditions. This alternative would not reduce the risk to human lives, nor would it result in safe, cost-effective fire management that would protect, maintain, and enhance National Forest System lands, adjacent lands, and lands protected by the Forest Service under cooperative agreements. As required by FSM 5100 (page 9).

This Alternative would not meet direction in Forest Service Manual 5100 (page 9), which includes direction on USFS use of prescribed fire to meet land and resource management goals and objectives. The objectives of fire management on lands managed by the USFS are:

1. Forest Service fire management activities shall always put human life as the single, overriding priority. This Alternative would not fully support incorporation of the highest standards for firefighter and public safety and would not be expected to improve and enhance the safety of the public as it relates to wildland fire.
2. Forest Service fire management activities should result in safe, cost-effective fire management programs that protect, maintain, and enhance National Forest System lands, adjacent lands, and lands protected by the Forest Service under cooperative agreement. This Alternative would not achieve restoration in project area. Under this Alternative fire, when it occurs, would be detrimental to the ecosystems in which it burns as well as areas outside of the burned area. Wildfire in untreated areas is more costly and less efficient to manage in untreated areas than prescribed fire, or wildfire that is managed in areas that have had restoration treatments.

Direct and Indirect Effects

Effects resulting from Alternative 1 are indirect because there would be no new management actions. The effects of implementing Alternative 1 are discussed as follows:

1. Rim Country Project Area and Watershed analysis of measures and metrics
2. Values, Resources and Assets analysis of measures and metrics
 - a. Wildfire Management
 - b. WUI
 - c. Vegetation Cover Types
 - d. Old Growth Trees
 - e. Air Quality

This alternative would not meet the purpose and need of Rim Country. Under Alternative 1, all three Land Management Plans would continue to be implemented, but there would be no decrease in undesirable fire behavior and effects, except that resulting from wildfires or other natural disturbances. The direct and indirect effects of Alternative 1 relate to the effects of the continued degradation of surface and canopy fuel conditions, and the effects of the continued interruption of the natural fire regimes. These include the potential for the direct effects of large, high-severity wildfires occurring within the project area. The indirect effects of such burns could also compromise water resources due to post-fire flooding and debris flows. Indirect effects could also include impacts to air quality downwind and downslope of fires. The most likely impacts to air quality being locations northeast of the project area, and in low areas, such as the Verde Valley,

Snowflake, and Show Low.

Rim Country Project Area Metrics and Measures

The Alternative 1 modeled percent active crown fire, percent in the moderate to extreme Fire Hazard Index and the mean surface fuel loadings for each 6th code HUC in the project area are presented in Table 10. Values presented represent percentages of USFS land within each watershed, within the project area.

Table 10: Alternative 1 HUC 6 watershed metrics.

| Map Label | Watershed ID | Watershed Name | % Active Crown Fire | % Moderate - Extreme FHI |
|-----------|--------------|--|---------------------|--------------------------|
| 1 | 150200000000 | Upper Brown Creek | 23% | 25% |
| 3 | 150200000000 | Mortensen Wash | 12% | 12% |
| 4 | 150200000000 | Barbershop Canyon | 56% | 73% |
| 5 | 150200000000 | Leonard Canyon | 49% | 59% |
| 6 | 150200000000 | Gentry Canyon | 50% | 68% |
| 7 | 150200000000 | Reynolds Creek | 68% | 82% |
| 8 | 150200000000 | Double Cabin Park-Jacks Canyon | 13% | 13% |
| 9 | 150200000000 | East Verde River Headwaters | 30% | 49% |
| 10 | 150200000000 | Webber Creek | 40% | 62% |
| 11 | 150200000000 | Sepulveda Creek | 24% | 27% |
| 12 | 150200000000 | Cabin Draw | 35% | 36% |
| 13 | 150200000000 | Upper Chevelon Canyon-Chevelon Canyon Lake | 34% | 42% |
| 14 | 150200000000 | Bear Canyon-Black Canyon | 19% | 22% |
| 15 | 150200000000 | Bull Flat Canyon | 6% | 10% |
| 16 | 150200000000 | Red Tank Draw | 22% | 23% |
| 17 | 150200000000 | Upper Willow Valley | 11% | 11% |
| 18 | 150200000000 | Home Tank Draw | 37% | 33% |
| 19 | 150200000000 | Pine Creek | 46% | 64% |
| 20 | 150200000000 | Linden Draw | 16% | 16% |
| 21 | 150601000000 | West Fork Cottonwood Wash-Cottonwood Wash | 6% | 6% |
| 22 | 150601000000 | Upper Day Wash | 7% | 7% |
| 23 | 150200000000 | Upper Willow Creek | 48% | 55% |
| 24 | 150200000000 | Middle Wildcat Canyon | 25% | 27% |
| 25 | 150200000000 | Lower Wildcat Canyon | 43% | 42% |
| 26 | 150200000000 | Upper Potato Wash | 40% | 39% |
| 27 | 150200000000 | Christopher Creek | 46% | 62% |
| 28 | 150200000000 | Lower Willow Valley | 12% | 13% |
| 29 | 150200000000 | Upper West Clear Creek | 45% | 47% |
| 30 | 150200000000 | Hardscrabble Creek | 33% | 51% |
| 32 | 150200000000 | Dodson Wash | 32% | 31% |

| Map Label | Watershed ID | Watershed Name | % Active Crown Fire | % Moderate - Extreme FHI |
|------------------|---------------------|--|----------------------------|---------------------------------|
| 33 | 150200000000 | Long Tom Canyon-Chevelon Canyon | 43% | 50% |
| 34 | 150200000000 | Upper West Chevelon Canyon | 39% | 48% |
| 35 | 150200000000 | Parallel Canyon-Cherry Creek | 33% | 50% |
| 36 | 150200000000 | Rock Creek | 22% | 52% |
| 37 | 150200000000 | Clover Creek | 52% | 56% |
| 38 | 150200000000 | Ellison Creek | 24% | 42% |
| 42 | 150200000000 | Wilkins Canyon | 42% | 46% |
| 43 | 150200000000 | Lower Willow Creek | 47% | 47% |
| 44 | 150200000000 | Upper Pierce Wash | 14% | 13% |
| 45 | 150200000000 | Upper Brookbank Canyon | 28% | 29% |
| 46 | 150200000000 | Gruwell Canyon-Cherry Creek | 38% | 61% |
| 47 | 150200000000 | Workman Creek | 51% | 69% |
| 48 | 150200000000 | Buzzard Roost Canyon | 47% | 72% |
| 49 | 150200000000 | Gordon Canyon | 47% | 67% |
| 50 | 150200000000 | Upper Fossil Creek | 32% | 39% |
| 51 | 150200000000 | Windmill Draw-Jacks Canyon | 18% | 19% |
| 54 | 150200000000 | Upper Wildcat Canyon | 36% | 38% |
| 55 | 150200000000 | Alder Canyon | 36% | 40% |
| 56 | 150200000000 | Durfee Draw-Chevelon Canyon | 68% | 63% |
| 57 | 150601000000 | Buckskin Wash | 6% | 6% |
| 58 | 150200000000 | Upper Salome Creek | 51% | 73% |
| 59 | 150200000000 | Upper Spring Creek | 55% | 78% |
| 60 | 150200000000 | Horton Creek-Tonto Creek | 37% | 53% |
| 61 | 150601000000 | Brady Canyon | 6% | 6% |
| 62 | 150200000000 | Tremaine Lake | 8% | 7% |
| 63 | 150200000000 | Dogie Tank-Jacks Canyon | 13% | 16% |
| 64 | 150601000000 | Bagnal Draw-Show Low Creek | 5% | 5% |
| 65 | 150200000000 | Stinson Wash | 10% | 11% |
| 66 | 150200000000 | Upper Phoenix Park Wash | 14% | 14% |
| 68 | 150200000000 | Lower West Chevelon Canyon | 44% | 39% |
| 69 | 150200000000 | Bull Tank Canyon-Tonto Creek | 44% | 65% |
| 70 | 150200000000 | Toms Creek | 51% | 56% |
| 73 | 150200000000 | Decker Wash | 12% | 10% |
| 74 | 150200000000 | Gentry Canyon | 61% | 71% |
| 75 | 150200000000 | East Clear Creek-Clear Creek | 39% | 44% |
| 76 | 150200000000 | Woods Canyon and Willow Springs Canyon | 29% | 30% |
| 77 | 150200000000 | West Fork Black Canyon | 9% | 16% |
| 78 | 150200000000 | Canyon Creek Headwaters | 7% | 14% |
| 79 | 150200000000 | Haigler Creek | 52% | 72% |

| Map Label | Watershed ID | Watershed Name | % Active Crown Fire | % Moderate - Extreme FHI |
|-----------|--------------|------------------|---------------------|--------------------------|
| 80 | 150200000000 | Long Valley Draw | 33% | 33% |

Fire Type

Fires that do occur in the project area would be wildfires; some of which could be beneficial, and some could be catastrophic or detrimental, depending on environmental conditions at the time of the fire, and the condition of the forests at the time they burn. If historic patterns of burn severity were to continue, approximately 73% of the area burned in wildfires larger than 1,000 acres would burn with low severity effects that could be beneficial. However, given extreme weather conditions, there would be an increased potential for crown fire compared to the existing conditions. All crown fire types (active, passive or conditional) can be expected across approximately 79% of the project area under extreme weather conditions (Figure 18), up from 73% in the existing conditions. Approximately 32% of the projected area has the potential to burn with active or conditional crown fire, up slightly from 30% in the existing conditions.

Post wildfire watershed effects increase with the percentage of the watershed that burns at moderate to high severity (Cannon, 201; Neary 2011). Under Alternative 1, 40 watersheds are expected to burn with active crown fire under extreme weather conditions for over 30%² of the watershed, resulting in high severity effects (Figure 19). Eleven watersheds have over 50% of the watershed expected to burn with active crown fire. Watersheds 56 (Durfee Draw-Chevelon Canyon) and 7 (Reynolds Creek) have the highest proportion of potential for active crown fire (68% for both). If a large wildfire were to burn within these watersheds under extreme fire weather conditions, detrimental post wildfire effects would be expected.

Fire Hazard Index

The expected short term (< 20 years) effects of Alternative 1 would include an increased risk of undesirable wildfire behavior and effects. Wildfire behavior and effects could threaten lives, resources, and infrastructure. 39% of the project area is within the moderate to extreme FHI, which presents difficult and dangerous suppression conditions during a wildfire and potential for adverse post fire effects on soils and surface water quality, up from 36% in the existing conditions (Figure 20).

There are 24 watersheds with over 50% of the watershed in the moderate to very high FHI categories (Figure 21). Watershed 7 (Reynolds Creek, 80%) and 107 (Upper Spring Creek, 77%) have the highest proportion of FHI in the moderate to very high class. Large wildfires in these watersheds have a high potential to be difficult and dangerous to suppress, and have a high potential for adverse post fire effects.

² Percentage values are based on USFS lands only within a given watershed.

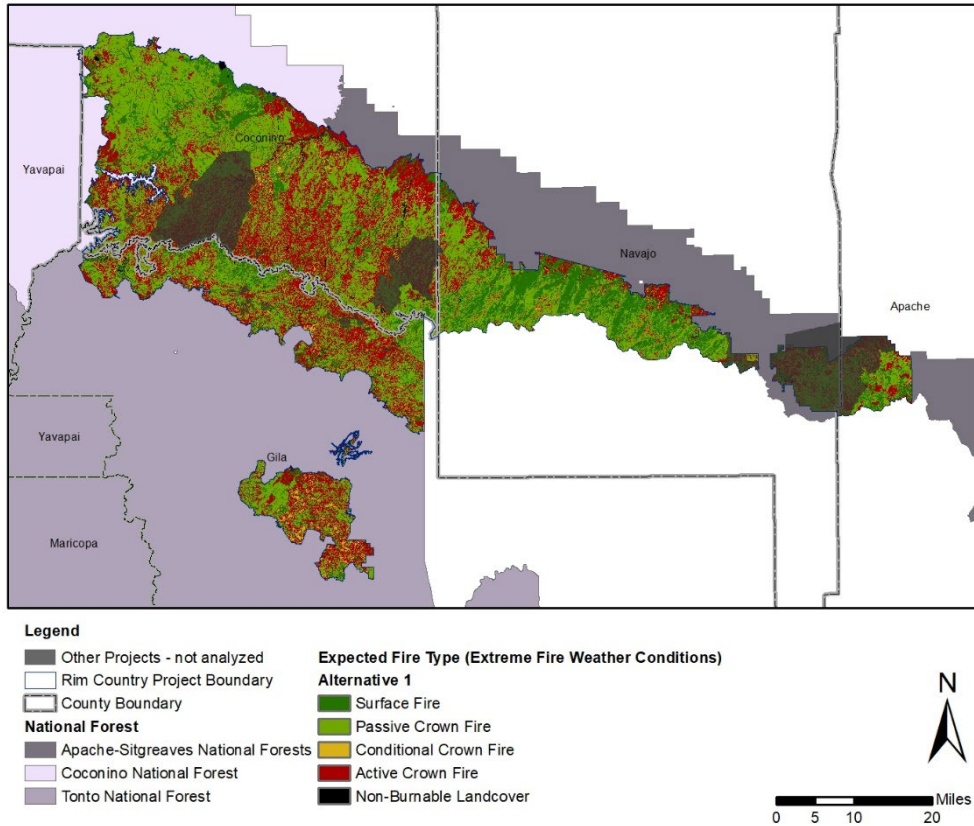


Figure 18: Expected Fire Type for Alternative 1, under modeled weather conditions.

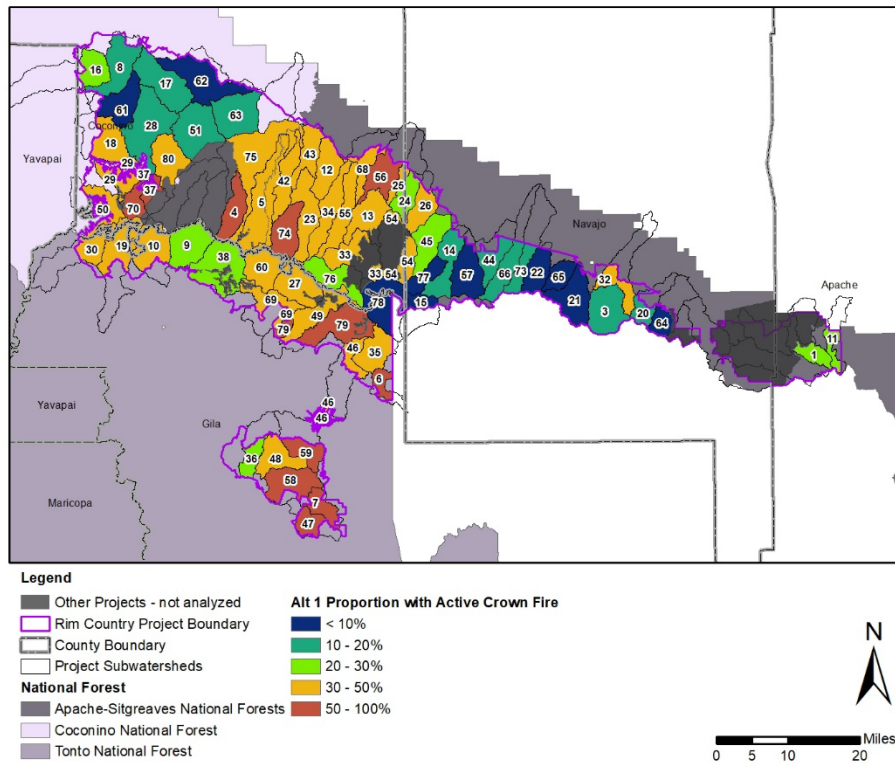


Figure 19: Alternative 1 Proportion of HUC6 watersheds with expected Active Crown Fire, under modeled weather conditions.

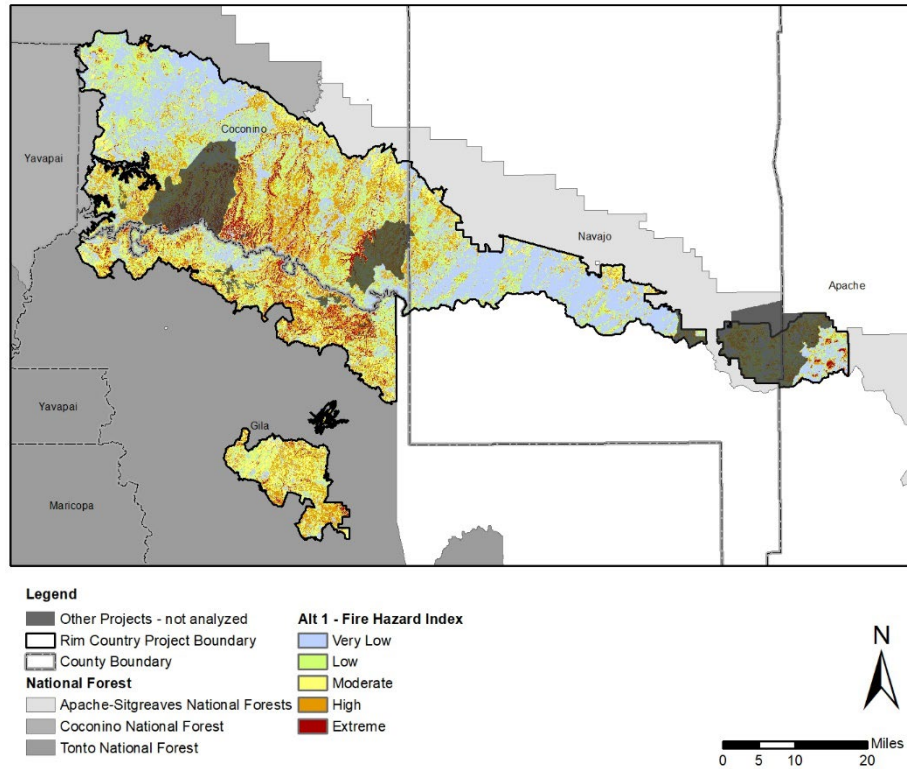


Figure 20: Fire hazard Index for Alternative 1, under modeled fire weather

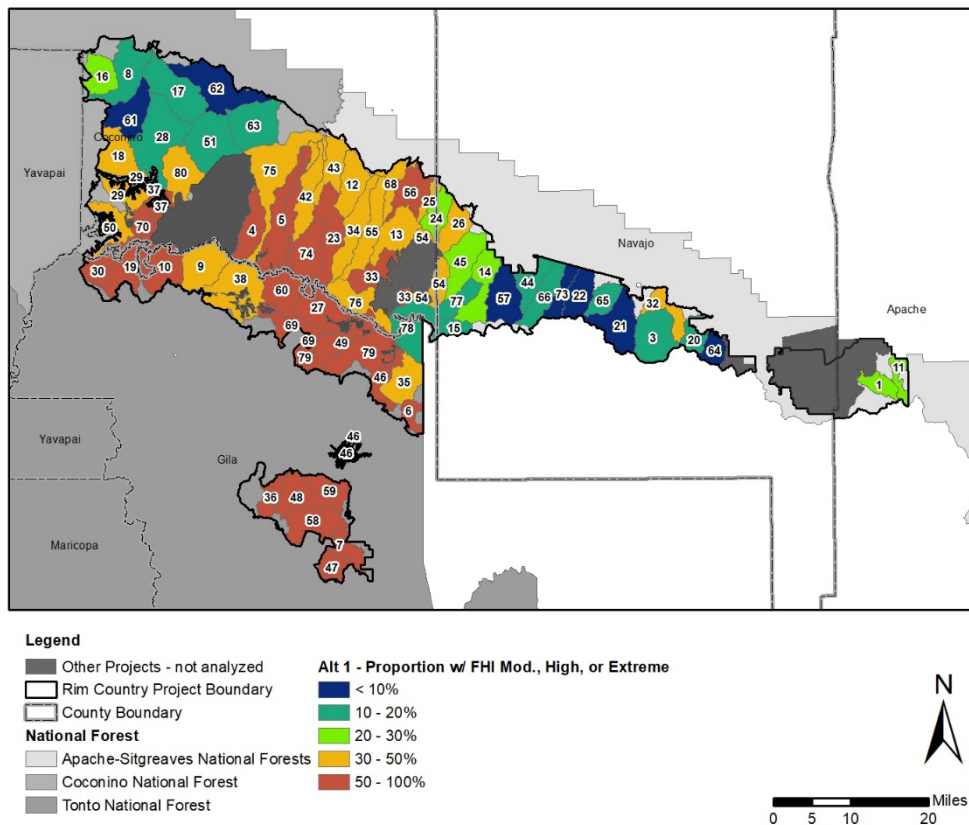


Figure 21: Proportion of each HUC6 watershed with FHI in the moderate, high or very high category for Alternative 1, under modeled fire weather

Surface Fuels loadings

Under the No Action Alternative, surface fuel loading would continue to accumulate. This would lead to high burn severity (fire effects to soil) as residence time increases with increasing surface fuel loading. Coarse Woody Debris (dead/down woody fuels greater than 3” in diameter) could be expected to switch from predominantly sound to predominantly rotten debris after about 15 years with no fire, with the highest CWD loading expected from 6 – 12 years after the last fire (Roccaforte *et al.* 2012). Desired conditions for total surface fuel loadings are less than 27 tons/ac in Ponderosa Pine vegetation types and less than 30 tons/ac in Dry Mixed Conifer. Under Alternative 1, 121,021 acres exceed recommended levels, up from 72,285 acres in existing conditions. 101,594 acres of Ponderosa Pine and 19,427 acres of Dry Mixed Conifer vegetation types exceed recommended fuel loadings (Figure 22).

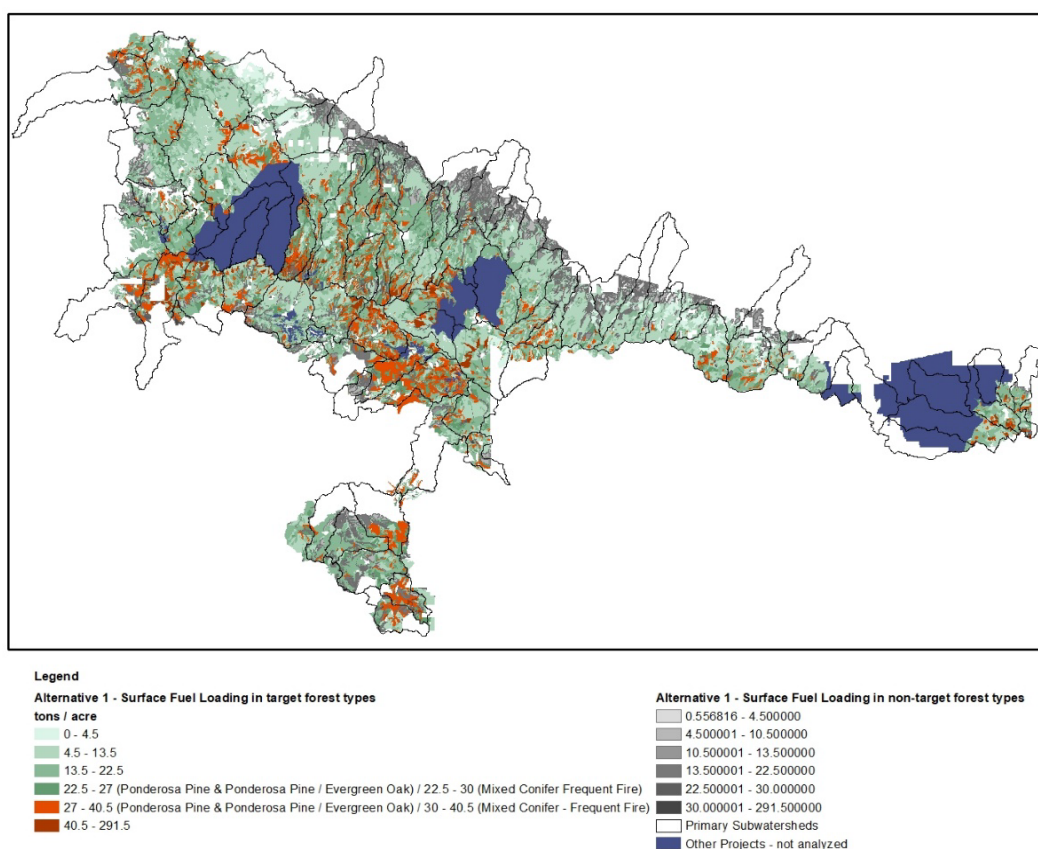


Figure 22: Surface Fuel Loads for Alternative 1, under modeled fire weather

Wildfire Management

Wildfire management environment would become increasingly complex as both CFA and FHI increase. Under extreme fire weather, suppression tactics would continue to be non-effective and dangerous.

WUI

Under the No Action Alternative, WUI areas across the treatment area would be threatened by the increasing extent of high severity of wildfires (Table 11). CFA and FHI are both expected to increase. The potential for home and asset loss from crown fires, high intensity surface fires and ember lofting would continue to increase.

Table 11: WUI Measures and Metrics for Alternative 1

| Alternative 1 | | Fire Hazard Index | | | | Fire Type | |
|-------------------------------|-------------|-------------------|----------|------|-----------|-----------------------------|-------------------|
| WUI Class | Total Acres | Very Low - Low | Moderate | High | Very High | Passive & Active Crown Fire | Active Crown Fire |
| Communication Sites | 13,333 | 64% | 14% | 19% | 3% | 81% | 28% |
| FS Buildings & Rec Residences | 10,548 | 60% | 11% | 23% | 6% | 83% | 33% |
| High Value Rec Sites | 5,581 | 61% | 9% | 22% | 8% | 85% | 33% |
| Non-FS Land with Structures | 144,691 | 63% | 16% | 18% | 3% | 75% | 29% |
| Transmission Lines | 28,885 | 63% | 15% | 17% | 4% | 74% | 32% |

Vegetation Cover Types

In the long term (>20 years), tens of thousands of acres (the actual amount would be a subset of the 334,800 acres in the treatment area that would likely burn with high severity effects) would potentially be converted to non-forested systems as a result of high severity fire. Aspen stands would continue to decline, and some stands would be likely to disappear. Woody species continue to encroach into grasslands and shrublands, and sprouting shrubby species would increasingly occupy understories in Ponderosa Pine Evergreen Oak. Table 12 shows the metrics for each vegetation cover type.

Table 12: Vegetation Cover Type Measures and Metrics for Alternative 1

| ERU | Total Acres | Fire Hazard Index | | | | Fire Type | |
|-------------------------------|-------------|-------------------|----------|------|-----------|----------------|-------------------|
| | | Very Low - Low | moderate | high | very high | All Crown Fire | Active Crown Fire |
| Ponderosa Pine | 642,198 | 75% | 7% | 16% | 2% | 82% | 22% |
| PIPO Evergreen Oak | 147989 | 36% | 33% | 26% | 5% | 85% | 30% |
| Mixed Conifer – Frequent Fire | 49281 | 26% | 18% | 29% | 27% | 77% | 54% |
| Mixed Conifer with Aspen | 3130 | 24% | 7% | 32% | 37% | 77% | 74% |
| Aspen | 1438 | 91% | 1% | 5% | 3% | 6% | 5% |
| Pinyon Juniper | 135085 | 37% | 32% | 28% | 3% | 71% | 67% |
| Madrean Pinyon Oak | 23318 | 19% | 33% | 41% | 7% | 86% | 80% |
| Grasslands | 18851 | 98% | 1% | 0% | 0% | 16% | 2% |
| Riparian Areas | 14567 | 71% | 11% | 13% | 5% | 49% | 19% |

Large Trees

Under the No Action Alternative, large trees across the treatment area would be threatened by the increasing extent of high severity of wildfires (Swetnam 1990a; Covington and Moore 1994; Swetnam and Betancourt 1998; Westerling *et al.* 2016). In areas where a wildfire would be a first entry burn and there had been no prescribed fire or thinning, there would be a much greater potential for mortality than in previously treated areas. In this alternative, many large trees would be killed or damaged by wildfire, as well as those trees that die or decline slowly from the cumulative effects of fire and other stressors (Minard 2002).

Unavoidable Adverse Effects, Irreversible and Irretrievable Commitment of Resources

As described above, with no treatment, high severity fire effects would become more widespread, and extreme fire behavior would become more common. In recent years, fires on the Mogollon Rim have taken human lives, destroyed homes/property/infrastructure, and produced high severity effects across large areas not adapted to high severity fire including Rodeo/Chediski 2002 (469,000 acres), Wallow 2011 (538,000 acres), and Whitewater 2012 (~297,000 acres). There is broad consensus that such fires will continue to burn in this area if no action taken, though the specific extent and location of the negative effects could not be known until an incident occurs. First order effects would include (but are not limited to): chemical and physical changes to soil, high levels of mortality across ~27% or more of the burned area (assuming ~27% high severity), consumption and/or killing of the seed bank, consumption of organic material in soil, including flora and fauna, conversion of forested habitat to non-forested habitat. Second order fire effects would include (but are not limited to) erosion, flooding, debris flows, destroyed infrastructure, changes in visitation to the forest and the economies of local businesses that depend on visitors and natural resources, and degradation of water resources for wildlife, livestock, and humans. Some of these effects would last just a few days or weeks, some would take much longer. For example, topsoil is critical to healthy surface vegetation and would take centuries to recover though, with climate change, it is unknown exactly what the ecological trajectory would be. The loss of old growth and old trees would require decades to centuries to recover.

Effects Common to All Action Alternatives

Activities that will effect fire and fuels include mechanical treatments and/or prescribed fire. While the number of acres of prescribed fire and mechanical treatments varies by Alternative, their effects, were implemented, will be the same.

Mechanical treatment alone has the potential to alter fire behavior primarily through a reduction of CBD, but can also increase surface fuel loadings through the placement of slash on the ground (Carey and Schuman, 2003). Carey and Schumann (2003) further note that the use of mechanical thinning alone has a varied effect on modifying fire behavior, primarily because of the created slash. All of the thinning treatments proposed within this analysis are paired with prescribed burning, therefore, the effects will be a combination of thinning and burning. Various researchers have concluded that the combination of thinning and burning as the most effective way to alter fire behavior (Strom 2005; Graham *et al.* 2004; Peterson *et al.* 2005; Cram *et al.* 2006).

The effectiveness of using prescribed fire as a tool, alone or combined with mechanical treatment, to restore ponderosa pine to a healthier, more sustainable and resilient condition is well documented (Fulé *et al.* 2001b, Roccaforte *et al.* 2008, Strom and Fulé 2007, Fulé *et al.* 2012).

Prescribed fire is used as a proxy for wildfires which allows for more control over where and when fire burns and often leads to lower overall severity and emissions.

Most of the effects of the natural role of fire could not be effectively replicated by means other than fire. These effects include nutrient recycling; seed scarification (by both heat and smoke); promotion of a mosaic of seedlings, shrubs, forbs, and grasses; regulating surface fuel loads, changes in soil moisture, changes to albedo, etc. (Laughlin *et al.* 2008; Pyke *et al.* 2010; Laughlin *et al.* 2011). Over time, prudent use of prescribed burning, particularly when combined with mechanical thinning, would reduce the potential for damage from wildfires, as well as the costs associated with fire suppression (Jaworski 2014). Fire increases structural heterogeneity and diversity and promotes natural regeneration of ponderosa pine, providing favorable seedbeds and enhancing the growing environment for survival (Harrington and Sackett 1992).

The proposed treatments would create a mosaic of interspaces and groups (of ponderosa pine) of various sizes that would be maintained with fire. This mosaic is also a mosaic of crown fire potential, with some groups having potential for crown fire under some circumstances, with the surrounding interspaces causing crown fire to transition back to surface fire.

Post-treatment conditions for the action alternatives would include openings that would be managed to promote regeneration. Prescribed fire would be an important tool for creating receptive seedbeds for successful regeneration by consuming surface fuels, creating bare, mineral soil, allowing seeds better contact with soil. As seedlings and small saplings mature, fire and competition would thin trees, maintaining the desired trajectory for a fire-adapted landscape, so that an appropriate number of seedlings survive to maintain healthy forest conditions.

The longevity of the effects of a prescribed fire depends on the specific effect being evaluated; the condition of the burned area before a burn; the conditions under which it burned, and post-treatment conditions (such as precipitation). For example, a denser forest will accumulate litter faster than a more open forest; soil conditions and moisture affect the rate of decay; the germination and survival of seedlings depends on cone production and environmental conditions for the first 2-3 years.

In the long term, fire would help maintain a shifting, sustainable, resilient mosaic of groups, interspaces, and openings. Without regeneration openings, even with fire, the space occupied by incoming regeneration would begin to fill in the interspaces and, in the long run, as the seedlings mature, it would increase horizontal and vertical canopy continuity so that, if crown fire did initiate, there would be potential for larger areas of high severity effects.

Prescribed fires would be implemented, which may include pile burning months in advance of broadcast burns. Ideally, prescribed fires would occur on an average of every 10 years, depending on yearly fluctuations in climate/weather at different locations within the treatment area. Some areas will have had prescribed fire or wildfire within the last 10 – 15 years, so prescribed fires that are implemented would be maintenance burns (see below). Limitations (wildlife concerns, smoke, funding, resource availability, etc.) may make it difficult to attain an average of a 10-year fire return interval across the proposed treatment area. Burning some areas on a slightly longer return interval may be warranted to reduce smoke in sensitive receptors as mitigation for prescribed fires.

First entry burns are those burns which are the first-time fire occurs in an area that has missed several fire cycles. In ponderosa pine and other Fire Regime 1 ecosystems, first entry burns:

-
- Consume or lethally scorch needles/scales/leaves on the lower branches of trees and shrubs, effectively raising the Canopy Base Height, decreasing Canopy Bulk Density, and decreasing the likelihood of crown fire initiation (direct effects) (Keyes and O'Hara 2002). May include burning activity fuels resulting from thinning.
 - Consume/reduce a large portion of surface fuels, with the amount of dead/down woody fuels less than 3 inches in diameter consumed depending primarily on fuel moisture and environmental conditions at the time of the burn) (direct effects).
 - Are likely to decrease rotten coarse woody debris and increase sound coarse woody debris in the short term (2-4 years) as some shrubs, branches, or small trees are killed (Waltz *et al.* 2003) (direct and indirect effects).
 - Thin out some small trees, particularly seedlings, maintaining a mosaic of groups and interspaces (direct effects). Those that survive are healthier because of reduced competition for resources, a flush of post-burn nutrients and their lower branches/fuels are removed, making them more resistant to future fires.

Objectives in a first entry burn are usually related to consumption of accumulated surface fuels, raising canopy base height, decreasing canopy bulk density, and some group or single tree torching to reduce canopy closure (direct effects). When these are the primary objectives, there are much broader conditions under which the area could burn and meet objectives than with maintenance burns, when seasonality is more important to maintain the diversity of understory species (Westlind and Kerns 2017). In areas where fire has been excluded for many decades, a single prescribed fire is inadequate to reduce fuels (Lynch *et al.* 2000).

Second entry burns are those burns which occur within a few years of a first entry burn. For second entry burns, fuel loads would be significantly lower than in first entry burns, producing much less smoke and with lower potential for high severity fire. A second entry burn should occur after surface fuels have recovered sufficiently to produce fire behavior sufficient to meet burn objectives.

Objectives of second entry burns are likely to relate to reducing the fuel loading as it has been augmented by the effects of the first entry burn. If a branch is alive following a burn, it will drop the scorched needles sooner; if the branch itself has been killed, the needles tend to be retained until removed by weathering (Ryan 1982). Scorched and blackened needles usually drop from the crown within one year of the fire. For a second entry burn, dead wood from seedlings and shrubs top-killed in the first entry burn are part of the fuel load. Dead needles from the lower branches have fallen to the ground and are now part of the surface fuel load.

Maintenance burns in ponderosa pine generally begin with the 2nd or 3rd burn in an area that is being restored. This could apply in areas within the treatment area that have burned from wildfire or prescribed fire within the last 10 – 15 years. Maintenance burns occur when ecosystem conditions are such that fire can play its historic role on the ecosystem, as a disturbance that establishes site-specific and landscape scale patterns, regulates flora and fauna, etc. In ponderosa pine, these burns produce low severity effects, fewer emissions, and are able to be conducted with fewer resources. The timing of maintenance burns should mimic the natural seasonality of fire as closely as possible. For those areas which have had two or more fires (wildfire or prescribed fire) in the last twenty years, prescribed fires would be true maintenance burns, with minimal emissions (Robinson 2004), and only 'maintenance' needed from the fire.

For many acres of the treatment area, prescribed fires would be maintenance burning and, from an ecological perspective, should occur in the summer months if possible (Fulé *et al.* 2007).

Direct and Indirect Effects

In the short term (<20 years), *where treatments are implemented*, the potential for undesirable fire behavior and effects would be reduced by breaking up the vertical and horizontal continuity of canopy fuels, decreasing excessive surface fuel loads of litter and duff (direct effects). It would be expected that the growth of light, flashy fuels would be stimulated by post-treatment conditions (second order effects). Wildfire behavior would benefit the ecosystems in which it burned, and would not threaten lives, resources, or infrastructure, except where they are adjacent to, or near areas (such as MSO habitat or Wet Mixed Conifer) that were not treated as intensively as the rest of the treatment area at this time. Air quality impacts (indirect effects) could increase some as prescribed fires are implemented. During the implementation period, portions of the landscape will remain at risk for undesirable fire effects and unmanaged wildfire will likely contribute to these outcomes.

In the long term (>20 years), potential for undesirable fire behavior, as assessed by changes to surface and canopy fuels, would remain lower than existing condition for about 37% of the Rim Country area proposed for treatment. Potential for undesirable fire effects, as assessed by changes to canopy and surface fuels, would remain lower than existing condition for about 31% of the ponderosa pine in the treatment area. Improvements achieved through treatments will eventually dissipate without repeated and recurring fire (including both managed and unmanaged ignitions). Fire serves as a critical ecological driver in this landscape and unless maintenance burning continues in perpetuity, fire deficit will contribute to long term ecological instability. Impacts to air quality as a result of fire related pollutants emitted as a result of prescribed fire could decrease some as the majority of the treatment area would be in maintenance burn mode, producing fewer emissions per acre. However, since there would be more acres burned, the number of days of air quality impacts could increase.

Thinning, whether or not slash was removed from the site, would give managers more control of the amount and timing of emissions. As thinning and first-entry burns were completed, burn windows would expand for larger areas so more burning could occur when ventilation was good. Fewer and healthier trees, as a result of thinning and would be more fire resistant, and understory and surface vegetation would become established. With lower surface fuel loading, and canopy fuels adapted to fire, burn windows would be broader than for initial entry burns. Decision space for managing unplanned ignitions would expand as Rim Country (and other projects) are implemented.

Fire Type

Decreasing the horizontal and vertical continuity of canopy fuels is a direct effect of the proposed treatments that would allow sunlight to reach the surface, increasing surface temperatures, and decreasing dead fuel moisture content at the surface. This, combined with increased surface winds with fewer trees blocking the wind, could increase surface fire intensity, flame length, and rate of spread even if surface fuels were the same before and after thinning (Omi and Martinson 2004, Scott 2003). Therefore, canopy fuel treatments reduce the potential for crown fire (indirect effect) at the expense of slightly increased surface fire behavior (fireline intensity, flame length, and rate of spread). However, critical levels of fire behavior (limits of manual or mechanical control) are less likely to be reached in stands treated to withstand crown fires, as all crown fires are uncontrollable. Although surface intensity may be increased after treatment, a fire that remains on the surface beneath a timber stand is generally more controllable (Scott 2003). After the first prescribed fire, surface fuels would be lower so, even with the changes described above, the potential fire behavior and effects would be improved following the treatments under

Alternatives 2 & 3.

Fire Hazard Index

Some components of the Fire Hazard Index are fixed and not susceptible to changes due to proposed treatments. These components include slope and soil erodibility. While these components are necessary for determining potential fire behavior and/or post fire effects, treatments will not result in changes to these components. The rest of the components, which relate more directly to fire behavior, will be influenced by proposed treatments in ways consistent with those discussed above in the Fire Type section and below in the Surface Fuels section. Maximum reductions in FHI will be achieved following the second re-entry prescribed fire. Following this, FHI may begin to increase unless continued maintenance burning occurs in perpetuity.

Surface fuels

Mechanical thinning alone can contribute significantly to decreasing the potential for crown fire by breaking up vertical and horizontal canopy fuel continuity, but does little, in the long run, to decrease surface fuel loading. Initial thinning impacts may include temporary fire ‘breaks’ where there are skid trails, or other surface disturbances, but surface fuels that are not removed from the treatment area remain a potential source of heat and smoke emissions. Effects may be spottier but, where fuels have been pushed into piles or furrows (intentionally or otherwise), they may smolder for days or weeks. Mechanical thinning often increases surface fuel loading by small amounts (Fulé *et al.* 2012).

Litter, Duff, and woody fuels greater than 3” diameter contribute more than other fuels to emissions. High surface fuel loading can cause high severity effects, both direct and indirect, to soils, and surface biota (such as roots, seeds, forbs, and other species adapted to low severity fire) (Lata 2006, Neary *et al.* 2005, Valette *et al.* 1994), as well as producing air quality impacts. Mechanical thinning alone can contribute significantly to decreasing the potential for crown fire by breaking up vertical and horizontal canopy fuel continuity, but does not decrease surface fuel loading (Fulé *et al.* 2012). Initial thinning impacts may include temporary fire ‘breaks’ where there are skid trails, or other surface disturbance, but surface fuels are generally not removed from the treatment area, and remain a potential source of heat and emissions. Surface effects may be spottier following thinning because residual fuels often include jackpots or small piles. Where fuels have been pushed into piles or furrows, by design or happenstance, they may smolder for a long time.

A direct effect of prescribed fires would be the consumption of some CWD. Prescribed burning would produce new accumulations of CWD although an indirect effect of the burning would be the CWD it may be of a different stage of decay that does not fill the same ecological niche. (Waltz *et al.* 2003, Haase and Sackett 2008, Roccaforte *et al.* 2012). Surface fuel loading can be managed with fire and felling techniques to increase or decrease woody debris in different size classes. A direct effect of Alternatives 2 and 3 could be that some areas would be deficit in CWD for a few years following treatment but, given the trend shown, it would only be a few years before it met desired conditions again and, with maintenance burning, it should be possible to maintain desired levels.

CWD could be expected to switch from predominantly sound to predominantly rotten debris after about 15 years with no fire, with the highest CWD loading expected from 6 – 12 years after the last fire (Roccaforte *et al.* 2012).

Large Trees

Ponderosa pine (*Pinus ponderosa* Dougl. ex P. & C. Laws) stands with late-seral features are found infrequently, owing to past management activities throughout western North America. Thus, management objectives often focus on maintaining existing late-seral stands. Observations over a 65-year period of stands with no past history of harvest showed substantial ingrowth in the smaller diameter classes and elevated rates of mortality among the largest mature trees in the stand. Adjacent stands, with combinations of thinning and prescribed fire, had far fewer high-risk mature trees and generally lower rates of mortality after treatment. Forecasts using individual-tree diameter growth and mortality models suggest that observed mortality in these stands with remaining old trees and a dense understory will continue in the absence of any treatment. Increased vigor in thinned stands appeared to be offset by an increase in mortality of large trees when thinning was followed by prescribed fire. (Richie *et al.* 2008)

Where site specific mitigation is needed to limit damage or mortality to large or old trees, it is best accomplished by reducing accumulations of fuels within the dripline and in the immediate vicinity of the trees. These fuels may include litter, duff, accumulations of woody fuels, ladder fuels, or any fuel that could produce sufficient heat to lethally damage a tree, whether by high or low intensity fire. This can be accomplished manually, mechanically, or through fire treatments. Potential measures include implementing prescription parameters, ignition techniques, raking, wetting, leaf blowing, thinning, or otherwise mitigating fire impacts to the degree necessary to meet burn objectives. Throughout the life of this project, it is likely that some large trees would be damaged or killed by prescribed fire. It would not be possible to mitigate every large tree over 40,000 to 60,000 acres of prescribed fire units each year. Data collected from restoration treatments in the White Mountains indicates that mortality of pre-settlement trees increased with thin/burn, or burn only treatments over controls, although those that survived grew significantly faster than those in untreated stands (Fule *et al.* 2007; Roccaforte *et al.* 2015). Managers will have to consider tradeoffs between treatment options, and the increasing likelihood of the trees burning in wildfires under conditions that would be more extreme than conditions under which a prescribed fire would be conducted.

Mechanical treatments and prescribed fire would be implemented to help sustain large trees across the landscape, and make them more resistant and resilient to natural disturbances such as fire. Throughout the life of this project, it is likely that some large trees may be damaged or killed by prescribed fire, by direct and/or indirect effects, despite mitigation measures. However, under both alternatives thinning and prescribed fire would decrease potential fire effects in the vicinity of most large trees, decreasing the likelihood of lethal damage in the event of a wildfire.

Mitigation measures (Appendix C of FEIS) are unpredictable, and site specific (Kolb *et al.* 2007, Hood 2007), and some can have negative effects of their own. Raking, for example, can remove fine, live roots in the surface organic layers, which may compound the effects of additional shallow roots being damaged by fire, though it is unlikely to actually kill the tree (Progar *et al.* 2017). Low intensity fire that causes little crown scorch can stimulate resin production in large trees that may attract bark beetles, increasing tree mortality. Mitigation measures implemented a year or more before a burn, such as thinning or raking, may improve the health of the tree, improving its response to fire.

Effects Unique to Each Alternative

Alternative 2 – Modified Proposed Action

Alternative 2 proposes to conduct about 991,060 873,420 acres of mechanical and prescribed fire treatments and an additional 114,550 117,640 acres of prescribed fire only treatments over about 20 years. On average, 87,532 acres of vegetation would be mechanically treated annually. On average, 99,106 acres of prescribed fire would be implemented annually across the Forests (within the treatment area).

When analyzed at the scale of the treatment area, Alternative 2 would meet the purpose and need by moving the project area towards the desired condition of having potential for less than 10% active crown fire under extreme weather conditions, lessening post fire detrimental effects and creating a safer and more effective firefighting environment.

This alternative would meet direction in the Forest Service Manual 5100 (page 9) which includes direction on USFS use of prescribed fire to meet land and resource management goals and objectives. Objectives of fire management on lands managed by the USFS include:

1. Forest Service fire management activities shall always put human life as the single, overriding priority. The proposed actions of the Rim Country fully support incorporation of the highest standards for firefighter and public safety and are expected to improve and enhance the safety of the public as it relates to wildland fire.
2. Forest Service fire management activities should result in safe, cost-effective fire management programs that protect, maintain, and enhance National Forest System lands, adjacent lands, and lands protected by the Forest Service under cooperative agreement. Rim Country proposes to achieve restoration by restoring ecosystems within the treated area to a condition so that fire, when it occurs, would be beneficial to the ecosystems in which it burns without threatening lives, property, or resources. This would be achieved by fully integrating local industry, mechanical and fire prescriptive treatments, and providing for sustainable supplies of goods, services, and social values through implementation of appropriate fire management activities.

Direct and Indirect Effects

From a fire ecology perspective, direct and indirect effects of Alternative 2 relate primarily to treatments that include mechanical thinning, prescribed fire, or both to meet the purpose and need of the project.

Changes to potential fire behavior are the indirect effects of changes to fuel loading and structure. A direct effect of implementing Alternative 2, would be changes to the horizontal and vertical continuity of canopy fuels. As that continuity is broken up, an indirect effect would be decreased potential for crown fire.

Thinning, whether or not slash was removed from the site, would give managers more control of the amount and timing of emissions. As thinning and first-entry burns were completed, burn windows would expand for larger areas so more burning could occur when ventilation was good. Trees would be more fire resistant, and understory and surface vegetation would become established. With lower surface fuel loading and canopy fuels adapted to fire, burn windows would be broader than for initial entry burns. Decision space for managing unplanned ignitions would expand as Rim Country (and other projects) are implemented.

Rim Country Project Area Metrics and Measures

Tables showing the modeled fire hazard index, fire type and surface fuel loadings for each 6th code HUC in the project area as modeled for Alternative 2 are presented in Table 13.

Table 13: Alternative 2 HUC6 watershed metrics

| Map Label | Watershed ID | Watershed Name | % Active Crown Fire | % Moderate - Extreme FHI |
|-----------|--------------|--|---------------------|--------------------------|
| 1 | 150200000000 | Upper Brown Creek | 6% | 12% |
| 3 | 150200000000 | Mortensen Wash | 3% | 3% |
| 4 | 150200000000 | Barbershop Canyon | 15% | 27% |
| 5 | 150200000000 | Leonard Canyon | 8% | 15% |
| 6 | 150200000000 | Gentry Canyon | 9% | 28% |
| 7 | 150200000000 | Reynolds Creek | 26% | 50% |
| 8 | 150200000000 | Double Cabin Park-Jacks Canyon | 16% | 21% |
| 9 | 150200000000 | East Verde River Headwaters | 4% | 24% |
| 10 | 150200000000 | Webber Creek | 12% | 38% |
| 11 | 150200000000 | Sepulveda Creek | 15% | 17% |
| 12 | 150200000000 | Cabin Draw | 18% | 19% |
| 13 | 150200000000 | Upper Chevelon Canyon-Chevelon Canyon Lake | 15% | 25% |
| 14 | 150200000000 | Bear Canyon-Black Canyon | 14% | 16% |
| 15 | 150601000000 | Bull Flat Canyon | 1% | 9% |
| 16 | 150200000000 | Red Tank Draw | 32% | 37% |
| 17 | 150200000000 | Upper Willow Valley | 4% | 7% |
| 18 | 150200000000 | Home Tank Draw | 8% | 11% |
| 19 | 150200000000 | Pine Creek | 9% | 34% |
| 20 | 150200000000 | Linden Draw | 15% | 15% |
| 21 | 150601000000 | West Fork Cottonwood Wash-Cottonwood Wash | 3% | 3% |
| 22 | 150200000000 | Upper Day Wash | 3% | 3% |
| 23 | 150200000000 | Upper Willow Creek | 8% | 15% |
| 24 | 150200000000 | Middle Wildcat Canyon | 14% | 16% |
| 25 | 150200000000 | Lower Wildcat Canyon | 42% | 42% |
| 26 | 150200000000 | Upper Potato Wash | 31% | 31% |
| 27 | 150200000000 | Christopher Creek | 9% | 32% |
| 28 | 150200000000 | Lower Willow Valley | 6% | 7% |
| 29 | 150200000000 | Upper West Clear Creek | 9% | 13% |
| 30 | 150200000000 | Hardscrabble Creek | 19% | 36% |
| 32 | 150200000000 | Dodson Wash | 30% | 30% |
| 33 | 150200000000 | Long Tom Canyon-Chevelon Canyon | 8% | 24% |
| 34 | 150200000000 | Upper West Chevelon Canyon | 6% | 11% |
| 35 | 150200000000 | Parallel Canyon-Cherry Creek | 2% | 14% |

| Map Label | Watershed ID | Watershed Name | % Active Crown Fire | % Moderate - Extreme FHI |
|------------------|---------------------|--|----------------------------|---------------------------------|
| 36 | 150200000000 | Rock Creek | 13% | 31% |
| 37 | 150200000000 | Clover Creek | 21% | 25% |
| 38 | 150200000000 | Ellison Creek | 6% | 22% |
| 42 | 150200000000 | Wilkins Canyon | 7% | 13% |
| 43 | 150200000000 | Lower Willow Creek | 24% | 28% |
| 44 | 150200000000 | Upper Pierce Wash | 13% | 13% |
| 45 | 150200000000 | Upper Brookbank Canyon | 11% | 11% |
| 46 | 150200000000 | Gruwell Canyon-Cherry Creek | 8% | 41% |
| 47 | 150200000000 | Workman Creek | 16% | 42% |
| 48 | 150200000000 | Buzzard Roost Canyon | 10% | 31% |
| 49 | 150200000000 | Gordon Canyon | 11% | 47% |
| 50 | 150200000000 | Upper Fossil Creek | 3% | 10% |
| 51 | 150200000000 | Windmill Draw-Jacks Canyon | 8% | 9% |
| 54 | 150200000000 | Upper Wildcat Canyon | 3% | 4% |
| 55 | 150200000000 | Alder Canyon | 7% | 11% |
| 56 | 150200000000 | Durfee Draw-Chevelon Canyon | 53% | 55% |
| 57 | 150601000000 | Buckskin Wash | 3% | 3% |
| 58 | 150200000000 | Upper Salome Creek | 12% | 34% |
| 59 | 150200000000 | Upper Spring Creek | 5% | 29% |
| 60 | 150200000000 | Horton Creek-Tonto Creek | 7% | 29% |
| 61 | 150601000000 | Brady Canyon | 22% | 24% |
| 62 | 150200000000 | Tremaine Lake | 4% | 5% |
| 63 | 150200000000 | Dogie Tank-Jacks Canyon | 10% | 13% |
| 64 | 150601000000 | Bagnal Draw-Show Low Creek | 1% | 1% |
| 65 | 150200000000 | Stinson Wash | 10% | 10% |
| 66 | 150200000000 | Upper Phoenix Park Wash | 8% | 8% |
| 68 | 150200000000 | Lower West Chevelon Canyon | 17% | 17% |
| 69 | 150200000000 | Bull Tank Canyon-Tonto Creek | 24% | 51% |
| 70 | 150200000000 | Toms Creek | 3% | 10% |
| 73 | 150200000000 | Decker Wash | 7% | 7% |
| 74 | 150200000000 | Gentry Canyon | 10% | 17% |
| 75 | 150200000000 | East Clear Creek-Clear Creek | 12% | 19% |
| 76 | 150200000000 | Woods Canyon and Willow Springs Canyon | 4% | 5% |
| 77 | 150200000000 | West Fork Black Canyon | 4% | 8% |
| 78 | 150200000000 | Canyon Creek Headwaters | 2% | 17% |
| 79 | 150200000000 | Haigler Creek | 13% | 50% |
| 80 | 150200000000 | Long Valley Draw | 14% | 16% |

Fire Type

Once fully implemented, Alternative 2 is expected to reduce the potential for active and conditional crown fire to within desired conditions for all vegetation cover types (see Table 15 below). Over the rim country project area, 11% of the area burned under extreme weather conditions would be expected to be active or conditional crown fire, down from 30% given existing conditions (Figure 23). Passive crown fire increases slightly (49% up from 43% EC) under extreme conditions, due to the desired clumpy canopy characteristics of the mechanical treatments. Under less extreme wind conditions (5 MPH instead of 20 MPH), the majority of the landscape (95%) is expected to burn as a surface fire. Maximum reductions in crown fire activity will be achieved following the second re-entry prescribed fire. Following this, crown fire activity may begin to increase unless continued maintenance burning occurs in perpetuity.

Post wildfire watershed effects increase with the percent of the watershed burns with moderate to high severity fire (Cannon 2010; Neary 2011). Under Alternative 2, 5 watersheds are expected to burn with active crown fire under extreme weather conditions for over 30%³ of the watershed, which would result in moderate to high severity effects (Figure 24). One watershed is expected to exceed 50% of the watershed burned with active crown fire. Watersheds 56 (Durfee Draw-Chevelon Canyon) has the highest proportion of potential for active crown fire (53%). If a large wildfire were to burn within these watersheds under extreme fire weather conditions, detrimental post wildfire effects, such as debris flows, would be expected.

Fire Hazard Index

Alternative 2 would decrease the risk of undesirable wildfire behavior and effects that could threaten lives, resources, and infrastructure. After implementation, the Fire Hazard Index decreases resulting in 21% of the project area is within the moderate to extreme FHI, down from 36% in the existing conditions (Figure 26). The areas of moderate to extreme presents difficult and dangerous suppression conditions during a wildfire and potential for adverse post fire effects on soils and surface water quality. Maximum reductions in FHI will be achieved following the second re-entry prescribed fire. Following this, FHI may begin to increase unless continued maintenance burning occurs in perpetuity. There are 3 watersheds with over 50% of the watershed in the moderate to extreme FHI categories (Figure 25). Watershed 56 (Durfee Draw-Chevelon Canyon, 55%) and 69 (Bull Tank Canyon-Tonto Creek, 51%) have the highest proportion of FHI in the moderate to very high class. Large wildfires in these watersheds would still have a high potential to be difficult and dangerous to suppress, and have a high potential for adverse post fire effects.

Surface Fuels loadings

Under the Alternative 2, surface fuel loading would initially increase with mechanical treatment. As first and second entry prescribed burns are implemented, these fuel loadings would decrease in most areas except those proposed for MSO treatments, which are designed to maintain a higher level of fuel loading, especially Coarse Woody Debris (dead/down woody fuels greater than 3" in diameter).

Desired conditions for total surface fuel loadings are less than 27 tons/ac in Ponderosa Pine vegetation types and less than 30 tons/ac in Dry Mixed Conifer. Under Alternative 2, 23,984 acres of Ponderosa Pine (down from 60,023 ac in the Existing Conditions) and 8,763 acres of Mixed Conifer – Frequent Fire vegetation types (down from 12,262 in the Existing Conditions) exceed

³ Percentage values are based on USFS lands only within a given watershed.

recommended fuel loadings (Figure 27). Maximum reductions in surface fuel loading will be achieved following the second re-entry prescribed fire. Following this, surface fuel loading may begin to increase unless continued maintenance burning occurs in perpetuity.

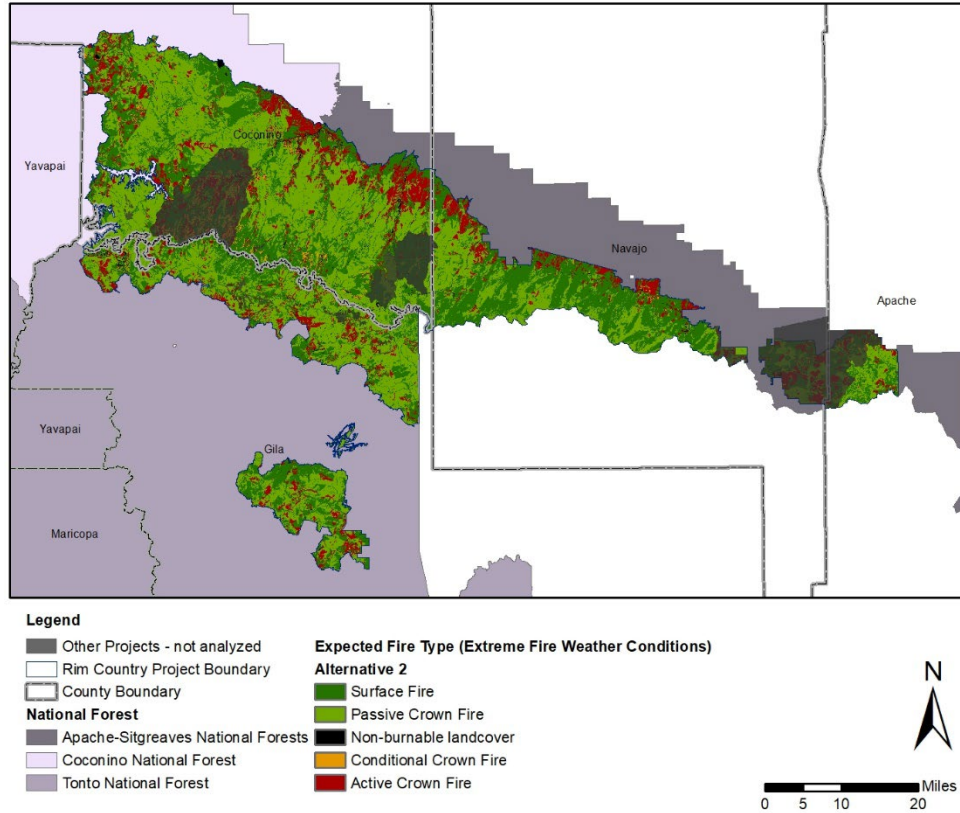


Figure 23: Expected Fire Type for Alternative 2, under modeled weather conditions.

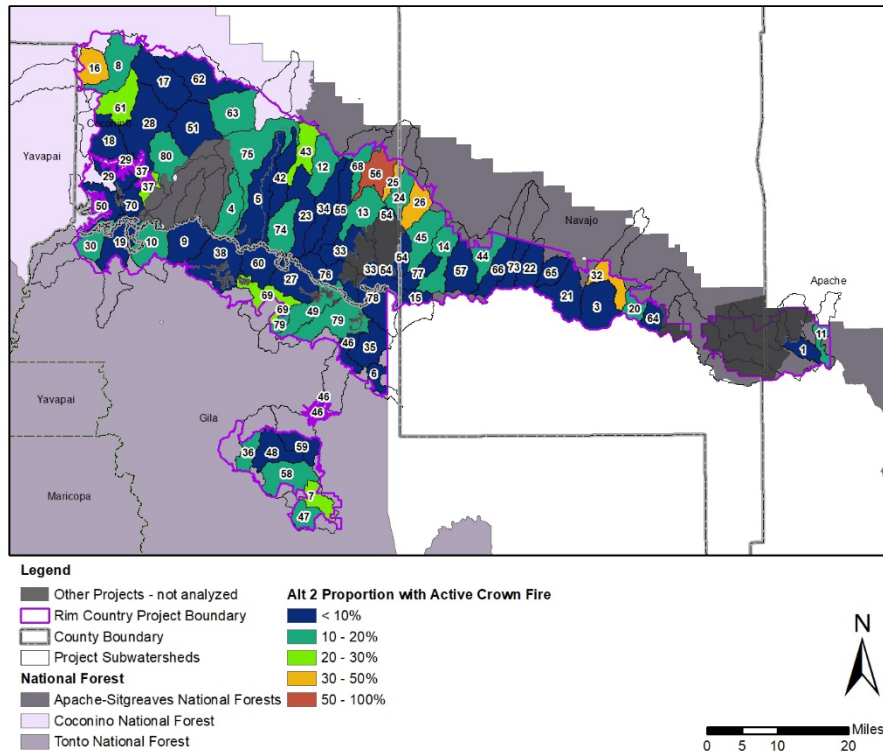


Figure 24: Proportion of each HUC6 watershed with Active Crown Fire for Alternative 2, under modeled weather conditions.

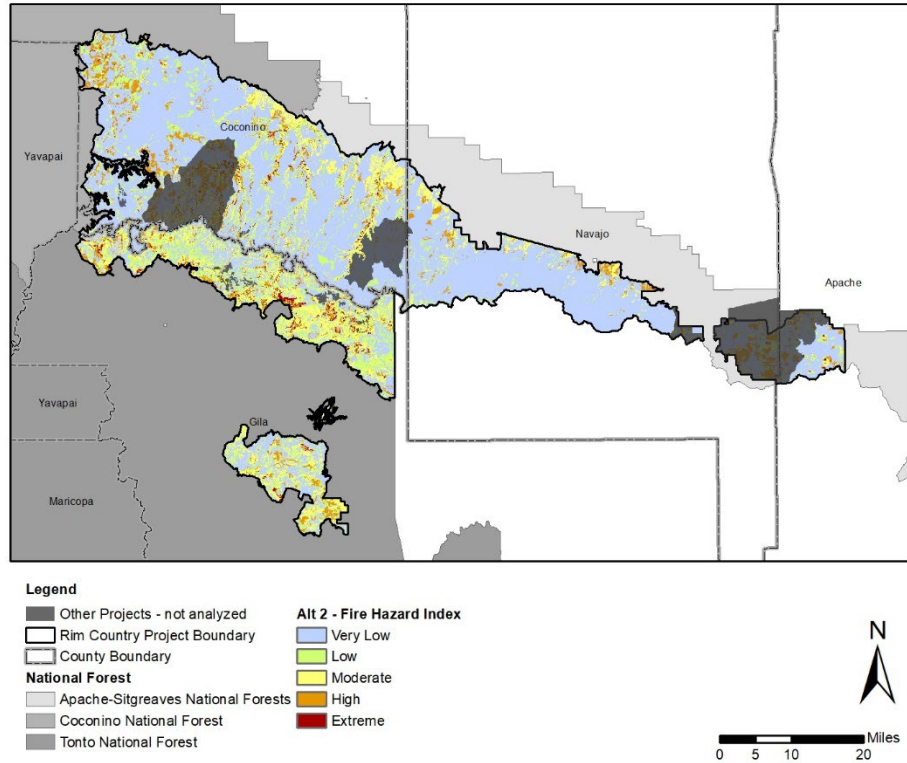


Figure 26: Fire Hazard Index for Alternative 2, under modeled weather conditions.

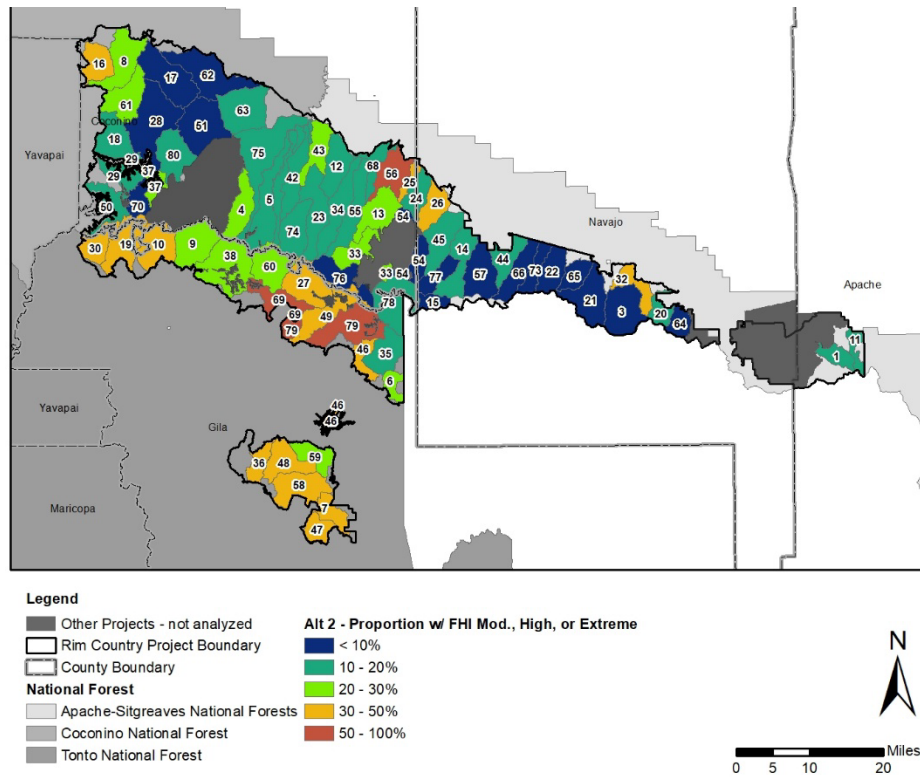


Figure 25: Proportion of each HUC6 watershed with Moderate, High or Very High Fire Hazard Index for Alternative 2, under modeled weather conditions.

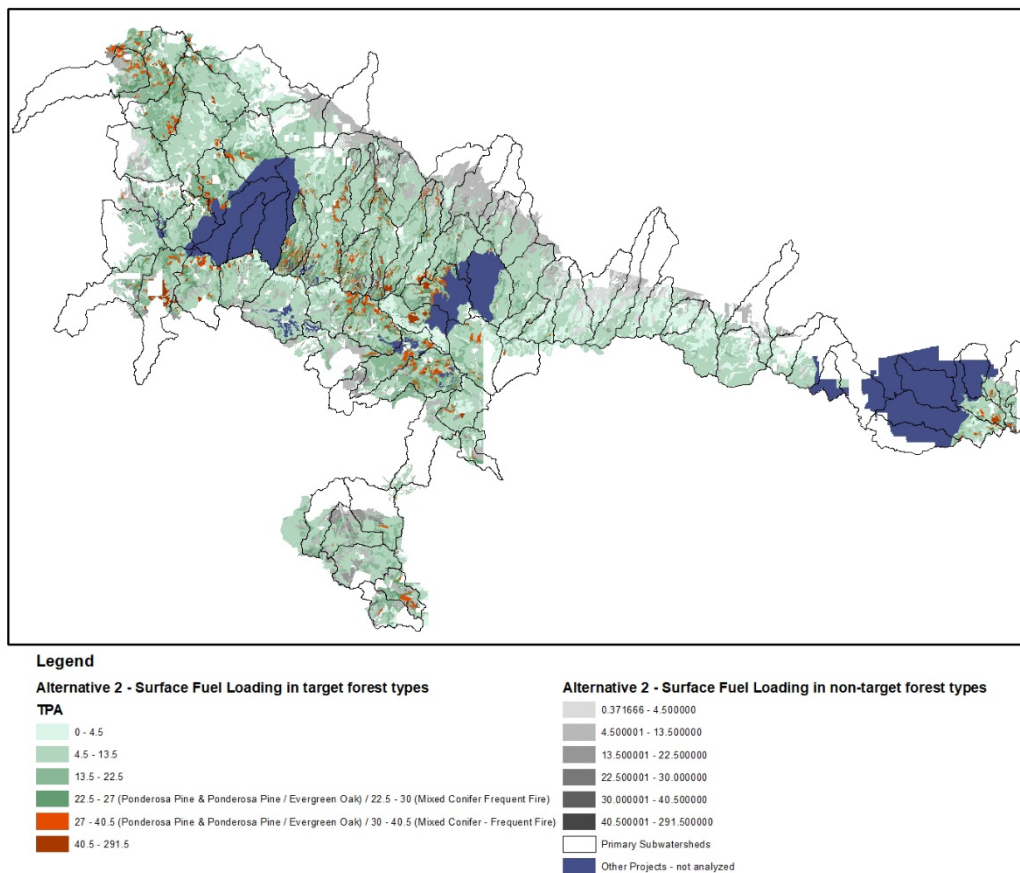


Figure 27: Surface Fuel Loads for Alternative 2, under modeled fire weather

Effects on Values, Resources and Assets

Wildfire Management

Wildfire management environment would become safer and more effected as both CFA and FHI decrease. Even under extreme fire weather, suppression tactics would be more effective than current conditions. Decision space for managing unplanned ignitions would expand as Rim Country is implemented.

WUI

Under the Alternative 2, WUI areas on Forest Service lands across the treatment area would be more fire adapted, however increasing smoke from prescribed fires would be present next to homes. CFA and FHI both decrease on Forest Service lands (Table 14). The potential for home and asset loss from crown fires, high intensity surface fires and ember lofting from fires on Forest Service land would decrease. The need for private and non-forest service landowners to manage fuels on their lands in order to compliment Rim Country initiatives will be imperative to fully mitigate risk and impacts from wildfires.

Table 14: Alternative 2 metrics for the Wildland Urban Interface

| Alternative 2 | | Fire Hazard Index | | | | Fire Type | |
|-------------------------------|-------------|-------------------|----------|------|-----------|-----------------------------|-------------------|
| WUI Class | Total Acres | Very Low - Low | Moderate | High | Very High | Passive & Active Crown Fire | Active Crown Fire |
| Communication Sites | 13,333 | 83% | 9% | 8% | 0% | 58% | 10% |
| FS Buildings & Rec Residences | 10,548 | 82% | 8% | 9% | 0% | 55% | 12% |
| High Value Rec Sites | 5,581 | 85% | 11% | 3% | 1% | 60% | 8% |
| Non-FS Land with Structures | 144,691 | 79% | 14% | 7% | 1% | 55% | 12% |
| Transmission Lines | 28,885 | 79% | 12% | 8% | 1% | 55% | 13% |

Vegetation Cover Type

At the project scale, active crown fire and Fire Hazard Index are reduced for all target vegetation cover types (Table 15). At the project area scale, ponderosa pine would meet desired conditions for active crown fire (<10%), under Alternative 2 even under the extreme conditions modeled.

Table 15: Alternative 2 Metrics for Vegetation Cover Type

| ERU | Total Acres | Fire Hazard Index | | | | Fire Type | |
|-------------------------------|-------------|-------------------|----------|------|-----------|----------------|-------------------|
| | | Very Low - Low | moderate | high | very high | All Crown Fire | Active Crown Fire |
| Ponderosa Pine | 642,198 | 90% | 6% | 4% | 0% | 68% | 5% |
| PIPO Evergreen Oak | 148,332 | 64% | 31% | 4% | 1% | 62% | 3% |
| Mixed Conifer – Frequent Fire | 52,723 | 79% | 13% | 6% | 1% | 11% | 9% |
| Mixed Conifer with Aspen | 4,739 | 31% | 39% | 24% | 6% | 73% | 61% |
| Aspen | 1,416 | 93% | 1% | 5% | 0% | 6% | 6% |
| Pinyon Juniper | 135,062 | 49% | 33% | 16% | 2% | 51% | 47% |
| Madrean Pinyon Oak | 23,056 | 57% | 13% | 21% | 9% | 40% | 35% |
| Grasslands | 15,946 | 97% | 1% | 1% | 0% | 16% | 2% |
| Riparian Areas | 13,050 | 76% | 17% | 5% | 1% | 34% | 8% |

Large trees

Under Alternative 2, the potential for fire-related mortality of large trees would be reduced across the landscape. Ignition techniques or other mitigations would be employed to minimize residence time in duff adjacent to old trees whenever possible. Under this alternative, low severity fire would be used in the vicinity of large trees and, to the degree it is practicable, ladder fuels and excessive surface fuel buildups adjacent to large trees would be removed before burning. Scorch is one of the primary factors in large tree mortality (Jerman et al. 2004), and is influenced by the vertical arrangement of fuels. Prescribed fire and mechanical treatments in the vicinity of large trees would decrease fuel loading in the immediate vicinity of these trees, decreasing the potential for crown scorch.

Stream/spring restoration

Restoration of 777 miles of streams and numerous springs would occur inside of existing

treatments, with post-treatment conditions meeting desired conditions, but would not be expected to have much effect on fire behavior or effects in the short run. In the long run, restored hydrology in these areas, particularly springs, may result in increased surface fuel loading near springs, allowing wildfire or prescribed fire to creep closer to the water source than is generally possible now. Land Management Plan direction allows prescribed fire for fuels management riparian areas.

Roads

Under this alternative, there would approximately 490 miles of system roads decommissioned, and up to 800 miles of unauthorized roads decommissioned. From 1992 through 2015, over 1,582,239 acres of human ignited wildfires burned within the ecoregions contained by the Rim Country project area, 35% of all acres burned in wildfires (4,456,949 acres). Many wildfires that are started by humans begin in proximity to roads so, under this Alternative, there could be fewer human-started wildfires. The more heavily used of these roads have functioned as fire breaks in the past. Once decommissioned, surface fuel loading would eventually grow back, allowing fire to burn across the area. During the implementation of the mechanical treatments, roads improved, constructed or reconstructed for access (480 miles) would be available for access to burn units, and/or to be used as firelines for burns.

Unavoidable Adverse Effects, Irreversible and Irretrievable Commitment of Resources

Under Alternative 2, there is expected to be some old growth tree mortality, however through mitigation measures, this loss is expected to be lower than what a wildfire occurring under existing conditions would produce.

Alternative 3 – Focused

From a fire ecology perspective, direct and indirect effects of Alternative 3 relate primarily to treatments that include mechanical thinning, prescribed fire, or both to meet the purpose and need of the Rim Country. This alternative proposes to conduct about 528,850 acres of restoration activities over about 20 years. On average, 486,816 acres of vegetation would be mechanically treated annually. On average, 52,885 acres of prescribed fire would be implemented annually across the Forests (within the treatment area). Up to two prescribed fires^{2,4} would be conducted on all acres proposed for burning in a given 10-year period.

This alternative would meet direction in the Forest Service Manual 5100 (page 9) which includes direction on USFS use of prescribed fire to meet land and resource management goals and objectives. Objectives of fire management on lands managed by the USFS include:

1. Forest Service fire management activities shall always put human life as the single, overriding priority. The proposed actions of the Rim Country fully support incorporation of the highest standards for firefighter and public safety and are expected to improve and enhance the safety of the public as it relates to wildland fire.
2. Forest Service fire management activities should result in safe, cost-effective fire

⁴ A single prescribed fire may include burning piles and a follow-up broadcast burn. Prescribed fire would be implemented as indicated by monitoring data to augment wildfire acres, with the expectation that desired conditions would require a fire return interval of about 10 years.

management programs that protect, maintain, and enhance National Forest System lands, adjacent lands, and lands protected by the Forest Service under cooperative agreement. Rim Country proposes to achieve restoration by restoring ecosystems within the treated area to a condition so that fire, when it occurs, would be beneficial to the ecosystems in which it burns without threatening lives, property, or resources. This would be achieved by fully integrating local industry, mechanical and fire prescriptive treatments, and providing for sustainable supplies of goods, services, and social values through implementation of appropriate fire management activities.

Direct and Indirect Effects

From a fire ecology perspective, direct and indirect effects of Alternative 3 relate primarily to treatments that include mechanical thinning, prescribed fire as described in the section Effects Common to All Action Alternatives, page 71. Areas without treatments will have the indirect effects associated with Alternative 1 (see section Alternative 1 – No Action, page 63).

Rim Country Project Area Metrics and Measures

Tables showing the modeled fire hazard index, fire type and surface fuel loadings for each 6th code HUC in the project area as modeled for Alternative 3 are presented in Table 16.

Table 16: Alternative 3 HUC6 watershed metrics

| Map Label | Watershed ID | Watershed Name | % Active Crown Fire | % Moderate - Extreme FHI |
|-----------|--------------|--|---------------------|--------------------------|
| 1 | 150200000000 | Upper Brown Creek | 14% | 15% |
| 3 | 150601000000 | Mortensen Wash | 7% | 6% |
| 4 | 150200000000 | Barbershop Canyon | 15% | 15% |
| 5 | 150200000000 | Leonard Canyon | 8% | 7% |
| 6 | 150200000000 | Gentry Canyon | 9% | 10% |
| 7 | 150200000000 | Reynolds Creek | 52% | 58% |
| 8 | 150200000000 | Double Cabin Park-Jacks Canyon | 8% | 8% |
| 9 | 150200000000 | East Verde River Headwaters | 4% | 7% |
| 10 | 150200000000 | Webber Creek | 12% | 16% |
| 11 | 150200000000 | Sepulveda Creek | 18% | 19% |
| 12 | 150200000000 | Cabin Draw | 29% | 29% |
| 13 | 150200000000 | Upper Chevelon Canyon-Chevelon Canyon Lake | 17% | 18% |
| 14 | 150200000000 | Bear Canyon-Black Canyon | 16% | 14% |
| 15 | 150200000000 | Bull Flat Canyon | 6% | 10% |
| 16 | 150200000000 | Red Tank Draw | 13% | 14% |
| 17 | 150200000000 | Upper Willow Valley | 8% | 8% |
| 18 | 150200000000 | Home Tank Draw | 15% | 16% |
| 19 | 150200000000 | Pine Creek | 11% | 14% |
| 20 | 150200000000 | Linden Draw | 16% | 13% |
| 21 | 150601000000 | West Fork Cottonwood Wash-Cottonwood Wash | 6% | 6% |

| Map Label | Watershed ID | Watershed Name | % Active Crown Fire | % Moderate - Extreme FHI |
|-----------|--------------|---------------------------------|---------------------|--------------------------|
| 22 | 150601000000 | Upper Day Wash | 5% | 5% |
| 23 | 150200000000 | Upper Willow Creek | 16% | 17% |
| 24 | 150200000000 | Middle Wildcat Canyon | 23% | 24% |
| 25 | 150200000000 | Lower Wildcat Canyon | 43% | 42% |
| 26 | 150200000000 | Upper Potato Wash | 34% | 26% |
| 27 | 150200000000 | Christopher Creek | 11% | 11% |
| 28 | 150200000000 | Lower Willow Valley | 7% | 8% |
| 29 | 150200000000 | Upper West Clear Creek | 20% | 21% |
| 30 | 150200000000 | Hardscrabble Creek | 22% | 26% |
| 32 | 150200000000 | Dodson Wash | 32% | 29% |
| 33 | 150200000000 | Long Tom Canyon-Chevelon Canyon | 14% | 14% |
| 34 | 150200000000 | Upper West Chevelon Canyon | 10% | 10% |
| 35 | 150200000000 | Parallel Canyon-Cherry Creek | 2% | 3% |
| 36 | 150200000000 | Rock Creek | 15% | 22% |
| 37 | 150200000000 | Clover Creek | 20% | 20% |
| 38 | 150200000000 | Ellison Creek | 8% | 12% |
| 42 | 150200000000 | Wilkins Canyon | 9% | 10% |
| 43 | 150200000000 | Lower Willow Creek | 33% | 22% |
| 44 | 150200000000 | Upper Pierce Wash | 14% | 12% |
| 45 | 150200000000 | Upper Brookbank Canyon | 12% | 9% |
| 46 | 150200000000 | Gruwell Canyon-Cherry Creek | 17% | 26% |
| 47 | 150200000000 | Workman Creek | 26% | 32% |
| 48 | 150200000000 | Buzzard Roost Canyon | 24% | 35% |
| 49 | 150200000000 | Gordon Canyon | 14% | 20% |
| 50 | 150200000000 | Upper Fossil Creek | 30% | 34% |
| 51 | 150200000000 | Windmill Draw-Jacks Canyon | 13% | 13% |
| 54 | 150200000000 | Upper Wildcat Canyon | 3% | 2% |
| 55 | 150200000000 | Alder Canyon | 10% | 10% |
| 56 | 150200000000 | Durfee Draw-Chevelon Canyon | 67% | 62% |
| 57 | 150601000000 | Buckskin Wash | 4% | 3% |
| 58 | 150200000000 | Upper Salome Creek | 27% | 33% |
| 59 | 150200000000 | Upper Spring Creek | 55% | 64% |
| 60 | 150200000000 | Horton Creek-Tonto Creek | 11% | 16% |
| 61 | 150200000000 | Brady Canyon | 4% | 4% |
| 62 | 150200000000 | Tremaine Lake | 7% | 7% |
| 63 | 150200000000 | Dogie Tank-Jacks Canyon | 13% | 15% |
| 64 | 150601000000 | Bagnal Draw-Show Low Creek | 4% | 4% |
| 65 | 150200000000 | Stinson Wash | 9% | 7% |
| 66 | 150200000000 | Upper Phoenix Park Wash | 14% | 13% |

| Map Label | Watershed ID | Watershed Name | % Active Crown Fire | % Moderate - Extreme FHI |
|-----------|--------------|--|---------------------|--------------------------|
| 68 | 150200000000 | Lower West Chevelon Canyon | 44% | 39% |
| 69 | 150200000000 | Bull Tank Canyon-Tonto Creek | 29% | 39% |
| 70 | 150200000000 | Toms Creek | 3% | 4% |
| 73 | 150200000000 | Decker Wash | 12% | 10% |
| 74 | 150200000000 | Gentry Canyon | 19% | 17% |
| 75 | 150200000000 | East Clear Creek-Clear Creek | 14% | 11% |
| 76 | 150200000000 | Woods Canyon and Willow Springs Canyon | 28% | 28% |
| 77 | 150200000000 | West Fork Black Canyon | 9% | 14% |
| 78 | 150200000000 | Canyon Creek Headwaters | 5% | 6% |
| 79 | 150200000000 | Haigler Creek | 19% | 25% |
| 80 | 150200000000 | Long Valley Draw | 33% | 33% |

Fire Type

Alternative 3 is expected to reduce the potential for active and conditional crown fire closer to desired conditions for all vegetation cover types (see Table 18 below), however desired conditions will not be fully attained. Over the rim country project area, 17% of the area burned under extreme weather conditions would be expected to be active or conditional crown fire, down from 30% given existing conditions (Figure 28). Passive crown fire increases slightly (53% up from 43% EC) under extreme conditions, due to the desired clumpy canopy characteristics of the mechanical treatments. Maximum reductions in crown fire activity will be achieved following the second re-entry prescribed fire. Following this, crown fire activity may begin to increase unless continued maintenance burning occurs in perpetuity.

Post wildfire watershed effects increase with the amount of a watershed that burns at high severity fire (Cannon 2010; Neary 2011). Under Alternative 3, 10 watersheds have expected active crown fire under extreme weather conditions for over 30% of the watershed, which would result in high severity effects (Figure 29). Three watersheds have over 50% of the watershed expected to burn with active crown fire. Watersheds 59 (Upper Spring Creek) and 56 (Durfee Draw-Chevelon Canyon) have the highest proportion of potential for active crown fire (55% and 67% respective). If a wildfire were to burn within these watersheds, detrimental post wildfire effects would be expected.

Fire Hazard Index

Alternative 3 would decrease the risk of undesirable wildfire behavior and effects that could threaten lives, resources, and infrastructure. After implementation, the Fire Hazard Index decreases resulting in 17% of the project area is within the moderate to very high FHI (Figure 30), down from 36% in the existing conditions. The areas of moderate to extreme presents difficult and dangerous suppression conditions during a wildfire and potential for adverse post fire effects on soils and surface water quality, up from 37% in the existing conditions. Maximum reductions in FHI will be achieved following the second re-entry prescribed fire. Following this, FHI may begin to increase unless continued maintenance burning occurs in perpetuity.

There are 3 watersheds with over 50% of the watershed in the moderate to very high FHI categories (Figure 31). Watershed 56 (Durfee Draw-Chevelon Canyon, 62%) and 59 (Upper

Spring Creek, 64%) have the highest proportion of FHI in the moderate to very high class. Large wildfires in these watersheds have a high potential to be difficult and dangerous to suppress, and have a high potential for adverse post fire effects.

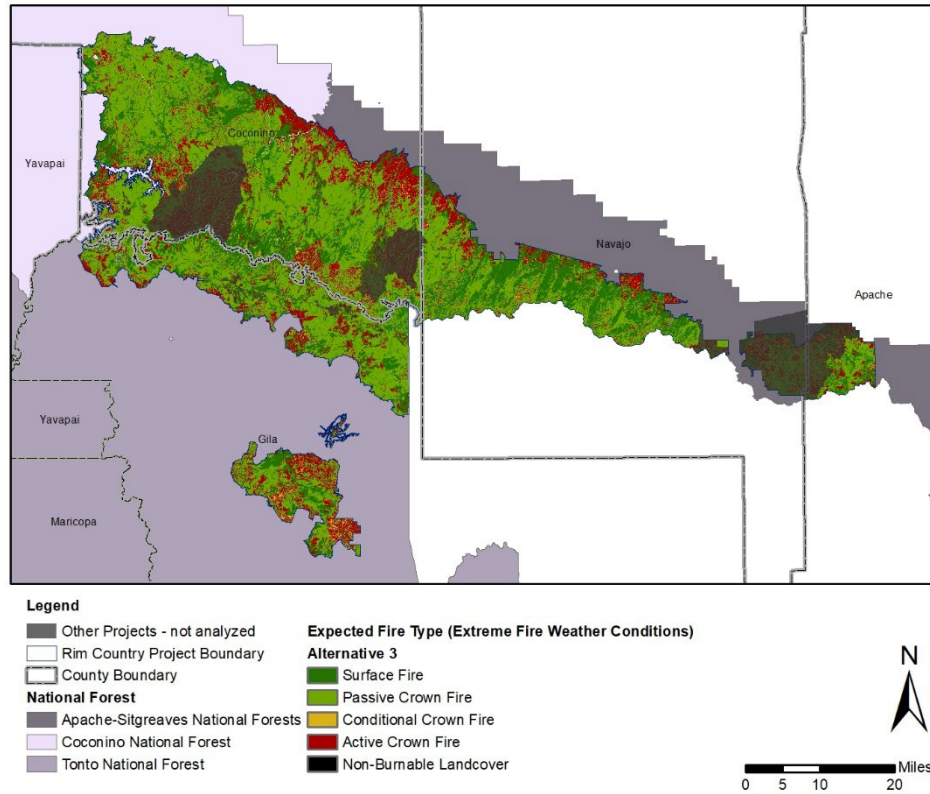


Figure 28: Expected Fire Type for Alternative 3, under modeled weather conditions.

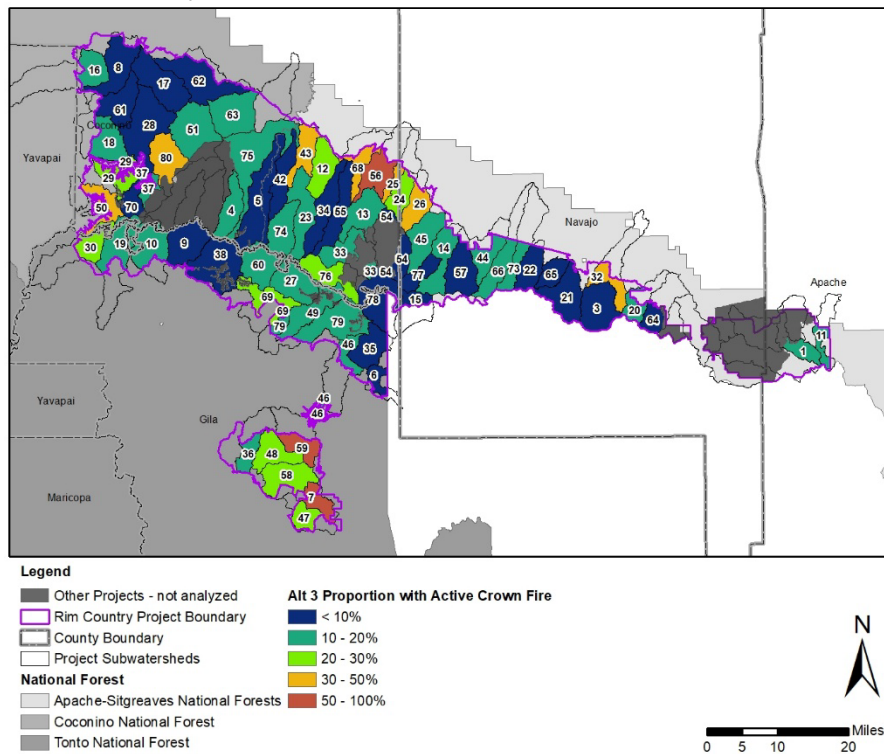


Figure 29: Proportion of each HUC6 watershed with Active Crown Fire for Alternative 3, under modeled weather conditions.

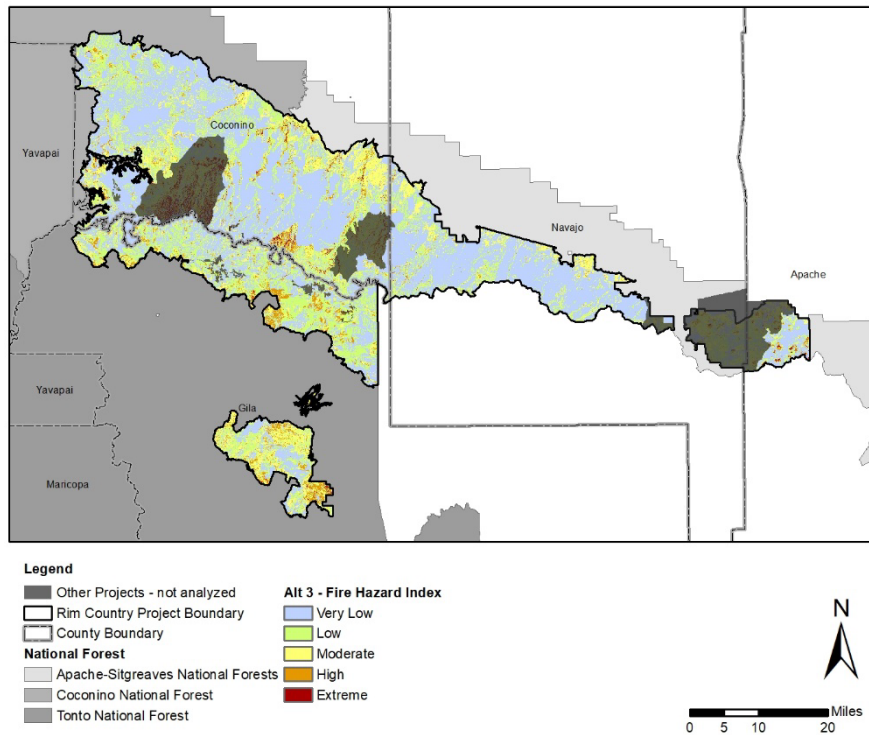


Figure 30: Fire Hazard Index for Alternative 3, under modeled weather conditions.

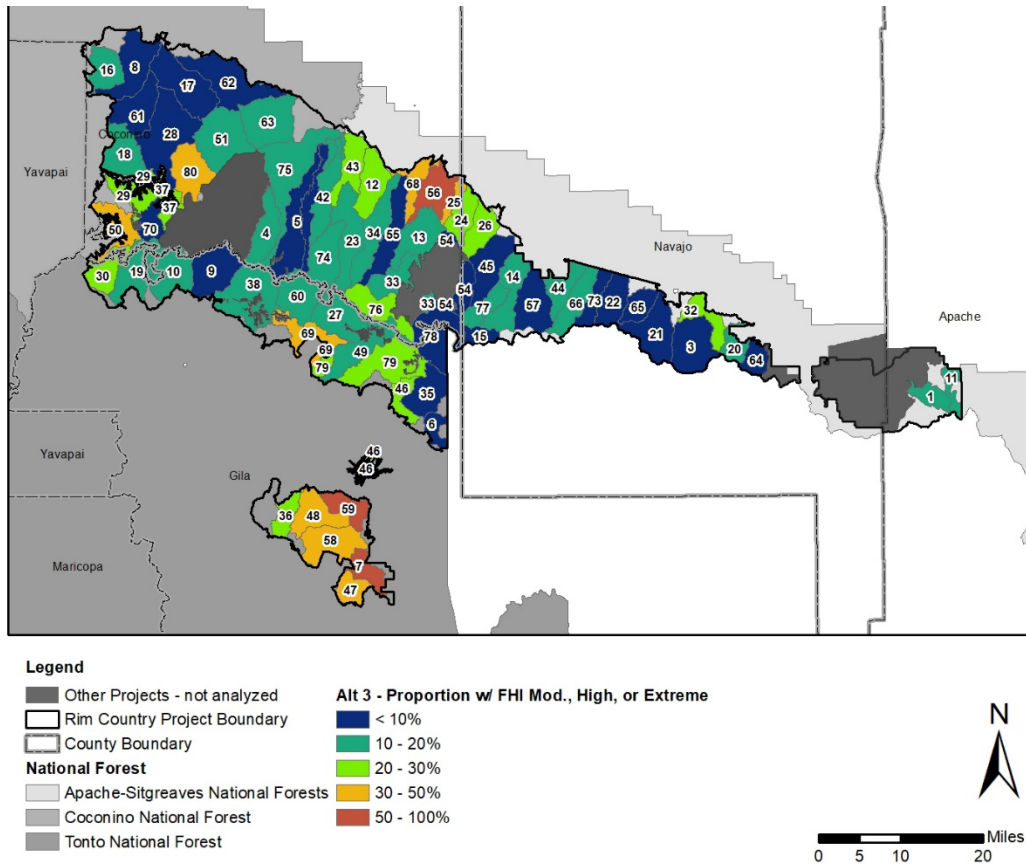


Figure 31: Proportion of each HUC6 watershed with Moderate, High or Very High Fire Hazard Index for Alternative 2, under modeled weather conditions

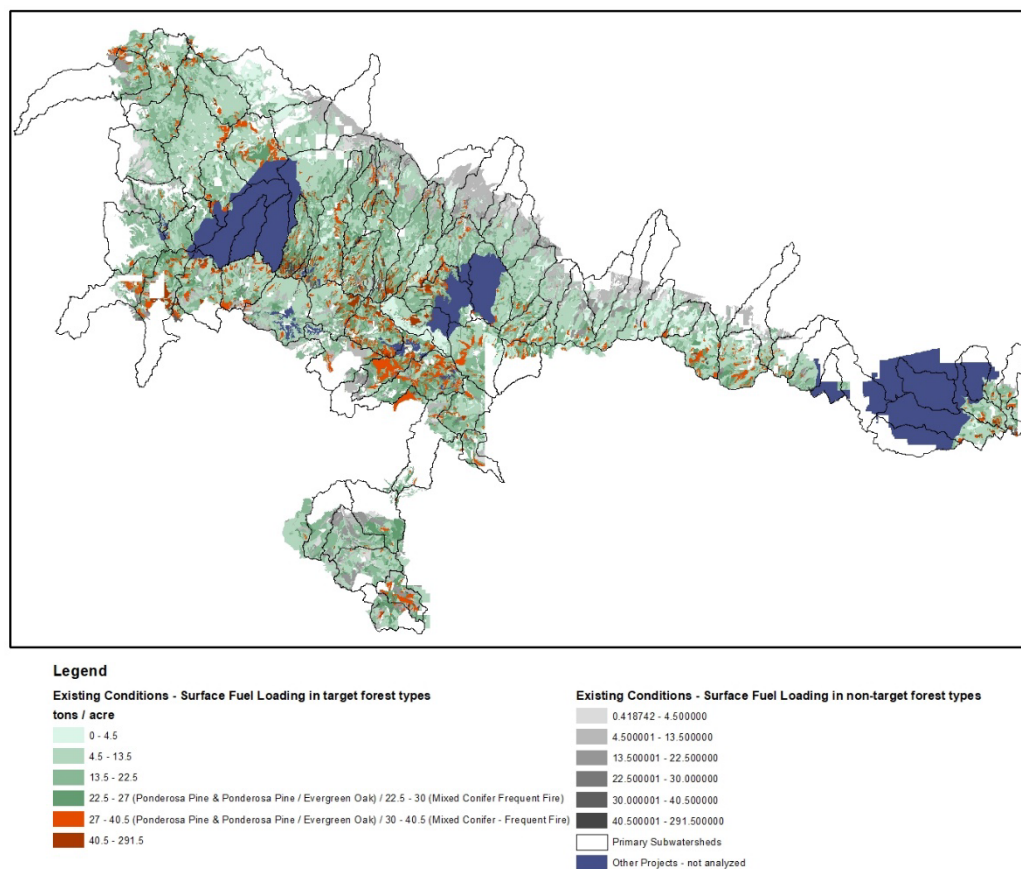


Figure 32: Total Surface Fuel Loadings for Alternative 3, under modeled weather conditions.

Surface Fuel Loadings

Under the Alternative 3, surface fuel loading would initially increase with mechanical treatment, and would also increase where no treatments occur. As first and second entry prescribed burns are implemented, these fuel loadings would decrease in most areas except those proposed for MSO treatments, which are designed to maintain a higher level of fuel loading, especially Coarse Woody Debris (dead/down woody fuels greater than 3" in diameter).

Desired conditions for total surface fuel loadings are less than 27 tons/ac in Ponderosa Pine vegetation types and less than 30 tons/ac in Dry Mixed Conifer. Under Alternative 3, 46,894 acres of Ponderosa Pine and 9,846 acres of Dry Mixed Conifer vegetation types exceed recommended fuel loadings (Figure 32). Maximum reductions in surface fuel loading will be achieved following the second re-entry prescribed fire. Following this, surface fuel loading may begin to increase unless continued maintenance burning occurs in perpetuity.

Wildfire Management

Wildfire management environment would become safer and more effected as both CFA and FHI decrease. However in areas where no treatments are planned, CFA and FHI both increase. Even under extreme fire weather, suppression tactics would be more effective than current conditions. Decision space for managing unplanned ignitions would expand as Rim Country (and other projects) are implemented.

WUI

Under the Alternative 3, WUI areas on Forest Service lands across the treatment area would be more fire adapted, however increasing smoke from prescribed fires would be present next to homes. CFA and FHI both decrease on Forest Service lands (Table 17). The potential for home and asset loss from crown fires, high intensity surface fires and ember lofting from fires on Forest Service land would decrease. The need for private and non-forest service landowners to manage fuels on their lands in order to compliment Rim Country initiatives will be imperative to fully mitigate risk and impacts from wildfires.

Table 17: Alternative 3 metrics for the Wildland Urban Interface

| Alternative 3 | | Fire Hazard Index | | | | Fire Type | |
|-------------------------------|-------------|-------------------|----------|------|-----------|-----------------------------|-------------------|
| WUI Class | Total Acres | Very Low - Low | Moderate | High | Very High | Passive & Active Crown Fire | Active Crown Fire |
| Communication Sites | 13,333 | 83% | 11% | 5% | 1% | 70% | 16% |
| FS Buildings & Rec Residences | 10,548 | 83% | 9% | 7% | 1% | 68% | 17% |
| High Value Rec Sites | 5,581 | 79% | 13% | 7% | 1% | 73% | 21% |
| Non-FS Land with Structures | 144,691 | 86% | 11% | 3% | 0% | 64% | 15% |
| Transmission Lines | 28,885 | 82% | 13% | 4% | 1% | 63% | 18% |

Vegetation Cover Type

At the project scale, active crown fire and Fire Hazard Index are reduced for all target vegetation cover types (Table 18). At the project area scale, ponderosa pine would meet desired conditions for active crown fire (<10%), under the extreme conditions modeled. However, individual stands may exceed the desired conditions at the stand scale. .

Table 18: Alternative 3 metrics by Vegetation Cover class

| Vegetation Cover Type | Total Acres | Fire Hazard Index | | | | Fire Type | |
|-------------------------------|-------------|-------------------|----------|------|-----------|----------------|-------------------|
| | | Very Low - Low | moderate | high | very high | All Crown Fire | Active Crown Fire |
| Ponderosa Pine | 642,198 | 91% | 7% | 2% | 0% | 77% | 8% |
| PIPO Evergreen Oak | 148,332 | 77% | 17% | 5% | 0% | 73% | 11% |
| Mixed Conifer – Frequent Fire | 52,723 | 84% | 5% | 8% | 2% | 20% | 14% |
| Mixed Conifer with Aspen | 4,739 | 45% | 17% | 22% | 15% | 71% | 65% |
| Aspen | 1,416 | 95% | 2% | 3% | 0% | 6% | 6% |
| Pinyon Juniper | 135,062 | 54% | 38% | 8% | 0% | 61% | 56% |
| Madrean Pinyon Oak | 23,056 | 40% | 27% | 33% | 1% | 68% | 61% |
| Grasslands | 15,946 | 98% | 1% | 0% | 0% | 16% | 2% |
| Riparian Areas | 13,050 | 91% | 6% | 3% | 0% | 34% | 8% |

Large Trees

Under Alternative 3, the potential for fire-related mortality of large trees would be reduced across the landscape where treatments are implemented in the same manner as Alternative 2. In areas where no treatments are applied, large trees would respond as in Alternative 1.

Stream/spring restoration

Restoration of ephemeral streams, and springs would occur inside of existing treatments, with post-treatment conditions meeting desired conditions, but would not be expected to have much effect on fire behavior or effects in the short run. In the long run, restored hydrology in these areas, particularly springs, may result in increased surface fuel loading near springs, allowing wildfire or prescribed fire to creep closer to the water source than is generally possible now. Land Management Plan direction allows prescribed fire for fuels management riparian areas.

Roads

From 1992 through 2015, over 1.6 million acres of human ignited wildfires burned on Williams, Tusayan, Flagstaff, and Mogollon Rim Ranger Districts, 35% of all acres burned in wildfires (FOA Dataset - Short, 2015). Many wildfires that are started by humans begin in proximity to roads so, under this Alternative, there could be fewer human-started wildfires. The more heavily used of these roads have functioned as fire breaks in the past. Once decommissioned, surface fuel loading would eventually grow back, allowing fire to burn across the area. During the implementation of the mechanical treatments, roads constructed or reconstructed for access would be available for access to burn units, and/or to be used as firelines for burns.

Unavoidable Adverse Effects, Irreversible and Irretrievable Commitment of Resources

Under Alternative 3, there is expected to be some old growth tree mortality. Through mitigation measures, this loss is expected to be lower where treatments occur and higher where treatments do not occur.

Comparison of Alternatives

This report analyzed the effectiveness of 3 alternatives for modifying composition, pattern, and structure as a means of restoring healthy ecological function to ponderosa pine, specifically in regards to fire ecology. All action alternatives are expected to reset the current trajectory of areas proposed for treatment towards greater sustainability and resilience. Aspen, grasslands, oak communities, and some pinyon/juniper communities associated with ponderosa pine are included. Restoring historic fire regimes plays both direct and indirect roles in achieving or maintaining desired conditions for these vegetation communities. All action alternatives move the Rim Country proposed treatment area toward desired conditions. Differences between them are discussed below, and summarized at the end of this section.

Fire Type

The change from existing conditions to post-treatment conditions in the action alternatives results primarily from: 1) mechanical treatments breaking up the vertical and horizontal continuity of canopy fuels; 2) mechanical treatments and prescribed fire raising canopy base heights; and 3) prescribed fire consuming surface fuels and some canopy fuels, and decreasing the potential

intensity of subsequent fires.

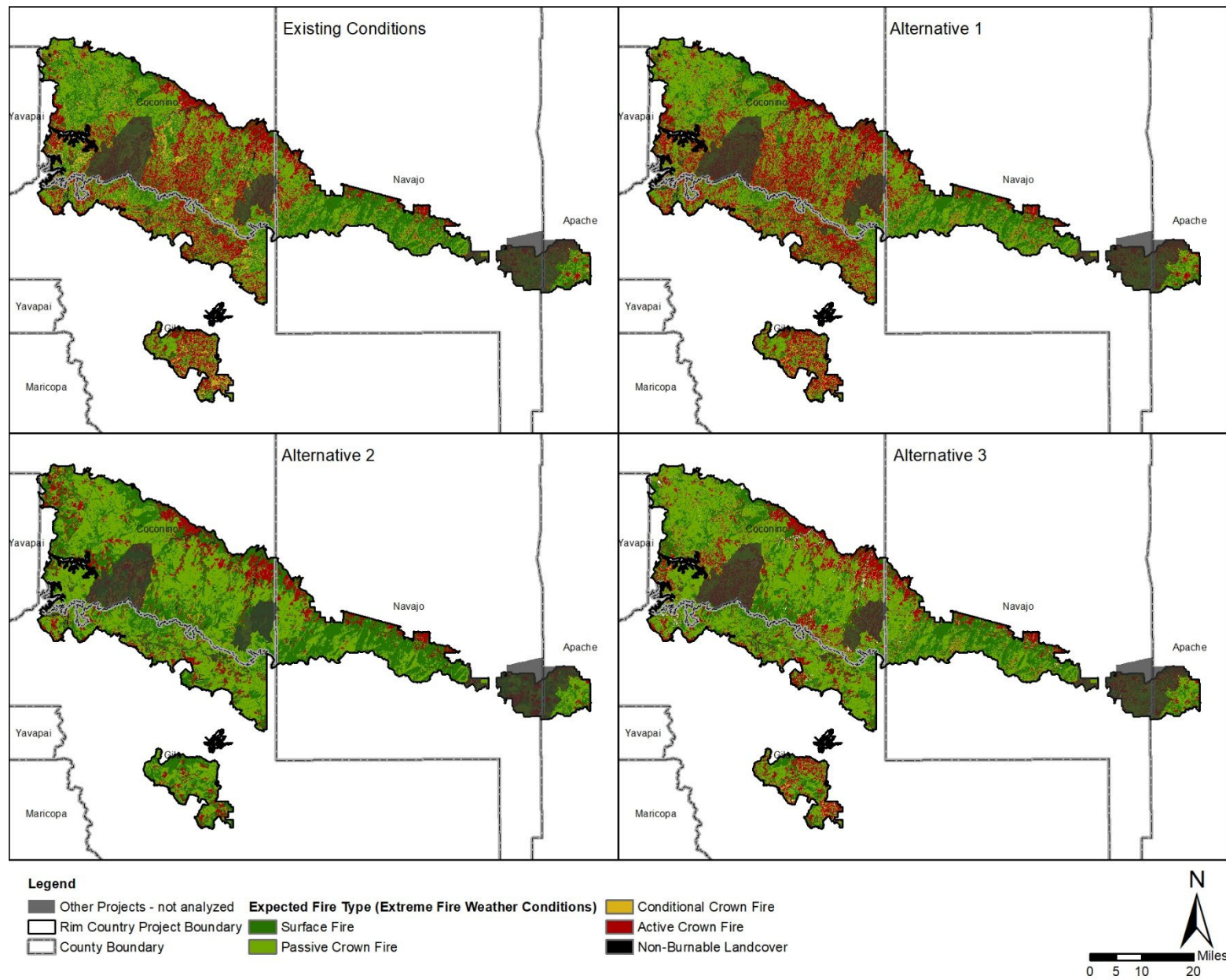


Figure 33: Comparison of Fire Type for each Alternative

Table 19: Comparison of Alternatives Fire Type within the Wildland Urban Interface. Red Numbers are increases from existing conditions (EC), blue number are decreases.

| WUI Class | Total Acres | Fire Type | | | | | | | |
|-------------------------------|-------------|-----------------|------|------|------|--------------------|------|------|------|
| | | All Crown Fire* | | | | Active Crown Fire* | | | |
| | | EC | ALT1 | ALT2 | ALT3 | EC | ALT1 | ALT2 | ALT3 |
| Communication Sites | 13,333 | 75% | 81% | 58% | 70% | 26% | 28% | 10% | 16% |
| FS Buildings & Rec Residences | 10,548 | 76% | 83% | 55% | 68% | 31% | 33% | 12% | 17% |
| High Value Rec Sites | 5,581 | 83% | 85% | 60% | 73% | 31% | 33% | 8% | 21% |
| Non-FS Land with Structures | 144,691 | 70% | 75% | 55% | 64% | 28% | 29% | 12% | 15% |
| Transmission Lines | 28,885 | 65% | 74% | 55% | 63% | 30% | 32% | 13% | 18% |

*Desired condition for ponderosa pine is to have potential for less than 20% crown fire.

Table 20: Comparison of Alternatives for Fire Type by vegetation cover class for extreme fire weather

| Vegetation Cover Type | Total Acres | Passive & Active Crown Fire* | | | | Active Crown Fire* | | | |
|------------------------------|-------------|------------------------------|------|------|------|--------------------|------|------|------|
| | | ECs | Alt1 | Alt2 | Alt3 | ECs | Alt1 | Alt2 | Alt3 |
| Ponderosa Pine | 642,198 | 72% | 82% | 68% | 77% | 20% | 22% | 5% | 8% |
| Ponderosa Pine/Evergreen Oak | 148,332 | 82% | 85% | 62% | 73% | 29% | 30% | 3% | 11% |
| Mixed Conifer/Frequent Fire | 52,723 | 75% | 77% | 11% | 20% | 50% | 54% | 9% | 14% |
| Mixed Conifer with Aspen | 4,739 | 74% | 77% | 73% | 71% | 70% | 74% | 61% | 65% |
| Aspen | 1,416 | 6% | 6% | 6% | 6% | 5% | 5% | 6% | 6% |
| Pinyon-Juniper Woodland | 135,062 | 71% | 71% | 51% | 61% | 65% | 67% | 47% | 56% |
| Madrean Pinyon-Oak | 23,056 | 85% | 86% | 40% | 68% | 79% | 80% | 35% | 61% |
| Grassland/Meadow | 15,946 | 15% | 16% | 16% | 16% | 2% | 2% | 2% | 2% |
| Riparian | 13,050 | 45% | 49% | 34% | 34% | 17% | 19% | 8% | 8% |

Fire Hazard Index

An overall comparison of fire hazard index across alternatives is presented in Figure 34. Alternative 1 results in the largest percentage of the project area in the moderate, high and extreme FHI classes. Alternative 2 provides for the largest overall reduction in FHI for the project area as a whole, while Alternative 3 shows significant reductions in FHI ratings across much of the project area, though less so than Alternative 2.

To further understand the impacts of each proposed alternative based on Fire Hazard Index, it is useful to examine the relative change in FHI rating classes within select areas of interest, especially within Wildland Urban Interface (WUI) classes. As shown in Table 21, Alternative 1 results in a relative increase in the amount of acreage in the high and very high FHI classes across nearly all WUI Classes. Both Alternative 2 and Alternative 3 show a relative decline in the area

of high and very high FHI classes, with a corresponding increase in the area rated as very low-low FHI. This illustrates the effectiveness of both alternatives in reducing the overall Fire Hazard Index rating across all WUI classes. The differences between Alternative 2 and Alternative 3 are limited, reflecting the emphasis of treatment in and adjacent to the WUI areas in both action alternatives. Table 22 provides a further examination of the relative changes in FHI for each vegetation cover type across all alternatives.

Surface Fuel Loading

There are no desired conditions for total surface fuel loading, but 27-30 tons/acres is a reasonable recommendation for average maximum surface fuel loading for the area of this analysis (see discussion on page 29). Historic levels were estimated to be 5 - 20 tons/acre for CWD alone.

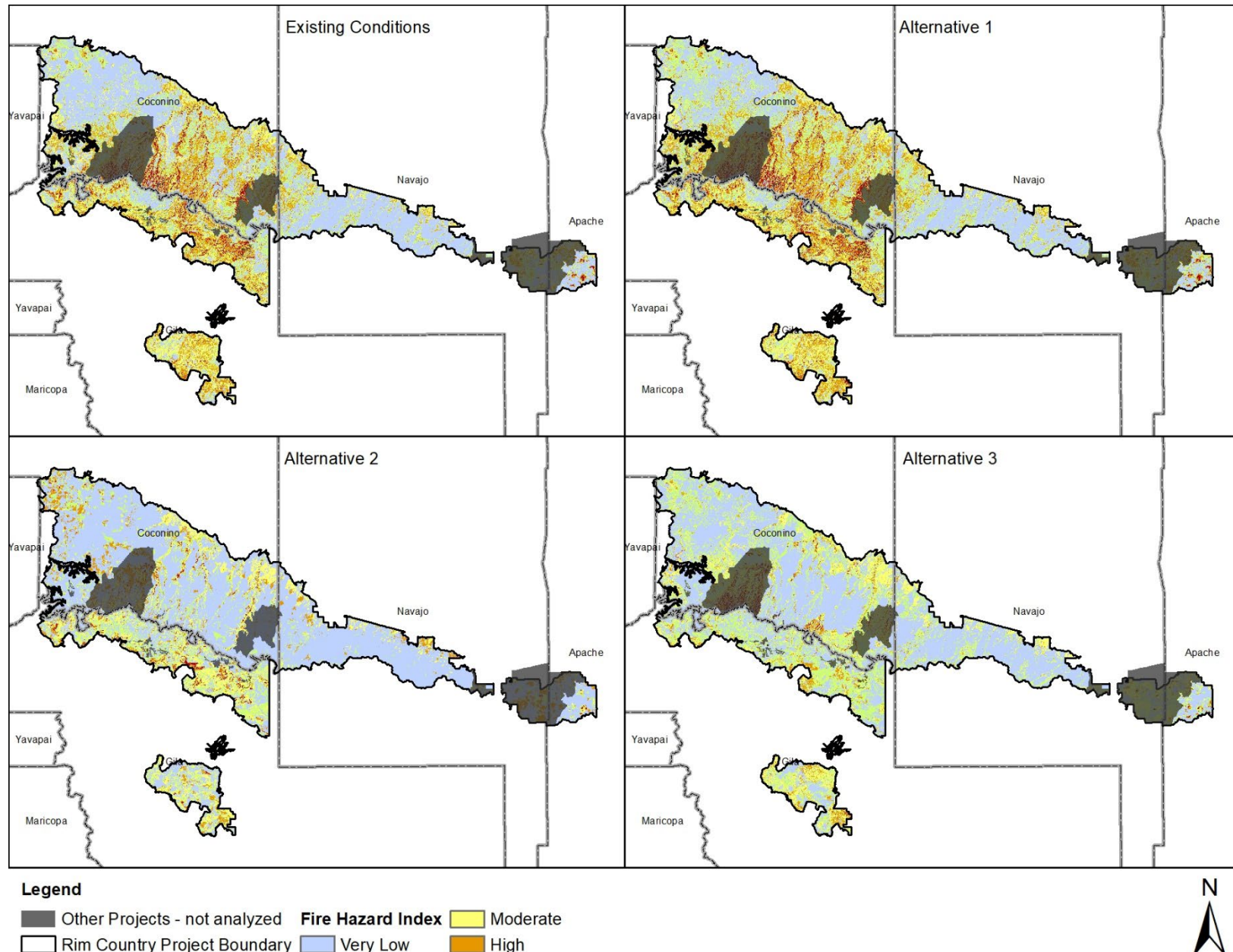


Table 21: Comparison of Alternatives by Fire Hazard Index for the Wildland Urban Interface Classes

| WUI Class | Total Acres | Very Low - Low | | | | Moderate | | | | High | | | | Very High | | | |
|-------------------------------|-------------|----------------|------|------|------|----------|------|------|------|------|------|------|------|-----------|------|------|------|
| | | ECs | Alt1 | Alt2 | Alt3 | ECs | Alt1 | Alt2 | Alt3 | ECs | Alt1 | Alt2 | Alt3 | ECs | Alt1 | Alt2 | Alt3 |
| Communication Sites | 13,333 | 67% | 64% | 83% | 83% | 13% | 14% | 9% | 11% | 18% | 19% | 8% | 5% | 2% | 3% | 0% | 1% |
| FS Buildings & Rec Residences | 10,548 | 62% | 60% | 82% | 83% | 11% | 11% | 8% | 9% | 21% | 23% | 9% | 7% | 5% | 6% | 0% | 1% |
| High Value Rec Sites | 5,581 | 64% | 61% | 85% | 79% | 9% | 9% | 11% | 13% | 21% | 22% | 3% | 7% | 7% | 8% | 1% | 1% |
| Non-FS Land with Structures | 144,691 | 66% | 63% | 79% | 86% | 16% | 16% | 14% | 11% | 16% | 18% | 7% | 3% | 3% | 3% | 1% | 0% |
| Transmission Lines | 28,885 | 66% | 63% | 79% | 82% | 16% | 15% | 12% | 13% | 15% | 17% | 8% | 4% | 3% | 4% | 1% | 1% |

Table 22: Comparison of Alternatives by Fire Hazard Index for each Vegetation Cover Type

| Vegetation Cover Type | Total Acres | Very Low - Low FHI | | | | Moderate FHI | | | | High FHI | | | | Very High FHI | | | |
|------------------------------|-------------|--------------------|------|------|------|--------------|------|------|------|----------|------|------|------|---------------|------|-------|------|
| | | ECs | Alt1 | Alt2 | Alt3 | ECs | Alt1 | Alt2 | Alt3 | ECs | Alt1 | Alt2 | Alt3 | ECs | Alt1 | Alt 2 | Alt3 |
| Ponderosa Pine | 642,198 | 78 % | 75 % | 90 % | 91 % | 8% | 7% | 6% | 7% | 12 % | 16 % | 4% | 2% | 2% | 2% | 0% | 0% |
| Ponderosa Pine/Evergreen Oak | 148,332 | 41 % | 36 % | 64 % | 77 % | 30 % | 33 % | 31 % | 17 % | 24 % | 26 % | 4% | 5% | 4% | 5% | 1% | 0% |
| Mixed Conifer/Frequent Fire | 52,723 | 30 % | 26 % | 79 % | 84 % | 18 % | 18 % | 13 % | 5% | 27 % | 29 % | 6% | 8% | 24 % | 27 % | 1% | 2% |
| Mixed Conifer with Aspen | 4,739 | 28 % | 24 % | 31 % | 45 % | 7% | 7% | 39 % | 17 % | 30 % | 32 % | 24 % | 22 % | 34 % | 37 % | 6% | 15 % |
| Aspen | 1,416 | 91 % | 91 % | 93 % | 95 % | 1% | 1% | 1% | 2% | 4% | 5% | 5% | 3% | 3% | 3% | 0% | 0% |
| Pinyon-Juniper Woodland | 135,062 | 38 % | 37 % | 49 % | 54 % | 33 % | 32 % | 33 % | 38 % | 26 % | 28 % | 16 % | 8% | 2% | 3% | 2% | 0% |
| Madrean Pinyon-Oak | 23,056 | 20 % | 19 % | 57 % | 40 % | 32 % | 33 % | 13 % | 27 % | 42 % | 41 % | 21 % | 33 % | 6% | 7% | 9% | 1% |
| Grassland/Meadow | 15,946 | 98 % | 98 % | 97 % | 98 % | 1% | 1% | 1% | 1% | 0% | 0% | 1% | 0% | 0% | 0% | 0% | 0% |
| Riparian | 13,050 | 73 % | 71 % | 76 % | 91 % | 11 % | 11 % | 17 % | 6% | 11 % | 13 % | 5% | 3% | 4% | 5% | 1% | 0% |

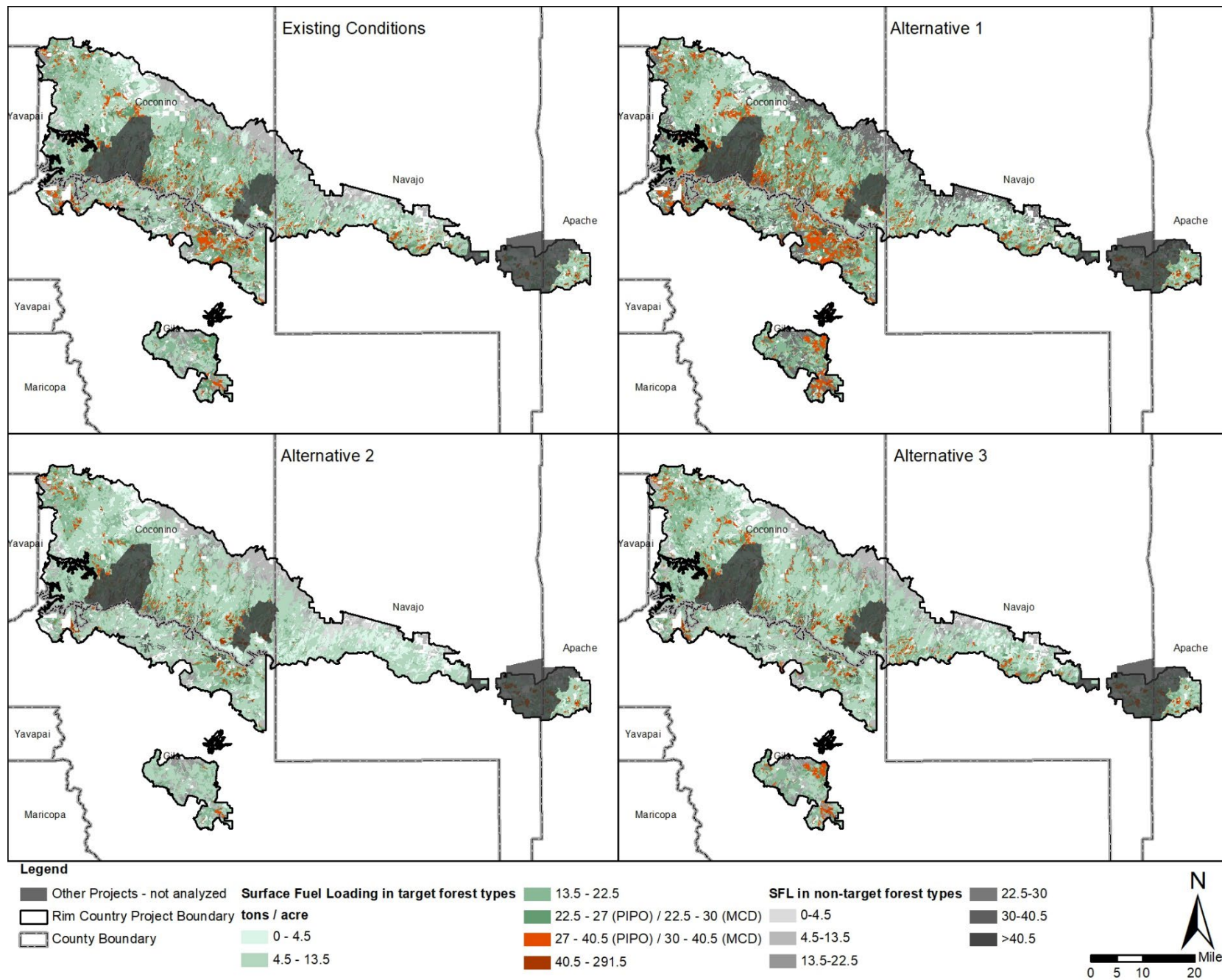


Figure 35: Comparison of Total Surface Fuel Loadings between Alternatives

Cumulative Effects Analysis

Cumulative effects related to fire ecology and air quality are incremental impacts of an alternative when added to the effects of other past, present, and reasonably foreseeable future actions. These include the effects of wildfire and vegetation management activities (mechanical treatments, & prescribed fire) on fire behavior and associated fire effects, including air quality.

Geographic Scope - Cumulative effects of wildfires and other projects are considered for the approximately 1.24-million-acre Rim Country project area.

Temporal Scope - This analysis primarily considered the past 10 years (2009-2018) of associated activities. This time period is based on recovery times and fuel accumulation rates associated with the ecological systems present in the Rim Country area. This analysis considered a 10-year time frame to reflect future and reasonably foreseeable activities at which time the majority of the actions proposed will have been completed.

For the Rim portion of the DEIS, the effects of wildfires and other project are considered for 1,238,658 acres project area. Prevailing winds during fire season generally have a western, southwestern, or southerly component to them, so fires burning adjacent to the western or southern border of the project area have a greater potential to burn into the project area than fires further away or in other directions. The USFS and the National Interagency Fire Center define 'large fires' as at least 300 acres in grass or shrub fuels, or at least 100 acres in timber (USDA 2014a). All fires included occurred from 2009 through 2018 and are at least 100 acres.

For the Environmental Consequences and Affected Environment analyses fire type, fire hazard index and surface fuel loading were evaluated for assessing movement towards desired conditions because they are indicators of potential fire behavior and effects, including air quality. Specific data are not available for many other projects. For projects included in this cumulative effects analysis, the treatments and the project objectives were considered as they relate to fire behavior and effects and air quality.

Past Actions: Wildfire

Nearly all area of the cumulative effects analysis area has been influenced or altered by past modifications to natural fire regimes as a result of fire suppression and livestock grazing. The culmination of these impacts over more than a century has resulted in the contemporary conditions found throughout the Rim Country project area. While the primary focus of this cumulative effects analysis focusses on the previous 10 years of wildfires and activities, it is important to note the role that past management has had on influencing this landscape and creating undesirable and unnatural conditions.

From 2009 – 2018, a total of 81 large wildfires burned within the project area, representing a total of 217,780 acres burned. Many of the wildfires that burned within the project area in the last 10 years were managed primarily for beneficial resource objectives (as opposed to being managed primarily for suppression objectives). These accounted for 38 wildfires totaling 126,310 acres burned within the project area. Other fires may have had some resource benefit management objectives as well, however the information needed to assess this is not readily available. The fire severity of the 38 wildfires managed primarily for resource benefit was mostly low and moderate. However, high severity fire has continued to occur within the Rim Country area. In the past 10 years, approximately 12,193 acres burned at high severity within the project area. The Tinder fire

(managed for suppression) burned with 27% (4,328 acres) high severity, and 33 homes were destroyed. The Highline fire (also managed for suppression) burned with 18% high severity. Post fire debris flows initiated in part from the Highline Fire claimed the lives of 10 people and caused significant damage to the watershed.

Past Actions: Vegetation Management Activities

Within the cumulative effects analysis area, there were approximately 164,232 acres of mechanical thinning and approximately 259,661 acres of prescribed fire acres within the past 10 years (Table 23).

Table 23. Acres of past, present and reasonably foreseeable projects with cumulative effects for fire, fuels and air quality.

| Treatment Type | Past Projects (approximate acres) | Current Projects (approximate acres) | Reasonably Foreseeable Projects (approximate acres) | Combined Past, Present and Reasonably Foreseeable Projects (approximate acres) |
|----------------------------------|-----------------------------------|--------------------------------------|---|--|
| Mechanical Vegetation Management | 164,232 | 417,551 | 124,434 | 706,217 |
| Prescribed Fire | 259,661 | 383,541 | 64,710 | 707,912 |
| Other Activities* | 51,072 | 40,379 | 93,147 | 184,598 |
| Totals | 474,965 | 841,471 | 282,291 | 1,598,727 |

***Other activities include but not limited to fuels chipping, range forage improvement or manipulation, range vegetation control, wildlife habitat improvement, tree encroachment control, tree release, fuels compaction, special products removal, insect control and prevention planting, fuel break creation, cultural site protection, scarification and seeding, pruning, and salvage.**

These past activities have, and will continue to moderate potential wildfire effects for the cumulative effects analysis area. This was demonstrated by the Upper Beaver Creek prescribed fires completed in 2013. These treatments allowed for the 2017 Snake Ridge wildfire to be managed for beneficial resource objectives, and influenced the final fire perimeter. Objectives of these projects include fuels reduction, maintenance burning, recreating historic stand conditions in PJ (mixed severity), and reducing the risk of stand replacement fire and the rate of spread, intensity, and severity of wildfires that do occur.

Vegetation treatments and wildfires near, adjacent to, and within the project area have contributed to shaping the existing vegetation conditions for the treatment area with prescribed fire and/or mechanical treatments. Within the project area, near, adjacent to, or within the treatment area, 23 projects were completed within the last 10 years that included mechanical thinning and/or prescribed burning acres (Table 24) and these have, or may, affect potential fire behavior and effects within the treatment area.

In general, the past management actions have decreased the potential for active crown fire, crown fire initiation and high severity fire effects on the acres treated and/or burned by wildfire. Across the cumulative effects analysis area other projects have affected vegetation in similar ways to those described under this project's alternatives, though there are some variations in treatments, particularly for the older fuels treatments. Past mechanical and prescribed fire treatments have

decreased the potential for crown fire by breaking up the vertical and horizontal continuity of canopy fuels. Prescribed fire and low severity wildfires further decreased the potential for crown fire, by removing additional ladder fuels, decreasing canopy bulk density, and raising canopy base height. Maintenance burning and wildfires decreased surface fuel loading in most areas burned, decreasing the potential intensity of subsequent fires in those locations.

Table 24: Past Vegetation Management Activities

| Project Name | Year | Mechanical | Prescribed Fire | Other Activities* | Forest |
|---|------|------------|-----------------|-------------------|-------------------|
| Bruno Thinning and Slash | 2009 | 0 | 70 | 0 | Apache-Sitgreaves |
| Whitcom WUI | 2009 | 925 | 0 | 0 | Apache-Sitgreaves |
| Hilltop II Fuels reduction | 2011 | 0 | 799 | 616 | Apache-Sitgreaves |
| Rodeo-Chediski Site Prep for Reforestation (#48660) | 2016 | 0 | 0 | 0 | Apache-Sitgreaves |
| Show Low South (#29987) | 2011 | 3372 | 0 | 0 | Apache-Sitgreaves |
| Rodeo-Chediski Fire RX Burn | 2012 | 0 | 9506 | 14832 | Apache-Sitgreaves |
| Timber Mesa/Vernon WUI | 2012 | 18781 | 39760 | 20441 | Apache-Sitgreaves |
| Rim Lakes Forest Restoration | 2016 | 12483 | 1335 | 6447 | Apache-Sitgreaves |
| Section 31 Fuels Restoration | 2017 | 44 | 0 | 0 | Apache-Sitgreaves |
| Larson Forest Restoration | 2015 | 1867 | 0 | 2516 | Apache-Sitgreaves |
| Upper Rocky Arroyo Restoration | 2016 | 696 | 5411 | 3960 | Apache-Sitgreaves |
| Post Tornado Resource Protection and Recovery | 2011 | 765 | 0 | 0 | Coconino |
| Lake Mary Road ROW Clearing (ADOT) | 2016 | 788 | 0 | 0 | Coconino |
| Upper Beaver Creek Watershed Fuel Reduction | 2010 | 20608 | 64000 | 0 | Coconino |
| Blue Ridge Community Fire Risk Reduction | 2012 | 0 | 45000 | 0 | Coconino |
| Clints Well Forest Restoration | 2013 | 11 | 6639 | 0 | Coconino |
| Hutch Mountain communication site | 2017 | 1 | 0 | 0 | Coconino |
| Parallel Prescribed Burn | 2014 | 0 | 4759 | 0 | Tonto |
| Cherry Prescribed Burn | 2012 | 0 | 6582 | 0 | Tonto |
| Myrtle WUI | 2012 | 103891 | 75800 | 1835 | Tonto |
| Pierce Reforestation | 2009 | 0 | 0 | 406 | Apache-Sitgreaves |
| Rodeo-Chediski Riparian Planting | 2010 | 0 | 0 | 1 | Apache-Sitgreaves |
| long Valley work center meadow restoration | 2018 | 0 | 0 | 18 | Coconino |

*Other activities include but not limited to fuels chipping, range forage improvement or manipulation, range vegetation control, wildlife habitat improvement, tree encroachment control, tree release, fuels compaction, special products removal, insect control and prevention planting, fuel break creation, cultural site protection, scarification and seeding, pruning,

Air Quality

Past treatments and wildfires have decreased the potential emissions by removing canopy fuels, mostly from thinning, but some from wildfire and prescribed fire. Low to Moderate severity fire would have consumed surface fuels, further decreasing potential for emissions on about 205,587 acres. Where wildfires burned with high severity (~12,193 acres in and adjacent to the project area), fine canopy fuels (needles and small twigs) were consumed leaving tree stems and branches, some of which have fallen and are now Coarse Woody Debris which have the potential to smolder for days, or weeks.

Cumulative Effects – Present and Reasonably Foreseeable Actions

Acres of current, ongoing, and foreseeable projects within the Rim Country project area are shown in Table 62. They include 448,251 acres of prescribed fire and 541,985 acres of mechanical vegetation management. Some of these projects are in the early stages of proposal development or are on hold, so their implementation is reasonably foreseeable but not assured. The acreages shown under mechanical vegetation management and fuels treatments are not all mutually exclusive. There are many acres on which proposed fuels treatments (mechanical and prescribed fire) overlap with proposed mechanical vegetation management treatments.

Table 62. Approximate Acres of Current, Ongoing, and Reasonably Foreseeable Vegetation Management Activities within the Project Area.

| Treatment | Treatment Type | Current Projects Approximate Acres | Reasonably Foreseeable Projects Approximate Acres |
|---|--|---|--|
| | Thinning -Habitat Improvement | 89,579 | 10,975 |
| Mechanical Vegetation Management | Thinning – Fuels Reduction Emphasis | 114,570 | 41,046 |
| | Thinning – Restoration Emphasis | 53,578 | 285 |
| | Savanna/Grassland Restoration | 0 | 39,000 |
| | Salvage | 5,678 | 0 |
| | Range Cover Manipulation | 34,701 | 54,147 |
| | Powerline Hazard Tree Removal and Right of Way | 4,580 | 22,963 |
| Total Mechanical: | | 302,686 | 168,416 |
| Fuels Treatments (With Mechanical) | Mechanical Fuels Treatment | 155,244 | 49,165 |
| | Pile and Burn | 133,168 | 5,070 |
| | Broadcast Burn | 250,373 | 59,640 |
| Total Fuels Treatments | | 538,175 | 113,875 |

Alternative 1

Effects of the Alternative

Alternative 1 would continue to maintain 977,656 acres with increasing potential for high severity fire effects and behavior, though the effects would be mitigated to some degree by current and reasonably foreseeable projects, and any beneficial wildfires that may occur in the future. Alternative 1 would not contribute to improving the structure, composition, and patterns within

the area proposed for treatment.

Effects of Other Actions

Fuel treatments have been, and continue to be implemented in WUI closest to major population centers, but much of the landscape is still vulnerable to undesirable fire behavior and effects, including changes in site productivity, loss of critical habitat, flooding, erosion, weed infestations, damaged infrastructure, and the longer-term effects of having thousands of acres of dead trees nearby for decades.

Within the area considered for cumulative effects for fire ecology and air quality, other actions will contribute to some improvement in landscape conditions. However, these improvements would be much less than those predicted for the action alternatives. Improvements would be primarily localized, within individual project boundaries, and collectively do less to move the broader landscape towards desired conditions. Alternative 1 would lead to less spatial continuity between treatments when compared to the action alternatives. At the landscape scale, it would not put the ponderosa pine and associated vegetative systems on trajectories towards being resilient or sustainable.

Cumulative Effects

Under Alternative 1, the treatment area would continue develop unnatural densities and fuel loading, increasing the potential for undesirable fire behavior and effects when wildfires occur. When fires did occur, many would have potential for extreme fire behavior and could produce large areas of high severity fire effects. These impacts could extend well outside of the treatment area as fires that start within the proposed treatment area may pose difficulties for control and spread to adjacent lands. Many fires starting within the untreated project area would have potential to spread outside of the treatment area. Increased potential for extreme fire behavior would put lives, property, infrastructure, and natural resources at risk. Effects would also extend well beyond the perimeters of the fire, and would include such effects as flooding, debris flow, sedimentation, decreased water quality and quantity, decreased soil productivity, and other effects of fires burning out of their natural range of variation.

Fire Type

For those areas treated under the past, present and reasonably foreseeable actions, there would be a decrease in potential crown fire. However, the majority of the landscape would remain susceptible to crown fire and associated fire related impacts under Alternative 1.

Fire Hazard Index

Similar to fire type, reductions in fire hazard index are anticipated for areas treated under past, present and reasonably foreseeable actions. While beneficial, these reductions are not sufficient to mitigate the high fire hazard index ratings across the majority of the landscape.

Surface Fuels

Some reductions in surface fuels are anticipated, associated with the areas treated by past, present and reasonably foreseeable actions. However, for much of the cumulative effects analysis area, unnatural levels of surface fuels will continue to build up. When wildfires do occur in these areas of increased surface fuels, additional consumption and associated emissions are expected.

Alternative 2

Effects of the Alternative

As described in the direct and indirect effects section, treatments proposed in Alternative 2 would move considerable acres toward desired conditions for fire behavior and associated fire effects across the project area.

Effects of Other Actions

Fuel treatments have been, and continue to be implemented in the WUI, closest to major population centers.

Within the area considered for cumulative effects for fire ecology and air quality, other actions will contribute to improvements in landscape conditions. Improvements include localized reductions in crown fire potential, decreases in fire hazard index values, and reduced levels of surface fuels.

Cumulative Effects

When considered with past wildfires, and past, ongoing, and reasonably foreseeable management activities, this alternative would augment the effects of proposed treatments at multiple scales, creating mosaics of potential fire behavior and effects, dominated by low severity fire. The proposed treatments would fill in most of the acres between past, current, ongoing, and foreseeable management activities, creating a more cohesive, contiguous, restored landscape across the project area.

Where past, present and foreseeable wildfires and treatments occur close to treatments proposed in the action alternatives, they serve to augment the moderating effect that the change in fuel structure is predicted to have on wildfires moving through the area by decreasing the acres where high severity fire effects are likely to occur. These combined activities also serve to augment the potential size and locations of burn units for the action alternatives because the moderated fire behavior in burned and/or thinned areas allow prescribed fire to be implemented with broader burn windows and higher intensity fire (if desired) while still meeting control and resource objectives.

Fire Type

Alternative 2 reduces crown fire potential under extreme fire weather conditions from 31% under current conditions to 12% within areas proposed for treatment. This reduction, combined with the past, ongoing, and reasonably foreseeable management activities would cumulatively reduce the overall landscape susceptibility to crown fire. When added to other treatments in the cumulative effects area alternative 2 provides for greater connectivity of treated landscapes resulting and the largest overall reduction in crown fire potential as contrasted with alternative 3. As a result, under moderate burning conditions, the majority of the landscape is projected to support surface fire. These cumulative effects provide the biggest improvement of all alternatives in overall firefighter and public safety while allowing fire to play a more natural role across the landscape, and provide opportunities to manage fires for resource benefits across a broader landscape.

Fire Hazard Index

This alternative provides for a significant reduction in moderate to extreme Fire Hazard Index (FHI) ratings, reducing the total area in these categories to 15% of the project area from 37%.

When combined with past, ongoing, and reasonably foreseeable management activities, this alternative provides for additional improvements in FHI over the full cumulative effects analysis area.

Surface Fuels

Cumulative effects on surface fuels under alternative 2 provide for the greatest overall reduction in surface fuels. Cumulatively, this alternative will lead to a reduction in unnatural levels of surface fuels that have built up over time. When wildfires do occur in these areas of reduced surface fuels, consumption and associated emissions are expected to be lower than they would have been without the combined treatments.

Alternative 3

Effects of the Alternative

As described in the direct and indirect effects section, treatments proposed in Alternative 3 would move considerable acres toward desired conditions for fire behavior and associated fire effects across the project area.

Effects of Other Actions

Fuel treatments have been, and continue to be implemented in the WUI, closest to major population centers.

Within the area considered for cumulative effects for fire ecology and air quality, other actions will contribute to improvements in landscape conditions. Improvements include localized reductions in crown fire potential, decreases in fire hazard index values, and reduced levels of surface fuels.

Cumulative Effects

Fire Type

Alternative 3 reduces crown fire potential under extreme fire weather conditions from 31% under current conditions to 18% within areas proposed for treatment. This reduction, when combined with the past, ongoing, and reasonably foreseeable management activities will serve to reduce the overall landscape susceptibility to crown fire. Cumulatively alternative 3 when combined with prescribed fire from other projects provides for less connectivity of treated landscapes, though portions of areas not proposed for treatment remain susceptible to crown fire. As with Alternative 2, under moderate burning conditions, the majority of the landscape is projected to support surface fire. The cumulative effects will improve overall firefighter and public safety while allowing fire to play a more natural role across the landscape, and provide opportunities to manage fires for resource benefits across a broader landscape, though to a lesser degree than alternative 2. .

Fire Hazard Index

This alternative provides for a significant reduction in moderate to extreme FHI ratings, reducing the total area in these categories to 22% of the project area from 37%. When combined with past, ongoing, and reasonably foreseeable management activities, this alternative provides for additional improvements in FHI over the cumulative effects analysis area.

Surface Fuels

Cumulative effects on surface fuels under alternative 3 provide for considerable reduction in surface fuels. Cumulatively, this alternative will lead to a reduction in unnatural levels of surface fuels that have built up over time. However, areas left untreated will continue to accumulate unnatural fuel loading, and when wildfires do occur in these areas, elevated consumption and associated emissions are expected.

Effects from Adaptive Management Activities

All alternatives assume the use of adaptive management principles. Forest Service decisions are made as part of an on-going process, including planning, implementing projects, and monitoring and evaluation. All Forests' Land Management Plans identify monitoring programs. Monitoring the results of actions would provide a flow of information that may indicate the need to change a course of action or amend either the Land Management Plans, the Rim Country EIS, or both. Scientific findings and the needs of society may also indicate the need to adapt resource management to new information. Forest Supervisors annually evaluate monitoring information displayed in evaluation reports through a management review and determine if any changes are needed in management actions or the documents themselves. In general, annual evaluations of the monitoring information consider the following questions:

- What are the effects of resource management activities on the health and condition of the land in regards to potential fire behavior and effects?
- To what degree are resource management activities maintaining or making progress toward the desired conditions and objectives for the plan?
- What changes are needed to account for unanticipated changes in conditions?

Recommended adaptive management actions for transportation, springs and roads were reviewed. None of the recommended management actions would conflict with desired conditions and proposed actions for Fire Ecology/Fuels/Air Quality.

Monitoring

Monitoring would be a critical component in the success of the Rim Country. Fulé and Laughlin (2007) stated: "Ecological restoration can be criticized because future climate conditions will not be like those of the past (Millar & Wolfenden 1999). However, the issue is not whether future climates will be unchanging, they will not, but rather whether native forest ecosystems can persist under future conditions. Climate change, whether through gradual changes or greater extremes which affect disturbance severity, may create novel thresholds beyond which a species or ecosystem type cannot survive (Malcolm et al. 2002). But unless or until such a point is reached, **the most relevant question for assessing restoration is sustainability** (Clewett 2000)."

When choosing what to monitor, there should be a balance of the measures used to 1) evaluate the post-treatment condition of the treatment area and the treated areas in regards to potential fire behavior and potential fire effects and; 2) those that can provide information about the sustainability of management actions based on current and expected fire effects. Questions to be answered by monitoring include:

- How many acres (or percent of the landscape or vegetation type) burned with fire behavior

that produced the desired fire effects? If monitoring data show treated areas do not meet desired conditions, there would be a re-evaluation of treatments to determine what changes are needed. Evaluation could be based on such things as burn severity (fire effects on soil), mortality of desirable species (such as large and/or old ponderosa pine, and large Gambel oak), and the response of surface vegetation for several years following treatments and/or wildfire.

- Were the logistics and operations implementable at the desired spatial and temporal scales? If, after 5 years of implementation, the necessary acres are not being treated with prescribed fire and/or the trend in average acres burned indicates they would not be, there would need to be a re-evaluation of limitations to determine what changes would be needed to meet objectives for prescribed fire.

Discussion of Literature

Over the last several years, there have been a series of publications with different conclusions about the role of fire in ponderosa pine forests in Arizona. Williams and Baker compiled a large set of historical data that consists of records made by land surveyors for the General Land Office (GLO) in the late 1800s and early 1900s. Surveyors marked trees around corner points that delineated square miles and quarter-miles, sometimes making additional comments about the country they were walking through. This research provided new data in the form of estimates of forest density, species, and diameters of trees at the time of the survey (Williams and Baker 2012). Based on the density and size class data, they devised a method for determining past fire regimes, concluding that the proportion of high-severity fire in recent fires was less than or similar to the proportion in historical fires (Williams and Baker 2012). They also concluded that, historically, high severity fire was more prevalent across the ponderosa pine in Arizona than had been indicated by previous research (cited elsewhere in this report). Williams and Baker (2012) calculated that the historical fire regime in ponderosa pine forests on the Mogollon Plateau included 62.4% of the area had evidence of only low-severity fire, 23.1% of the area with mixed-severity fire, and 14.5% of the area with high-severity fire (Williams and Baker 2012). They also concluded that the historical fire rotation for high-severity fire was 828 years across the Mogollon Plateau, thus these fires were infrequent. Williams and Baker (2013) calculated the historical fire regime in ponderosa pine forests on the Coconino Plateau included 58.8% of the area with evidence of only low-severity fire, 38.7% of area with mixed severity fire, and 2.5% of area with high-severity fire (Williams and Baker 2013, Table 2). Fulé et al. (2013) responded with concerns about Williams and Baker's (2012) methods and conclusions about high severity fire.

There is some variability in historic reports of fire severity across the landscape, even from single sources, which can be difficult to interpret. For example, in discussing ponderosa pine forests, Leiberg et al. 1904 (p. 23) say: "It is very evident that the yellow-pine stands, even where entirely untouched by the ax, do not carry an average crop of more than 40 per cent of the timber they are capable of producing...conditions are chiefly attributable to the numerous fires which have swept over the region within the last two hundred years, carrying with them the inevitable consequences of suppression and destruction of seeding and sapling growth...". They also said: "The light stands in many cases represent tracts which were burned clear, or nearly so, one hundred or one hundred and twenty years ago, and now are stocked chiefly with sapling growths, ranging in age from 35 to 90 years."

In evaluating the available research that is specific to fire regimes in ponderosa pine in Arizona and the project area, many people feel that ecological, social, and economic values are not consistent with the pre-restoration disturbance regime of large, high severity fires, especially under changing climate. However, ecological restoration in the project area will lead to a restored fire regime with historical levels of low, mixed, and high-severity fire, even if the details of the historical levels remain under on-going study.

Additional publications have been produced in response, and this is expected to be an area of ongoing discussion in the literature. However, in evaluating the majority available research that is specific to fire regimes in ponderosa pine in Arizona and the project area, the preponderance of scientific evidence indicates that the restoration of ponderosa pine in northern Arizona the ecological, social and economic value is not consistent with a present-day disturbance regime of large, high severity fires, especially under changing climate (Fulé et al. 2013).

. Ponderosa pine has distinct variations within its geographic range (Oliver and Ryker 1990), and the populations of ponderosa pine in northern Arizona have some fundamental genetic differences from pines in other areas within the range of *Ponderosa* species (Conkle and Critchfield 1988). There are differences in the openness of crown growth, number of needles, and other characteristics. These two populations should not be expected to have identical fire regimes, even if the study was restricted to ponderosa pine.

Ecosystem restoration treatments are often designed to recreate presettlement fire regimes, stand structures and species compositions while fuel treatment objectives are primarily to reduce fuels to lessen fire behavior or severity—this is known as ‘hazard reduction (Reinhardt et al. 2008).

Finney (2001, 2007), and Finney et al. (2007) focused on ‘fuels management’, which is useful for managing fire behavior when that is the primary concern. However, treating only 20% of the landscape, which Finney has shown can be effective in managing fire behavior, would not achieve restoration on a landscape scale. An analysis that focuses on where treatments would best minimize fire behavior may or may not be support restoration objectives across the landscape (which includes conservation of large and old trees, enhancing large oak, enhancing aspen clones, and other treatments).

Glossary (including acronyms)

PAC: Protected activity center for the Mexican Spotted Owl (habitat type)

PFA: Post-fledgling Family Areas for Goshawks (habitat type)

Active crown fire: a fire in which a solid flame develops in the crowns of trees, but the surface and crown phases advance as a linked unit dependent on each other.

Adaptive Management: a type of planning and implementation that incorporates the results of prior actions, new scientific findings, and changing societal needs into constantly evolving conservation goals and practices. This management style requires monitoring of baseline ecological data as well as the results of ongoing activities and the solicitation of public needs. Under adaptive management, plans and activities are treated as working hypotheses rather than final solutions to complex problems. The process generally includes four phases: planning, implementation, monitoring, and evaluation. The level of success of this process is dependent upon the participation of critical stakeholders.

Biomass: multiple definitions include: organic matter produced by plants and other photosynthetic organisms; total dry weight of all living organisms that can be supported at each level of a food chain or web; dry weight of all organic matter in plants and animals in an ecosystem; plant materials and animal wastes that functions as fuel for fire.

Burn: an effect produced by heating. To undergo combustion, consuming fuel and giving off light, heat and gasses. Also, an area where fire has occurred in the past.

Canopy Base Height (CBH): The lowest height above the ground at which there is a sufficient amount of canopy fuel to propagate fire vertically into the canopy (Scott and Reinhardt 2001). Canopy base height is a value that describes ‘ladder fuels’, such as understory trees, the lower branches of mature trees, or shrubs and/or herbaceous vegetation sufficient to produce a fire of high enough intensity to initiate crown fire. The lower the canopy base height, the easier is for crown fire to initiate (Van Wagner 1977), because shorter flame lengths may be sufficient to ignite the canopy. Continuity of canopy base height across a forest or a stand is not necessary to initiate crown fire, technically, a single ladder fuel is sufficient.

Canopy Bulk Density (CBD): The mass of available canopy fuel per unit volume. It is a bulk property of a stand of trees, not individual trees (Scott and Reinhardt 2001). The greater (higher) the canopy bulk density is, the harder it is to see the sky through the canopy when you’re looking up through it. The higher the canopy bulk density, the more easily fire can move through the crowns of trees, and the more fuel there is to burn, influencing fire intensity as well, so that greater flame lengths and radiant heat are more likely to carry fire through the canopy.

Canopy Cover: as used in modeling fire, is the horizontal fraction of the ground that is covered directly overhead by tree canopy, the percent of vertically projected canopy cover in the stand (Scott and Reinhardt 2005).

Condition Class: A measure of departure from reference conditions that can be used to determine how ‘at risk’ key ecosystem components are in the event of a disturbance event, such as fire.

Conditional crown fire: a crown fire that is dependent on ladder fuels in adjacent stands in order

-
- for fire to access the crowns. In an area with conditional crown fire, ladder fuels are insufficient in a stand for crown fire to initiate, but canopy fuels are sufficient to support crown fire if it moves in from an adjacent stand.
- Controlled burn:** synonymous with Prescribed Fire.
- Crown fire:** a fire that advances from top to top of trees or shrubs more or less independent of a surface fire. Crown fires are sometimes classed as independent, conditional, or dependent (active or passive) to distinguish the degree of independence from the surface fire. Crown fires are common in coniferous forests and chaparral shrublands.
- Disturbance:** any relatively discrete event or series of events—either natural or human-induced—that causes a change in the existing condition of an ecosystem, community, or population structure and alters the physical environment.
- Disturbance Regime:** a set of recurring conditions due to a variety of disturbances (e.g., fire, flooding, insect outbreak) and their interaction, which characterize an ecosystem within a historic, natural or human induced context, within a given climate. This set of recurring conditions includes a specific range for each of the attributes of these disturbances. These attributes include: frequency, rotation period, intensity, severity, seasonality, patch size and distribution, residual structure, causal agent, the relative influence of each causal agent and how they interact. The attributes researchers choose to represent a regime will vary depending on a researcher's area of interest (Skinner and Chang 1996). An accurate description of a disturbance regime must include the full range of disturbance events, including those that are rare.
- Drought:** periods of abnormally dry weather sufficiently long enough to cause a serious hydrological imbalance. Drought is a relative term; therefore any discussion in terms of precipitation deficit must refer to the particular precipitation-related activity that is under discussion. For example, there may be a shortage of precipitation during the growing season resulting in crop damage (agricultural drought), or during the winter runoff and percolation season affecting water supplies (hydrological drought).
- Duff:** the fermentation and humus layer lying below the litter layer and above mineral soil; consisting of partially decomposed organic matter whose origins can still be visually determined, as well as the fully decomposed humus layer. This layer does not include the freshly cast material in the litter layer, nor in the post-burn environment, ash (Brown 2000). The top of the duff is where needles, leaves, fruits and other castoff vegetative material have noticeably begun to decompose. Individual particles usually are bound by fungal mycelia. The bottom of the duff is mineral soil. There is a gradient, not a clear division between litter and duff.
- Ecological Process:** events or combinations of events (including ecological disturbances and perturbations) that occur in natural environments within a range of conditions and cause a range of dynamic effects on the structure, composition, and functioning of ecosystems
- Ecosystem:** a biotic community and its surroundings, part inorganic (abiotic) and part organic (biotic).
- Erosion:** the wearing away of the land surface by rain or irrigation water, wind, ice, or other natural or anthropogenic agents that abrade, detach and remove geologic parent material or soil from one point on the earth's surface and deposit it elsewhere.

Fire: rapid oxidation, usually with the evolution of heat and light; heat fuel, oxygen and interaction of the three. We generally recognize two basic kinds of fire: structure fires and wildland fires.

Fire Adapted Ecosystem: an associated group of plant and animals that have made long term genetic changes in response to the presence of fire in their environment.

Fire Ecology: the study of fire's interaction with ecosystems.

Fireline Intensity: rate of heat release in the flaming front. A quantitative measure of fire behavior that is a measure of the fire itself (not it's effects). Indicators include flame length, flame height, peak temperatures, energy output/time, scorch height (as in indicator of flame height) .

Fire Regime: a set of recurring fire conditions that characterize an ecosystem, within a historic, natural or human induced context, within a given climate. This set of recurring conditions includes a specific range of attributes: Sugihara et al. (2006) uses the following attributes: seasonality, frequency (fire return interval), intensity, severity, size, spatial complexity, and fire type. An accurate description of a fire regime will include the full range of fire events, including those that are rare and connect to the larger disturbance regime which contains the fire regime as a subset.

Fire Return Interval: the number of years between two successive fires in a designated area (i.e., the interval between two successive fires); the size of the area must be clearly specified (McPherson and others 1990).

Fire Severity A qualitative evaluation of immediate effects produced by the heat pulse on the biotic and abiotic components of an ecosystem. Indicators include the amount of biomass consumed, changes in the amount of mineral soil exposed, soil color, top-killed surface vegetation.

Fire Type: flaming front patterns that are characteristic of a fire.

First Order Fire Effects: effects resulting directly from the fire, such as fuel consumption and smoke production.

Flame Length: the length of flames in the propagating fire front measured along the slant of the flame from the midpoint of its base to its tip.

Fuel Continuity: a qualitative description of the distribution of fuel, both horizontally and vertically. Continuous fuel supports fire spread better than discontinuous fuel. See Fuel.

Fuel Load: weight of fuel per unit area. See Fuel.

Fuel: living and dead vegetation that can be ignited.

Fuel Type: an identifiable association of fuel elements of distinctive species, form, size, arrangement, or other characteristics that will cause a predictable rate of spread, or resistance to control under specified weather conditions.

Ground fire: fire that burns in the organic material below the litter layer, mostly by smoldering combustion. Fires in duff, peat, dead moss and lichens, and partly decomposed wood are typically ground fires.

Habitat: place where an animal or plant normally lives, often characterized by a dominant plant

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- form or physical characteristic. Often described for individual species, e.g., spotted owl habitat, it is usually used as a generalization of where an animal may live.
- Hazard:** A fuel complex, defined by volume, type, condition, arrangement, and location that determines the degree of ease of ignition and the resistance to control. The state of the fuel, exclusive of weather or the environs in which the fuel is found (NWCG 2003, Hardy 2005).
- Historic Range of Variation (HRV):** refers to ecosystem composition, structure, and process for a specified area and time period. Historic range of variation (HRV) is often used to determine our best estimate of “natural” conditions and functions, and thus is often our best estimate of the natural range of variation (NRV). Ecosystems change over time. It is assumed that native species have adapted over thousands of years to natural change and that change outside of NRV may affect composition and distribution of species and their persistence.
- Invasive:** any species which can establish, persist, and spread in an area, and be detrimental or destructive to native ecosystems, habitats, or species and difficult to control or eradicate.
- Ladder Fuel:** fuel, such as branches, shrubs or an understory layer of trees, which allow a fire to spread from the ground to the canopy.
- Landscape Pattern:** the term for the contents and internal order of a diverse area of land. These include the number, frequency, size, and juxtaposition of landscape elements, such as corridors and patches, which are important to determine or interpret ecological processes.
- Land Resource Management Plan (LRMP):** a document prepared with public participation and approved by an agency administrator that provides general guidance and direction for land and resource management activities for an administrative area. The L/RMP identifies the need for fire’s role in a particular area and for a specific benefit. The objectives in the L/RMP provide the basis for the development of fire management objectives and the fire management program in the designated area.
- Litter:** the top layer of the forest, shrubland or grassland floor above the duff layer, including freshly fallen leaves, needles, bark, flakes, fruits (e.g., acorns, cones), cone scales, dead matted grass, and a variety of accumulated dead organic matter which is unaltered, or only slightly decomposed. This layer typically does not include twigs and larger stems. One rough measure to distinguish litter from duff is that you can pick up a piece of litter and tell what it was (a leaf or leaf part, a needle, etc.). Duff is generally not identifiable. There is a gradient, not a clear division between litter and duff.
- Monitoring:** a systematic process of collecting and storing data related to natural systems at specific locations and times. Determining a system’s status at various points in time yields information on trends, which is crucial in detecting changes in systems.
- Mosaic:** the spatial arrangement of habitat where there is stand heterogeneity - measured at many spatial scales from the patch, the stand, and the vegetative community.
- National Environmental Policy Act (NEPA):** the environmental law passed by the U. S. Congress in 1969 that requires the preparation of specific environmental documentation for major undertakings using federal funds. Public involvement is an integral component of this process.

Native: a species which is an indigenous (originating where it is found) member of a biotic community. The term implies that humans were not involved in the dispersal or colonization of the species.

Objective: a defensible target or specific component of a goal, whose achievement represents measurable progress toward a goal. Thus an objective needs to be a clear, measurable and attainable refinement of a goal, which you intend to achieve within a stated time-period. Objectives need to be concise statements of what we want to achieve, how much we want to achieve, when and where we want to achieve them, and who is responsible for the work. Objectives provide the basis for determining strategies, monitoring accomplishments, and evaluating success. Goals usually have more than one objective.

Passive crown fire: a fire in the crowns of the trees in which trees or groups of trees torch, ignited by the passing front of the fire. The torching trees reinforce the spread rate, but these fires are not basically different from surface fires.

Percentile weather: For a given weather parameter (such as temperature, wind speed, relative humidity, precipitation, etc.,) the percent of days in a year that fall below it. For example, if the 90th percentile temperature for a given location is 90°F, it means that for 90% of days in a year, the temperature is lower than 90°F.

Pile burning: Activity fuels, once piled by machine or by hand, are burned in place.

Planned Ignition: the intentional initiation of a wildland fire by hand-held, mechanical or aerial device where the distance and timing between ignition lines or points and the sequence of igniting them is determined by environmental conditions (weather, fuel, topography), firing technique, and other factors which influence fire behavior and fire effects (see prescribed fire).

Prescribed Fire: is a wildland fire originating from a planned ignition to meet specific objectives identified in a written, approved, prescribed fire plan for which NEPA requirements (where applicable) have been met prior to ignition (see planned ignition).

Protection: the actions taken to limit the adverse environmental, social, political, and economical effects of fire.

Reference Condition: a range of conditions (found in the present or the past) against which the effects of past and future actions can be compared. These states can provide an explicit, historically-based context for comparing different management effects. Examples include periods before fire suppression or the arrival of an invasive species, or a similar but “healthier” modern ecosystem. Ideally these environmental conditions are based on functioning ecosystems where natural ecosystem structure, composition, and function are operating with limited human intervention (very minor human-caused ecological effects).

Residence Time: time required for the flaming front of a fire to pass a stationary point at the surface of the fuel. The length of time the flaming front occupies one point; relates to downward heating and fire effects below the surface.

Resilience: the ability of an ecosystem to maintain the desired condition of diversity, integrity, and ecological processes following disturbance. The ability of a system to absorb or recover from disturbance and change, while maintaining its functions and services.

Response to wildland fire - the mobilization of the necessary services and responders to a fire

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- based on ecological, social, and legal consequences, the circumstances under which a fire occurs, and the likely consequences on firefighter and public safety and welfare, natural and cultural resources, and values to be protected.
- Risk:** In the context of technical risk assessments, the term “risk” considers not only the probability of an event, but also includes values and expected losses. Within wildland fire, ‘risk’ refers only to the probability of ignition (both man- and lightning-caused) (Hardy 2005).
- Seasonality:** the timing of a fire during the year or the period/ of the year during which fires are likely to start and spread—seasonal component of a fire regime.
- Second Order Fire Effects:** the secondary effects of fire such as tree regeneration, plant succession, and changes in site productivity. Although second order fire effects are dependent, in part, on first order fire effects, they also involve interaction with many other non-fire variables, e.g. weather.
- Seed Bank:** the community of viable seeds present in the soil.
- Seral Stage:** a transitory or developmental stage of a biotic community in an ecological succession (does not include structural seral stage).
- Severity:** the quality or state of distress inflicted by a force. The degree of environmental change caused by a disturbance, e.g. Fire.
- Soil Heating:** an increase in soil temperature as a result of heat transfer from the combustion of surface fuel and smoldering combustion of organic soil horizons. Because of the variability of fuel consumption, soil heating is typically variable across landscapes. In many cases, the highest soil temperatures are associated with high fuel consumption and/or complete duff consumption. Under these circumstances, the duration and intensity of burning are affected.
- Soil Texture:** description of soil composition based on of sand, silt, and clay.
- Stakeholder:** any individual, group, or institution that has a vested interest (financial, cultural, value-based, or other) in the conservation, management and use of a resource and/or might be affected by management activities and have something to gain or lose if conditions change or stay the same. Stakeholders are all those who need to be considered in achieving project goals and whose participation and support are crucial to its success. Stakeholders can be internal (work for the management unit) or external.
- Succession:** the sequential change in vegetation and the animals and plants associated with it, either in response to an environmental change or induced by the intrinsic properties of the organisms themselves.
- Suppression:** all the work of extinguishing a fire or confining fire spread.
- Surface Fire:** a fire that burns over the forest floor, consuming litter, killing aboveground parts of herbaceous plants and shrubs, and typically scorching the bases and crowns of trees. See Backing Fire, Crown Fire, Fire, Flanking Fire, Ground Fire, Head Fire and Understory Fire.
- Surface Fuel:** fuels lying on or near the surface of the ground, consisting of leaf and needle litter, dead branch material, downed logs, bark, tree cones, and low stature living plants. See

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- Duff, Fuel, Large Woody Debris and Litter.
- Sustainability:** the condition of maintaining ecological integrity and basic human needs over human generations.
- Temporal:** a characteristic that refers to the time at which a given data set was acquired; relating to measured time.
- Threatened Species:** any species of plant or animal likely to become endangered—within the foreseeable future—throughout all or a significant portion of its range. See Endangered Species.
- Top Kill:** for individual plants, when some portion of the aboveground portion of an individual is killed, by any cause.
- Topography:** the physical features of a geographic area, such as those represented on a map, taken collectively—especially, the relief and contours of the land.
- Torching:** see Passive crown fire.
- Type Conversion:** changing one vegetative type to another. Generally thought of as a rapid conversion from one type to a completely different type but can also occur subtly over time. This is different than successional trajectory where vegetation follows expected changes in type over time. An example is converting an area that would naturally contain mixed conifer hardwood forest to a pure conifer forest by removing hardwoods and planting only conifers. Another example could be suppressing frequent fires allowing conifers to shade out hardwoods converting mixed conifer hardwood forests to conifer forests.
- Unplanned Ignition:** the initiation of a wildland fire by lightning, volcanoes, unauthorized and accidental human-caused fires (see wildfire).
- VSS class:** Classification of trees by size using DBH and Height as the primary criteria (see Silvicultural report for details (details in the Silviculture report).
- Weather:** the specific condition of the atmosphere at a particular place and time. It is measured in terms of such things as wind, temperature, humidity, atmospheric pressure, cloudiness, and precipitation. In most places, weather can change from hour-to-hour, day-to-day, and season-to-season. Climate is the average of weather over time and space. A simple way of remembering the difference is that climate is what you expect (e. g. Cold winters) and 'weather' is what you get (e.g. a blizzard).
- Wildfire:** unplanned ignition of a wildland fire (such as a fire caused by lightning, volcanoes, unauthorized and accidental human-caused fires) and escaped prescribed fires. (See unplanned ignition and escaped prescribed fire).
- Wildland Fire:** a general term describing any non-structure fire that occurs in the wildland.
- Wildland Urban Interface (WUI):** The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels. Wildland-urban interface (WUI) includes those areas of resident populations at imminent risk from wildfire, and human developments having special significance. These areas may include critical communication sites, municipal watersheds, high voltage transmission lines, church camps, scout camps, research facilities, and other structures

that, if destroyed by fire, would result in hardship to communities. These areas encompass not only the sites themselves, but also the continuous slopes and fuels that lead directly to the sites, regardless of the distance involved. (FSM 5140.5)

Woody Debris: the dead and downed material on the forest floor consisting of fallen tree trunks and branches.

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Appendix B: Models and Processes used in Fire Modeling

Fire models are tools to help depict relative change in fire behavior and effects across the landscape. Although there are limitations to fire modeling, the model outputs provide useful information for planning and assessing restoration treatments (Stratton 2004, Stratton 2006). Interpretation, professional judgment and local knowledge of fire behavior and effects were used to evaluate the outputs from the models. Data used for modeling fire across a landscape rarely uses the exact numbers as measured in the field for canopy characteristics. The intent of fire modeling is to find the combination of fuel models, fuel characteristics (canopy base height, canopy bulk density, canopy cover, canopy height), fuel moistures, and weather parameters that produce the most accurate modeled fire behavior. That usually means ‘gaming’ the fuel models, adjusting various characteristics until the modeled fire behavior most closely represents known fire behavior. In this manner, canopy cover in a fuel model is adjusted by the same age as shown in modeled silvicultural change/s. The degree of change is what is important for the modeling exercise, and that requires canopy cover numbers that are measured in a consistent manner so that the change is valid.

Models Used:

The models and data listed below were used as described for modeling potential fire behavior and effects.

Nexus

Version 2.1 – Nexus was used to model fire type (Finney 2006). Specifically, a spatial instance of Nexus (gNexus) that utilizes the batch function in Nexus to process spatial conditional fire behavior outputs. Scott and Burgan (2005) fuel models were used to model fire type relative to each management alternative.

Forest Vegetation Simulator (FVS)

The FVS is a model used for predicting forest stand dynamics throughout the United States and is the standard model used by various government agencies including the USDA Forest Service, USDOJ Bureau of Land Management, and USDOJ Bureau of Indian Affairs (Dixon 2008). The FVS is an individual tree, distance independent growth and yield model with linkable modules called extensions, which simulate various insect and pathogen impacts, fire effects, fuel loading, snag dynamics, and development of understory tree vegetation. FVS can simulate a wide variety of forest types, stand structures, and pure or mixed species stands (CRVAR 2010). Forest managers have used FVS extensively to summarize current stand conditions, predict future stand conditions under various management alternatives, and update inventory statistics.

Geographic variants of FVS have been developed for most of the forested lands in the United States. New “variants” of the FVS model are created by imbedding new tree growth, mortality, and volume equations for a particular geographic area into the FVS framework (CRVAR 2010). The Central Rockies (CR) variant covers all forested land in Forest Service Regions 2 and 3 and was used in the vegetation analysis for this project area. This variant was initially developed in 1990 and has been continually updated to correct known deficiencies and quirks, take advantage

of advances in FVS technology, incorporate additional data into model relationships, and improve default values and surrogate species assignments (CRVAR 2010).

For simulation purposes, each data set was grouped by current forest type, VSS code, site class and treatment type. Simulations were developed for each treatment based on desired conditions. A multitude of vegetation and fuels attributes were computed for each growth cycle. Attributes include tree density (trees per acre, basal area and SDI) by species or species groups and VSS size class, dwarf mistletoe infection, cubic feet of biomass removed, canopy base height and bulk density, live and dead surface fuel loading, live and dead standing wood, coarse woody debris and snags. These attributes were then averaged for all the data sets represented in the simulation. The averaged computed attributes from FVS were also used to calculate other attributes such as dominate VSS size class, canopy density and even-aged or uneven-aged structure. All of these attributes were then compiled into an “effects” database by Alternative and used to analyze and display the direct and indirect effects to the vegetation resource.

Fire/Fuels Extension (FVS-FFE)

The Fire and Fuels Extension (FFE) to the Forest Vegetation Simulator (FVS) links models of fire behavior, fire effects and fuels loading to tree growth metrics (Dixon 2003; Rebain 2016). For more details on the FVS-FFE modeling, see the Silviculture Specialist Report. The Fire and Fuels Extension (FFE) to FVS was used to simulate fuel dynamics over time. Those data were used to inform the process of assigning post-treatment fuel models. Additionally, FFE provided the data for evaluating modeled treatment

FlamMap

FlamMap is a fire behavior mapping and analysis program that computes potential fire behavior characteristics over an entire landscape for given weather and fuel moisture conditions. FlamMap uses GIS-based raster inputs for terrain and fuel characteristics (elevation, slope, aspect, fire behavior fuel models, and canopy characteristics), computes fire behavior outputs for a given landscape using standard fire behavior prediction models, and generates raster maps of potential fire behavior characteristics (spread rate, flame length, crown fire activity, etc.) over an entire landscape.

Uniform Conditions

FlamMap and gNexus employ the fire behavior model (Rothermel 1972). The Rothermel fire behavior model makes several assumptions which include:

- The fire is free-burning
- Fire behavior is predicted for the flaming front of a surface fire
- Fine fuels are the primary carrier of the initial fire front
- Fuels are continuous and uniform

FlamMap then utilizes Van Wagner's 1977 crown fire initiation model, Rothermel's 1991 crown fire spread model, and Nelson's 2000 dead fuel moisture model to model both crown fire.

Fire behavior outputs generated from modeling exercises only reflect static conditions and do not take into account changing weather conditions. Any change in these factors could drastically

affect fire behavior. Given the uncertainty of any modeling exercise, the results are best used to compare the relative effects of the alternatives, rather than as an indicator of absolute effects. Interpretation, professional judgment, and local knowledge of fire behavior were used to evaluate the outputs from the models and adjustments made as necessary to refine the predictions.

FlamMap assumptions and limitations

Since FlamMap uses the same underlying models (Rothermel's 1972, 1991, Van Wagner's 1977, and Nelson's 2000) for surface fire spread, crown fire spread, and dead fuel moisture, it will inherently have the same assumptions and limitations as each of those models. In addition, FlamMap 3.0 has a number of additional limitations:

- Modeling results assume that all mechanical treatments occurred in 2012, and prescribed fires occurred across all areas proposed for treatment in 2015 and again in 2019. In reality, the treatments would be spread out over the life of the project. This means that desired conditions across the entire landscape may not occur concurrently.
- All fire behavior calculations in FlamMap Basic assume that fuel moisture,
- wind speed, and wind direction are constant for the simulation period.
- The fire behavior calculations are performed independently for each cell on the gridded landscape.
- Flammap doesn't use a 24 hour clock, so diurnal weather changes, which could affect fire behavior, are not accounted for
- Canopy characteristic in the Landfire data were adjusted by the percent change indicated by the changes in the FVS data to represent post-treatment conditions.

Canopy cover for fire modeling:

Canopy cover (cc) is one of four canopy characteristics are necessary for evaluating and modeling fire behavior and/or effects. In the fire models, canopy cover affects outputs for:

- Active crown fire (horizontal continuity)
- Passive crown fire (as it affects surface fire intensity)
- Fireline intensity/flame length (more wind means higher intensity, longer flame lengths, affects crown fire initiation)
- Rate of spread (open canopies allow higher winds at the surface)

Fuel models, used for modeling fire, rarely use *measured* canopy characteristics. The intent is to find the combination of fuel models, fuel moistures, and weather parameters that allow models to most accurately predict fire behavior. That usually means 'gaming' the fuel models, adjusting various characteristics until the modeled fire behavior most closely represents known fire behavior. In this manner, canopy cover in a fuel model is adjusted by the same percentage as shown in modeled silvicultural change/s. The degree of change is what is important for the modeling exercise, and that requires canopy characteristic data that are obtained in a consistent manner so that the percent change is valid.

FireFamilyPlus (FF+)

Version 4.2– Used to determine percentile weather

FireFamilyPlus is a software system for summarizing and analyzing historical daily fire weather observations and fire occurrences and computing fire danger indices based on the National Fire Danger Rating System or the Canadian Fire Danger Rating System. Fire occurrence data can also be analyzed and cross referenced with weather data to help determine critical fire weather, fuel moistures, and fire danger for an area. FF+ was used to:

- Evaluate weather percentiles for determining the overall context of the Rodeo/Chediski Fire conditions.
- Identify fires of interest to this analysis (this was verified with local fire managers)
- Produce wind roses and wind data
- Produce precipitation data from the three Remote Automated Weather Stations most pertinent to the project area.

Post-treatment fuel model assignments

Fuel, fuel moisture, wind, and slope are assumed to be constant during the time for which predictions are to be applied. Because fires almost always burn under non-uniform conditions, the length of projection period and choice of fuel model must be carefully considered to obtain useful predictions. The more uniform the conditions are, the longer the projected time can be. The number of simulations for which fuel models needed to be assigned expanded from ~17 (in August of 2011) to 1,492 (February, 2012). During this time, the following process was developed to assign fuel models based on the following outputs from FVS and defined fuel model characteristics (Scott and Burgen 2005).

To more accurately assign post-treatment fuel models, the assumptions described in the previous section on Mortality and Consumption were applied as follows for each variable of interest for each simulation:

IF:

a = 2012 tons/acre = 120

b = 2015 tons/acre = 70

c = 2012 – 2015 = -50 tons/acre (amount consumed in the burn)

d = in 2012 70 of 'a' that was affected by the burn = 84 tons/acre

e = in 2012 30 of 'a' that was not affected by the burn = 36 tons/acre

SO,

c = 59 of d that was consumed (for first simulation with 70:30)

SO, for each simulation for which it was 80:20 (the ratio deemed more realistic for the second burn):

$(a^* . 7) = 84 \text{ tons/acre}$

59 of 96 tons/acre = 57 tons/acre

$a^* . 3 = 36 \text{ tons/acre}$

$2012 - (((2012 - 2015)/(2012 * . 7)) * (2012 * . 7)) + (2012 * . 3) = 2015 \text{ value}$

Inputs:

FVS-FFE output data from the following categories was used/considered. Those in italics used the data adjusted for mortality, those in standard font did not.

- B = pj tpa<5" (Trees/acre less than 5" dbh of Pinyon/Juniper)
- C = pj tpa >5" (Trees/acre greater than 5" dbh of Pinyon/Juniper)
- D = potr tpa <5" (Trees/acre less than 5" dbh of aspen)
- E = potr tpa >5" (Trees/acre greater than 5" dbh of aspen)
- F = mc tpa<5" (Trees/acre less than 5" dbh of mixed conifer)
- H = cc (canopy cover ())
- I = cbh (feet)
- J = cbd (kg/m³ * 100)
- K = shb (tons/acre)
- L = quga tpa<5" (Trees/acre less than 5" dbh of Gambel Oak)
- M = quga tpa>5" (Trees/acre greater than 5" dbh of Gambel Oak)
- N = herb (herbaceous surface vegetation in tons/acre)
- = Litt (adj) (tons/acre)
- P = Duff (adj) (tons/acre)
- Q = Fines (Litt+1hr) (tons/acre)
- R = 1hr (adj) (1 hour fuels (<1/4" diameter) in tons/acre)
- S = 10hr (adj) (10 hour fuels (>1/4 and <1" diameter) in tons/acre)
- T = 100hr (adj) (100 hour fuels (<1" and >3" diameter) in tons/acre)
- U = 1000hr (adj) (1000 hour fuels (>3" diameter) in tons/acre)
- AA = Canopy Density (A, B, or C)

Fuel Model Characteristics considered (Scott and Burgen 2005):

Fine fuel load (T/a)

- Potential FL (very dry)
- Potential ROS (very dry)
- Coarse fuel load (T/a)
- Species (deciduous vs. Conifer; aspen dominant)

Process:

Step 1: Apply formula to account for the difference in area between modeled area burned and the adjusted area (to account for a more complete burn) area burned for years 2015, 2020, and 2040. There were no treatments after 2020 so, in order to account for the differences in surface fuels from the earlier burns, the 2040 Adjusted fuels were adjusted by the change between 2020 and 2020 Adjusted.

Step 2: Apply the formulas below to the appropriate data into the ‘first cut’ sheet to assign simulations to either: Timber, Shrub, or Grass based on the following criteria. This is an initial cut only, and as further classifications are completed in this process, simulations may be moved from their original assignment to other types.

Grass (GR) and grass/shrub (GS) fuel models:

CBH > 17.99 ft. And CC < 30

Rationale: A combination of CC and CBH can determine if crown fire is possible under most situations. CBH for initiation, CC for active vs. passive. Surface fuels alone could produce sufficient surface fire intensity to initiate crown fire in some high canopy base heights but, for this first cut, if these criteria were met the simulation was classified as ‘GR’.

Shrub fuel models (SH):

CBH < 17.99 ft, CC < 30

Rationale: CC isn’t sufficient to be able to carry a fire through the canopy, so it isn’t a timber model (<30% CC) but CBH may be low enough to initiate cf in whatever woody veg there is (CBH < 18.00). This was a more challenging category, but it seemed to pick out PJ, Sage, and other potentially shrubby fuel types. This was just the first cut so simulations that fell into this category could be moved if further classification indicated it was better elsewhere (such as GS or TU).

Timber Litter (TL) and timber understory (TU) models:

CC > 29.99 (See assumptions below)

Rationale: Observations in the field are supported by the stand data and modeling to show that CC affects surface fuel loading for all types (herbaceous, CWD, duff, litter), as well as the potential for crown fire. 30% is a common number used to define savanna vs. Forest Service.

Assumptions:

- QUGA and POTR are deciduous and, therefore they, and their leaf litter, have different characteristics than ppine or mixed conifer
- PJ <5" MC <5" have more flammable morphology (lower and denser canopies) and have greater CBD than QUGA, so more QUGA <5" were deemed necessary to justify classification as having a shrub fuel component
- In 10 years, all stands had been rx burned twice and, all proposed mechanical treatment were completed.
- In stands where aspen dominates, the ecosystem is different. More cool season species, moister understory conditions much of the time as compared with conifers and oak. The dead/down component also appeared to be much higher in most aspen stands (in the FVS data) than in other species, so aspen was given a fuel model (186) of its own

Step 3: Assign models as per the formulas below. Note that simulations classified initially as 'TL' will be split into TL and TU (see below) before specific fuel models are assigned.

GR (grass)

101:

Rationale: Only a little shrub/woody component. Litter was the differentiating factor. Spread rate moderate to low compared with other grass models, depending largely on the continuity of the fuel. Most of this would be in dry, open areas. Much of the herbaceous fuel would be discontinuous, so burns wouldn't be 100. PJ and MC variables present in 102 classification made no difference for this classification, and were removed.

$(\text{Litter} + 1 \text{ hr}) < 0.72 \text{ AND shrub} < 0.25$

OR

$(\text{litter} + 1 \text{ hr}) < 0.72 \text{ AND (tpa QUGA} < 5'') < 300$

102:

Greater fine fuel loading than 101, and fuels more contiguous. ROS moderate, may be high in wet years or small areas. This allows a small component of woody fuels (quga, pj, and/or mc).

$((\text{Litter} + 1 \text{ hr}) > 0.72 < 2) \text{ AND shrub} < 0.25 \text{ AND (tpa QUGA} < 5'') > 400 \text{ AND (TPA} < 5'') \text{ mixed conifer and PJ)} < 25$

GS (grass/shrub)

SHB must be a component (see above), as well as greater fine fuel/litter loading than in the GR models.

121:

$(\text{Shrub} > 0.35 < 0.79) \text{ AND } ((\text{litter} + 1 \text{ hr}) > 0.9 < 1.7) \text{ AND } ((\text{tpa quga} < 5'') > 160 < 300)$

OR

$(\text{litter} + 1 \text{ hr}) > 0.9 \text{ AND (TPA} < 5'') \text{ mixed conifer and PJ)} > 25 < 40$

OR

(litter + 1 hr) >0.9< 1.7 AND (tpa quga <5'')>300<500) AND (TPA mixed conifer and PJ <5'') <20

Rationale: A minimum of .25 T/acre of shrub-like fuels, and a potentially greater (though still low) component of woody fuels in the form of 1 hr or small shrub-like trees (PJ, MC, quga). Less contiguous fuel than 122, but with very small areas of higher severity where there is a woody component, though not continuous.

122:

(litter + 1 hr) > 1.5 AND shrub>0.75

OR

(litter + 1 hr) >1.2 AND (tpa quga >5'') > 500 AND (TPA<5'' mixed conifer and PJ) >40

Rationale: Similar to 121, but greater fuel loadings. Overall fuels are more contiguous than 121. Woody fuels may be more frequent, but are still not contiguous. FL moderate and ROS high because mostly contiguous fuels.

SH (shrub)

Shrub/PJ are the main component defining 141, 142, and 145.

141:

CC<26 AND CBH < 17 AND (tpa all PJ) >10, (tpa PJ >5'') < 40; herbaceous > 0.17

OR

CC < 26 AND shrub > 0.75 AND (litter + 1 hr) >0.75<2. 1

OR

CC < 26 AND shrub > 0. 5 AND (litter + 1 hr) >0.75<2.1 AND (TPA<5'' mixed conifer and PJ) >40

Rationale: This is broad enough to include those areas with a number of small trees, but low fine fuel loading. Includes a fair amount of PJ. Fire behavior is expected to be low with spread being minimal without a strong wind. Flame length and ROS low, mostly because of discontinuous fuel.

142:

Herbaceous <0.15

OR

Herbaceous <0.165 AND (tpa quga <5'') >300<400)

Rationale: Low potential for spread without wind, almost no herbaceous fuel present, so wind is required for much spread. With sufficient wind, intensity is potentially high in places, but spotty and discontinuous. Includes a variety of fuel types, but picked up the higher fuel loadings of PJ.

145:

(TPA PJ<5") > 200 AND CBH < 10 AND CC > 25

Rationale: With much wind, this can produce high intensity fire and, as classified, included simulations with a moderately high component of QUGA <5" as well so, combined with the canopy characteristics, this is likely to produce a crown fire with high rates of spread and high flame lengths.

TU/TL (Timber Understory/Timber Litter)

NOTE: in reviewing the TL models (after the original TL/TU split), the highest values for PJ<5", MC<5" were reviewed and, if L5 was greater than 500, it was moved to TU. Any remaining TL models with CC<30 were moved to TU, and the lowest CC values were reviewed to see if any of them should be moved to TU or GR/GS. The assumption was that a more open canopy would produce sufficient surface fuels to contribute to fire bx, and insufficient needle litter to really qualify as TL.

TU (Timber Understory)

CC < 60 AND Canopy closure = A (open)

OR

CC < 60 AND Canopy Closure = A or B AND (herbaceous + shrub) > 0.4

OR

CC < 60 AND (herbaceous + shrub) > .75 AND (tpa quga <5") >900 AND (TPA mixed conifer < 5" and PJ < 5") >60

Rationale: This should be common across much of the 4FRI landscape with surface fire being the norm unless conditions are extreme. Herb or shrub component required. The shrub component may be represented by small MC or small PJ. Canopy should not be entirely closed in order to allow a surface fuel component of vegetation instead of just dead/down fuels, litter, and duff.

TL (Timber Litter): Not as above.

161:

(tpa pj <5" + mixed conifer <5") < 152 AND (quga <5") <1500

Rationale: This picked up a lot of simulations, as it should. Some passive crown fire may occur in this fuel model, but spread rate and flame length are low. Surface vegetation, including herbaceous, shrubs, and small conifers is present. The canopy is open enough to assume that there will be at least a moderate amount of herbaceous fuels.

162:

$(tpa\ pj < 5'' + mixed\ conifer < 5'') > 150 < 500$

OR

$(tpa\ quga < 5'') > 1500 < 3000$ AND $(tpa\ pj < 5'' + mixed\ conifer < 5'') > 150 < 500$

Rationale: This fuel model is intended to pick up the moderate amount of fuel loading and passive crown fire potential in areas not well represented by 161 or 165. It is generally a humid climate model, so fuel moistures were modeled lower for this than for the other TU models. Spread rate is moderate because of more contiguous fuel than 161, crown fire is more likely than in 161, but not as likely as 165. Flame lengths can be moderate, depending on burning conditions.

165:

$(tpa\ pj < 5'' + mixed\ conifer < 5'') > 500$ AND $(tpa\ quga < 5'') > 3000$

Rationale: Higher fuel loading, with potential for undesirable fire effects. Lots of ladder fuels, good potential for crown fire initiation. Rate of spread and flame length moderate.

TL (Timber Litter)

Timber litter is the primary carrier of the fire. Canopies are mostly closed, and/or surface fuel loading other than dead/down woody debris, litter, and duff is minimal.

181:

$Duff < 1.5$ AND $(litter + 1\ hr) > 0.75 < 2.75$ AND $(potr < 5'' + quga < 5'' + potr > 5'' + quga > 5'')$
 < 50 AND $(tpa\ pj < 5'' + tpa\ mc < 5'') < 50$

Rationale: Light surface fuel loading because of low surface productivity, or recent burns. Canopy cover may be lower in this fuel model. Flame length and rate of spread should be low as litter is the primary carrier of the fire. Surface fuels may be discontinuous in places.

182:

$(tpa\ quga < 5'') > 450$ AND $(tpa\ quga > 5'') > 75$ AND $(100\ hr + 1000\ hr) < 12$

OR

$(tpa\ all\ potr + tpa\ all\ quga) > 50$ AND $duff < 6$ AND $(litter + 1\ hr) > 1 < 7$ AND $(tpa\ pj < 5'' + tpa\ mc < 5'') < 50$ AND $(100\ hr + 1000\ hr) < 12$

Rationale: Surface fuel loading is low to moderate, with contiguous fuels prevalent. One aspect of the fuel model picks up areas with higher deciduous components (excluding those dominated by aspen). In general, this fuel model picks up low to moderate surface fuel models in a wide variety of pine and pine oak forests.

183:

$Duff > 1.5 < 6.7$ AND $(1\ hr + 10\ hr) < 7$ AND $(tpa\ potr < 5'' + tpa\ mc < 5'') < 50.85$ AND $(tpa\ PJ < 5'' + tpa\ mixed\ conifer < 5'') < 50$ AND $((100\ hr + 1000\ hr) AND (litter + 1\ hr) < 7.1$

Rationale: Fuel model 183 has low to moderate fuel loading. Canopies are mostly open, and canopy base heights moderately high. These should be areas that have been thinned and/or have had fire in the last 10 years so that fire behavior produces mostly low severity effects that are beneficial to the ecosystems.

184:

$(100 \text{ hr} + 1000 \text{ hr}) > 12 < 16$ AND $(\text{tpa PJ} < 5'' + \text{tpa mixed conifer} < 5'') < 50$ AND $1 \text{ hr} > 0.1 < 1.4$ AND $\text{duff} < 15$ AND $(\text{litter} + \text{duff}) < 11$

Rationale: High surface fuel loading (23 – 30 tons/acre) with a CWD ($> 3''$) component averaging 9 tons/acre. Canopies are more open than the ‘higher’ timber litter models though so, although surface effects have potential to be negative, heat can escape upwards in most simulated areas with less scorch/damage to the canopy. Spread rate and flame lengths would be low to moderate, with the range depending on the openness of the stand (mid-flame wind).

185:

$\text{CC} > 60$ AND $(100 \text{ hr} + 1000 \text{ hr}) < 13$ $(100 \text{ hr} + 10 \text{ hr}) > 6$ AND $(\text{litter} + 1 \text{ hr}) > 7$ AND $(\text{tpa PJ} < 5'' + \text{tpa mixed conifer} < 5'') < 50$

OR

$(100 \text{ hr} + 1000 \text{ hr}) > 7 < 12$ AND $(\text{litter} + 1 \text{ hr}) > 7$ AND $\text{duff} > 4 < 10$

Rationale: Fuel model 185 represents high fuel loading, with a mix of fuel sizes. Surface fuel loading exceeds 21 tons/acre, with over 7 tons from litter and 1 hour fuels. Closed canopies may contribute to excessive scorch and negative surface and soil effects even when no crown fire occurs.

186:

$(\text{tpa potr} < 5'') > 600$ AND $(\text{tpa potr} > 5'') > 50$

Rationale: This fuel model, in this analysis, represents stands dominated by aspen. Fire would be of mixed severity most of the time, lower flammability than the surrounding grasslands and conifer forests most of the time. For many of the simulations of aspen stands (7 out of 20), large CWD exceeds 14 tons/acre, and for 9 out of 20, fine dead surface fuels (litter and 1 hr) exceed 8 tons/acre. However, litter in aspen burns differently than in conifers, and is less flammable than oak so flame lengths would be low and ROS moderate except under extreme conditions.

187:

$(100 \text{ hr} + 1000 \text{ hr}) > 15.99$ AND $(\text{tpa pj} < 5'' + \text{tpa mixed conifer} < 5'') < 50$

Rationale: Fuel model 187 has high surface fuel loading, with a high component of large CWD sufficient to cause high severity surface effects in the event of a fire burning in extreme conditions. Crown fire is possible, but not necessary to cause high severity effects to soils and vegetation, since they could come from high quantities of surface fuels burning hot. Surface fuel loading ranges from 26 tons/acre to 57 tons/acre.

188:

Duff > 15 AND (100 hr + 1000 hr) < 15.99

OR

CC > 45 < 60 AND (litter + 1 hr) > 7.5 AND (tpa pj < 5" + tpa mixed conifer < 5") < 50 AND 1000 hr < 8 AND (tpa quga < 5") < 300

Rationale: This fuel model picks up mostly closed canopy pine where there has been no fire for decades. Surface fuel loads are high, but dominated by litter/duff/1 hr fuels with only a low to moderate load of dead/down CWD. Unless/until crown fire is initiated, flame lengths are low and ROS is moderate to low. These areas have high potential for high severity effects in ponderosa pine because of contiguous canopies and surface fuel loads sufficient to scorch canopies where there is no crown fire. Surface fuel loading ranges from 20 to over 32 tons/acre and in most simulations, duff loading exceeds 15 tons/acre.

Step 4: Review simulations to ensure they make sense. If there are duplicates assigned, or no fuel model assigned (these should constitute less than 10 of all simulations), review variables and assign fuel model. Simulations may be moved from one category to another if perusal of the variables and the formula do not place it in an appropriate category.

Landfire 2014

LF_1.4.0 – LANDFIRE products are designed to be used at a landscape-scale in support of strategic vegetation, fire, and fuels management planning to evaluate management alternatives across boundaries. Landfire is the only existing source of the type of data needed for this type of analysis that is consistent across ownership boundaries. It is a combination of Landsat8 images and plot data, with well over 1,000,000 plots. Landfire data was combined with Lidar data to create the 'base' data used for fire modeling.

Lidar data

This set of data was collected in 2013, 2014. It was converted into data sets with a resolution of 30m x 30m that was compatible for fire modeling, and used to inform the assignment of fuel model, canopy height, canopy bulk density, and canopy cover.

Fire Hazard Index

Seven datasets were used to identify areas of high probability for severe fire effects and/or extreme behavior. These datasets are crown fire potential, fireline intensity, heat per unit area, fuel model, slope, soils with high erosion hazard, and WUI areas. Pixels were rated according to the matrix below. The total points possible are 12.

As a general rule, the amount and size of plants top-killed by fire increases with an increase in either the rate of heat energy released (fire intensity) or total amount of heat energy released (heat/unit/area). Estimates of the rate and amount of this heat release are

thus important descriptors of fire behavior (Wade 2013). Thus, two measures of energy were used, and are described below.

Heat per unit area (hua): ‘hua’ is the total amount of heat released in a given area of the flaming fire front, usually expressed as Btu per square foot, though in this process kJ/m^2 was used. All of the heat given off in the *flaming* front is included in this value, regardless of the length of time that the flaming front persists. This allows a better estimate of *burn severity* (fire effects to soil) than the more commonly used fireline intensity (see description below). Heat released after the flaming front has passed (smoldering combustion) is not included in heat per unit area. Categories used are based on an index developed for the Flagstaff Watershed Protection Project by Mary Lata (Fire Ecologist, 4FRI); Tom Runyon (Hydrologist/BAER, Coconino National Forest), and Wes Hall (Prescribed Fire Specialist, Coconino National Forest). Heat/unit/area is given in kJ/m^2 as follows: high soil burn severity was assumed at or above $60,500 \text{ kJ/m}^2$; moderate heat/unit/area was assumed between $8,700 - 60,499 \text{ kJ/m}^2$.

Fireline intensity (fli). This is the amount of heat given off by a fire along each foot of the leading edge of the fire each second, usually expressed as Btu per linear foot of fireline per second. This measure is useful for evaluating control objectives because there is almost a 1:1 correlation between fli and Flame Length (FL) (Stratton 2009). This also can give an indication of scorch, or how imminent crown fire might be since flame lengths of half the canopy base height can ignite the canopy. Thresholds set for the expected fire severity (effects to vegetation) at different fireline intensities are based on fireline intensity levels documented in a case study of a wildfire on the Coconino National Forest (Campbell *et al.* 1977), these levels are:

Moderate severity at $2,500 - 10,000 \text{ BTU/sec/ft}$. This correlates with Flame Lengths of at least $\sim 35'$.

High severity $\geq 10,000 \text{ BTU/sec/ft}$. This correlated with Flame Lengths of over $90'$.

Crown Fire. This is when a fire burns the canopy of trees.

Active Crown Fire: Causes 100% mortality in most conifers in the Rim Country project area. The two exceptions are Alligator Juniper (*Juniper deppeana*) and Chihuahuah Pine (*Pinus leiophylla*), both of which may sprout if top-killed or damaged by fire. Additionally, active crown fire is difficult to control since direct attack is not possible, and spotting is common.

Passive Crown Fire: Passive crown fire at some levels is a normal part of the fire ecology in ponderosa pine and related systems. Nonetheless, when it occurs in proximity to active crown fire, or if there are large areas that have potential for passive crown fire, small shifts in wind may cause it to become active, or result in spotting. As such, it was given a value of 1 in the rating process below.

Surface Fire: This was not given any points because, in general, it is not a threat for control and, without further information on hua or fli, wouldn't be expected to produce undesirable fire effects.

Soil – High Erosion Hazard. Soil and water are fundamental to every terrestrial ecosystem on earth. When soil is damaged to the point that it is vulnerable to erosion by water or wind, the potential effects to an ecosystem may be considered permanent since, with changing climates, it is unknown how long the soil-forming process would take, and what soil/s would be formed. Soil is one of the ecological characteristics that defines the potential of a site, and there is a symbiotic relationship between soil and the flora and fauna that inhabit an ecosystem. So permanent or long term changes to the soil are likely to change the potential of a site.

Slope. Slope is a factor in the permanence of second order fire effects because of the potential for surface layers to be lost to erosion. Surface soil layers are critical to site potential, and can take

100s of years to reform, if they can reform. A 30% slope was used as a generalized threshold at which many soils become vulnerable to erosion.

| | | | |
|------------------------------------|--------------------------|---|--|
| Crown fire | Active | 3 | Includes conditional crown fire |
| | Passive | 1 | Single tree or group torching |
| Heat per unit area | High | 2 | >60,500 kJ/m ² |
| | Moderate | 1 | 8,700 – 60,499 kJ/m ² |
| Surface fire intensity(fli) | > 10,000 (high) | 3 | BTU/ft/sec Indicates fl > ~90 ft. (Stratton 2009) |
| | 2,500 – 9,999 (moderate) | 2 | BTU/ft/sec Indicates fl > ~30 ft. |
| Slope >30% | | 1 | Increases likelihood of negative impacts to onsite resources (seed bank, soil, etc) as well as potential downslope effects (debris flows, etc) |
| Soil - High Erosion Hazard | | 1 | TEU soil types indicating a severe erosion hazard |

Scoring:

Variable: Fire Line Intensity:

| Fire Line Intensity | BTU/ft/sec | | INDEX |
|----------------------------|-------------------|--|--------------|
| handline/dozerline | 0-1700 | | 0 |
| torching | 1700-3500 | | 1 |
| crowning | >3500 | | 2 |

Variable: Heat per Unit Area:

| HUA | kJ/m2 | BTU/ft2 | INDEX |
|------------------------|--------------|----------------|--------------|
| low soil severity | < 8700 | < 765.6 | 0 |
| moderate soil severity | 8700 - 60500 | 765.6 - 5324 | 1 |
| high soil severity | > 60500 | > 5342 | 2 |

Variable: Erosion Potential:

| EROSION | | | INDEX |
|--|--|--|--------------|
| < 30% Slope & low erosion potential | | | 0 |
| > 30% Slope or High erosion potential | | | 1 |
| > 30% slope and high erosion potential | | | 2 |

Variable: Crown Fire Activity:

| Crown Fire Activity | | | INDEX |
|----------------------|--|--|-------|
| surface/non burnable | | | 0 |
| passive | | | 1 |
| conditional | | | 2 |
| active | | | 3 |

The overall fire hazard index was scored by summing the values for each variable at each pixel location using the following scoring:

| Fire Hazard Index |
|---|
| sum of FLI + HUA + CFA = Hazard Sum |
| Hazard Sum Classes = Fire Hazard Index: |
| (0 - 1) = 1 = very low FHI |
| (2 - 3) = 2 = low FHI |
| (4 - 5) = 3 = moderate FHI |
| (6 - 7) = 4 = high FHI |
| 7+ = 5 = extreme FHI |

Modeling Assumptions

Fire Behavior, surface fuels, and canopy fuels modeling

Percentile weather fire modeling

Modeling percentiles of fire weather and fuel characteristics is used to model various fire indices, such as Energy Release Component, Burning Index, or Spread Component, modeling straight weather percentiles is not a good tool for planning. Sometimes fire behavior is modeled, but it is more useful for some research questions, or in instances that do not involve implementing site-specific management. Percentile weather and fuel conditions are the conditions for which a specific number of days per year are above or below a given percentile. For example, if one were to model the 97th percentile for a given area, the relative humidity (rh) and fuel moistures use represent levels for which on 97% of days per year it is higher. So, if the 97th percentile rh is 10%, it means that for 97% of the days per year, minimum humidity is at or greater than 10%. If the 97th percentile temperature is 80°F, it means that, for 97% of days per year, temperatures are at or lower than 80°F, and so on. The chances of the 97th percentile relative humidity; temperature; wind speed; 1, 10, 100, 1000 hr, foliar, woody, and herbaceous fuel moistures, and wind direction all occurring on the same day are very small. Therefore, results of such modeling usually over-predict fire behavior. Even for extreme fire behavior, such as occurred in the Wallow, Schultz, and Rodeo/Chediski fires, the percentiles for weather and fuel parameters were not the same on any given day. Therefore, for this EIS, fire behavior was characterized based on the conditions under which the Schultz Fire burned on June 20th, 2010. McHugh (2006) states the process of modeling includes the following:

“Define the modeling objective or question

- Model selection based on modeling objective or question*

- *Spatial and temporal data development required by selected model*
- *Gather supporting spatial and temporal data*
- *Data critique and analysis of developed data*
- ***Calibration of the model to a past event(s)***
- *Simulations, evaluation and critique of results, and documentation*
- *Gaming-out, and what-if scenarios of fuel treatment location and prescription*
- *Evaluation, write-ups, and presentation of results*

Calibration of modeling scenarios to past events is critical. Calibration provides a mechanism for testing interactions of the data and model, allows one to evaluate model and data performance in predicting or matching to past documented fire events, provides insight into the respective fire models and how the interactions of data and user-defined model settings can affect modeled outputs. Additionally, and most importantly, it provides a means to evaluate the relevancy and accuracy of the data and instill confidence in future modeling projections.”

There are indices, such as Energy Release Component (ERC), or Burning Index (BI), which are usually referenced by percentiles, and there are specific weather variables for each of these percentiles. Using the 97th percentile ERC or BI, and the parameters associated with them is not the same as modeling the 97th weather percentiles. Fuel moistures are the primary inputs for calculating ERC, and wind and slope are not included, though they are critical components in evaluating and/or modeling fire behavior. We used FireFamilyPlus to analyze 20 years of data (1998 – 2016) from the Heber, Pleasant Valley, and Lakeside RAWS. In order to include other RAWS in the project area and/or in the vicinity of the Rodeo/Chediski fire, we included the Payson RAWS and the Promontory RAWS but, there were only 7 years of contiguous data from the Payson RAWS (2009 – 2016) and 12 years of contiguous data from the Promontory RAWS (2004 – 2016). We determined 97th percentile weather parameters based on all contiguous data up to 20 years (1998) in each of five RAWS in the vicinity of the Rodeo/Chediski Fire. Three critical weather factors that are recorded by RAWS, are used in modeling fire, and are significant variables in fire behavior on the ground were evaluated to determine if all three occurred at the 97th percentile or greater on the same day. These variables were: Maximum Temperatures (MxT), Minimum Relative Humidity (MinRH), and Wind Speed (WS). Not a single day of all the years of data indicated all three indices at or above the 97th percentile on the same day.

Table 25. 97th percentiles for critical weather factors at five RAWS stations.

| | | Days at or above 97th percentile | | | | | | 97th percentile WS + 97th of MxT OR MinRH | |
|------------|--------------|----------------------------------|--------|------|--------|-------|--------|---|--------|
| | | WS | | MxT | | MinRH | | | |
| | Days of data | days | % days | days | % days | days | % days | days | % days |
| Heber | 6,653 | 102 | 2% | 151 | 2% | 488 | 7% | 6 | 0.1% |
| Lakeside | 6,832 | 107 | 2% | 198 | 3% | 314 | 5% | 4 | 0.1% |
| PV | 6,804 | 212 | 3% | 270 | 4% | 337 | 5% | 11 | 0.2% |
| Payson | 2,882 | 68 | 2% | 152 | 5% | 143 | 5% | 4 | 0.1% |
| Promontory | 4,601 | 21 | 0% | 147 | 3% | 221 | 5% | 1 | 0.0% |
| All | 27,772 | 510 | 2% | 918 | 3% | 1,503 | 5% | 26 | 0.1% |

Wind is the single most important fire weather factor for wildfire spread in and near the Rim

Country project area. There are two aspects of wind that are considered in modeling fire: steady wind speed and wind gusts. Wind gusts are tricky because the strength and unpredictability of gusts is included by adjusting the steady wind speed upwards. Additionally, they are not always recorded by weather stations. Wind speeds at or above the 97th percentile occurred on 510 (2%) of the 27,772 days included in this analysis. 97th percentile wind speed ranged from 13 at Promontory to 17 at Lakeside. 97th percentile winds co-occurred with one of the other two other variables on less than one percent of the time. Using percentile weather conditions to model fire gives it equal value with other variables (such as MinRH, MxT, and fuel moistures) which, though important, are not as important as wind, thus, giving less accurate information on where and how fires are likely to burn on the landscape. Ultimately, windspeeds of 20mph were used in the fire modeling to best represent conditions experienced on the Rodeo-Chedeski fire.

Appendix C: Additional Concepts Applied to Analysis

A basic understanding of some concepts is important for interpreting the details of this analysis; these are summarized below.

Wildfire Risk

Wildfire risk is the spatial interaction of wildfire hazard with highly valued resources and assets, and the subsequent effects of this interaction (Finney et.al. 2005, Scott 2006; Thompson and Calkin 2011; Miller and Ager 2012, Scott et al 2013). Wildfire hazard is a physical situation with potential for wildfire to cause beneficial or negative impacts to values and resources (Scott et al 2013). Wildfire hazard consists of two components: likelihood and intensity.

Wildfire likelihood (i.e. burn probability), is influenced by a complex integration of topography, fuels, weather, suppression operations and ignition occurrence. Wildfire likelihood is very useful in fuel treatment prioritization as it identifies lands more likely to burn relative to others within a given area. For the current analysis, wildfire likelihood is not modeled because it is assumed that fuel treatments occurred simultaneously across the landscape.

Within this report intensity is characterized by Crown Fire Potential and an integrated Fire Effects Index (see below). These indices represent the maximum expected intensity of wildfire under a single specified extreme weather scenario.

Wildfire Risk assessments can be broken down into two primary assessments: exposure assessments and effects assessments. An exposure assessment is the spatial interaction of a resource or asset with the wildfire hazard. Exposure can be quantified by the number of acres (or another other relevant measure) that is expected to come in contact with wildfire of a given intensity. In this report, the exposure of highly valued resources are quantified and discussed in the specialist report for that resource. For example, the exposure of Mexican Spotted Owls is quantified in the wildlife specialist report. The resources and assets that will be analyzed in this report are:

Fire management, WUI, old growth trees, ERUs, and general watershed response.

An effects assessment takes this one step further and assessed the potential for benefits (gains) or costs (losses) to the resource or asset. In this DEIS, the effects assessments are qualitative and are discussed in the specialist report for that resource. The resources and assets for which effects will be qualified in this specialist report are:

Fire management, WUI, old growth trees, ERUs, and general watershed response.

Ecological Restoration Units (ERUs), cover types, and ecosystem components analyzed

In the Southwest, the US Forest Service has developed a framework of ecosystem types, or “Ecological Response Units” (ERUs), to facilitate landscape analysis and strategic planning. The framework represents all major ecosystem types in the region, and a coarse stratification of

biophysical themes. ERUs are map unit constructs; technical groupings of finer vegetation classes of the National Vegetation Classification. The suite of vegetation classes that make up any given ERU share similar disturbance dynamics, plant species dominants, and theoretical succession sequence (potential vegetation) (Wahlberg *et al.* 2017 (in draft)). For the most part, ERUs were used as the major classification for cover types (Figure 3). However, additional ecosystem components were added for components of ERUs for which data indicated a distinct type (aspen, grasslands, or riparian), or which are a significant enough component of multiple ERUs to warrant specific information. Gambel oak and Interior Chaparral, large and/or old trees, surface fuel loading, and understory vegetation are also evaluated because of their significant contribution to the landscape.

Fire Regime

A simple definition for ‘fire regime’ describes the role fire plays in an ecosystem. Fire interacts with other disturbances, such as insects, drought, wind and other weather related events to create spatial and temporal patterns that maintain an ecosystem within a certain range of conditions. Table 5 describes commonly referenced fire regimes that are used in this analysis (Barrett *et al.* 2010). While severity is not a reference to mortality, there is often a correlation (see discussion, next section). Over 92% of the treatment area was historically a Fire Regime I or II, with some aspen and PJ that is more likely to be Fire Regime III, IV or V.

Fire Return Interval (FRI) vs. Maintenance FRI

FRI is a characteristic of a fire regime that can be quantified based on spatial and temporal data. It is the average length of time between fires for a given area over a period of time. Frequent fire regimes are more common in areas, such as ponderosa pine, where dead biomass, (such as pine needle litter) is produced faster than it can decompose and/or where plant populations depend on frequent fire to regulate distribution and density (such as seedlings and woody species). Departure from the fire return intervals to which ecosystems are adapted produce somewhat predictable results in both fire behavior and fire effects. As such, it is a characteristic of a fire regime that can be useful on a landscape scale for evaluating the health of an ecosystem.

There is evidence that shows that a FRI that is longer than what occurred historically, or naturally, can maintain a relatively open, crown-fire resistant forest structure (Fulé and Laughlin 2007; Fulé 2012-2013), although other components of the area, such as species composition, would be affected. This ‘maintenance’ FRI does not represent a fully restored ecosystem. As referenced here, it represents a minimal level of fire that is needed to keep woody growth and fuel loading below a level at which they are likely to produce undesirable fire effects and behavior, including controlling woody species encroachment into grasslands. In the project area, this is a larger and more immediate problem than unnatural understory vegetative components because of the potential results of uncharacteristically severe fire effects in these areas. It is not intended to represent an FRI that would maintain historic habitat/plant communities. Its true range would vary with precipitation, mast years, and the coincidence of growing conditions with cone/seed production. Some level of maintenance with surface fire is critical to retaining open forest conditions and relatively low crown fire hazard into the future (Roccaforte and Fulé 2008).

Reintroducing fire

When fire is reintroduced into frequent fire-adapted ecosystems (such as ponderosa pine and dry

mixed conifer), from which it has been withheld for decades, the objectives of the first entry burn, and usually the second as well, will be different from maintenance burning (which is not the same as the Maintenance Fire Return Interval described above). The primary objective of the first entry burn is to begin to restructure the fuel profile. Even if the area was thinned before the burn, surface fuel loading, canopy base heights, and ladder fuels may still be highly departed from what would be healthy and sustainable. The **first entry** burn will kill or top kill most ladder fuels (shrubs and/or small trees), and lethally scorch a lot of needles in the lower canopy. Within a year or two, most scorched needles, along with some twigs and branches, will fall and produce a litter layer that is heavier, and often more contiguous, than would be natural (though still less than before the first entry burn). Over the year or two following the first burn, some surface vegetation may begin to grow, but some will still be suppressed due to the litter cover.

Additionally, within a few years, there may be a slightly higher load of woody debris from the killed and top-killed ladder fuels. If the initial entry burn included some mixed severity, there may also be a slightly higher than historical dead/down fuel layer.

The **second entry** burn will more completely reset the fuel structure, consuming most of the fallen scorched needles and decreasing excessive woody debris that will be produced as branches and trees killed by the fire fall to become part of the surface fuel loading.

Because of the focus on fuel structure for the first two burns, the timing/seasonality of those burns is less important than for maintenance burns. Once an area is in a condition for maintenance burning, seasonality is more important because of the timing of the rainfall, temperatures, photoperiods, and interactions with other flora/fauna with which native vegetation evolved

Fire Intensity versus Fire Severity

Fire intensity and fire severity are often confused, though both are commonly used in descriptions of fire regimes, behavior, and effects. Fire severity is about the *effects* of a fire while fire intensity is about the *behavior* of a fire. Fire intensity was used as one input in the Fire Hazard Index. Fire intensity is a *quantitative* measure of the fire itself, usually defining energy release rates. Fire severity is a *qualitative* evaluation of the effects of a fire as produced by the heat pulse on the biotic and abiotic components of an ecosystem (Agee 1996; Keeley 2009), and is generally evaluated after fire has burned though an area (Andariese and Covington 1986).

Flame length is a good surrogate for fireline intensity. Above the flames of the surface fire in a forest, there is a zone within which foliage will be scorched and killed by hot gasses rising from the flames. To die by cambial damage alone, a tree must be girdled, and any fire intense enough to girdle a large tree is usually intense enough to scorch all of its foliage as well, even without any crown fire (Figure 36). Death usually follows quickly from complete crown scorch in ponderosa

pine, but may take several years following girdling (Van Wagner 1972).



Figure 36. Lethally scorched trees from a high severity, low intensity surface fire. Note the lack of crown fire.

Crown fire is always high severity fire, but high severity fire is not always crown fire. A low-intensity fire that is creeping slowly across a forest floor that has decades of accumulated fuels may produce high severity effects because the residence time is sufficient to allow lethal levels of heat to transfer into the soil, tree and shrub cambiums, and roots/seeds/biota in the upper layer of soil, (Valette et al. 1994, Lata 2006) and/or heat is trapped under a closed canopy, producing a lethal level of crown scorch. When surface fire burns in a forest with a closed canopy, sufficient heat can build up under the canopy to lethally scorch trees.

Historically, ponderosa pine forests of the southwest supported, low severity surface fires. Passive crown fire occurred under some conditions, but active crown fire was rare (Cooper 1960, Covington and Moore 1994, Fulé et al. 2003, Moir and Deterich 1988). Discussions of severity for existing conditions were based on fire type, surface fuel loading, and vegetation type.

Appendix D: Analysis of the Strategic Treatments for Fire Use Alternative

Basis for analysis

This analysis attempts to capture both the spirit and intent of the Center for Biological Diversity's submitted Strategic Treatments for Fire Use (hereafter referred to as the Strategic Treatments Alternative) alternative as outlined in the May 2018 document of the same name. At its core, the proposed alternative includes three tiers of management, with different strategies applied to each tier.

Tier 1 – Community Protection: represent the highest priority for treatment and constitute the area within ½ mile of homes and critical infrastructure.

Tier 2 – Strategic Thinning Treatment: selected through an optimization analysis, these areas would be the second level of priority for mechanical treatments utilizing the Flexible Toolbox Approach (now known as the condition-based management approach). The identification of these treatment locations would follow an optimization process to leverage proposed treatments to alter landscape scale fire behavior.

Tier 3 – Fire Use: these areas would not receive mechanical treatment but would instead use both management and natural ignitions at frequencies commensurate with natural fire regimes to achieve resource benefits.

This analysis leverages existing data, information and modeling to the extent practicable to develop optimization surfaces for the Rim Country project area and provides some initial analysis of resulting fire behavior metrics for comparison to the alternatives previously analyzed.

Optimization process and analytical assumptions

Core to the development of the Strategic Treatments Alternative is the utilization of an optimization analysis to identify Tier 2 acres in the project area. A primary premise of the optimization process employed here is that treatment on the acres on the landscape that are most likely to burn with high severity not only mitigate the highest hazards, but also provide benefits to the larger landscape by mitigating and modifying the way fire moves and spreads across a landscape.

In order to perform the optimization of strategic treatments, we need to evaluate two key metrics across the entire landscape: 1) burn probability and 2) fire intensity. Taken together we can evaluate the portions of the landscape that are most likely to burn with undesirable fire effects in any given year.

To develop an initial approximation of the tier 2 areas, we utilized the large fire simulator (FSim) to model potential fire occurrence and intensity across a range of weather conditions representative of local fire seasons. This model helps us determine for each location on the landscape both a relative and absolute likelihood of fire occurring Figure 37. This tool also helps us understand the intensity with which each stand is predicted to burn under the range of weather conditions we experience and allows us to quantify the likelihood of areas burning with different intensities.

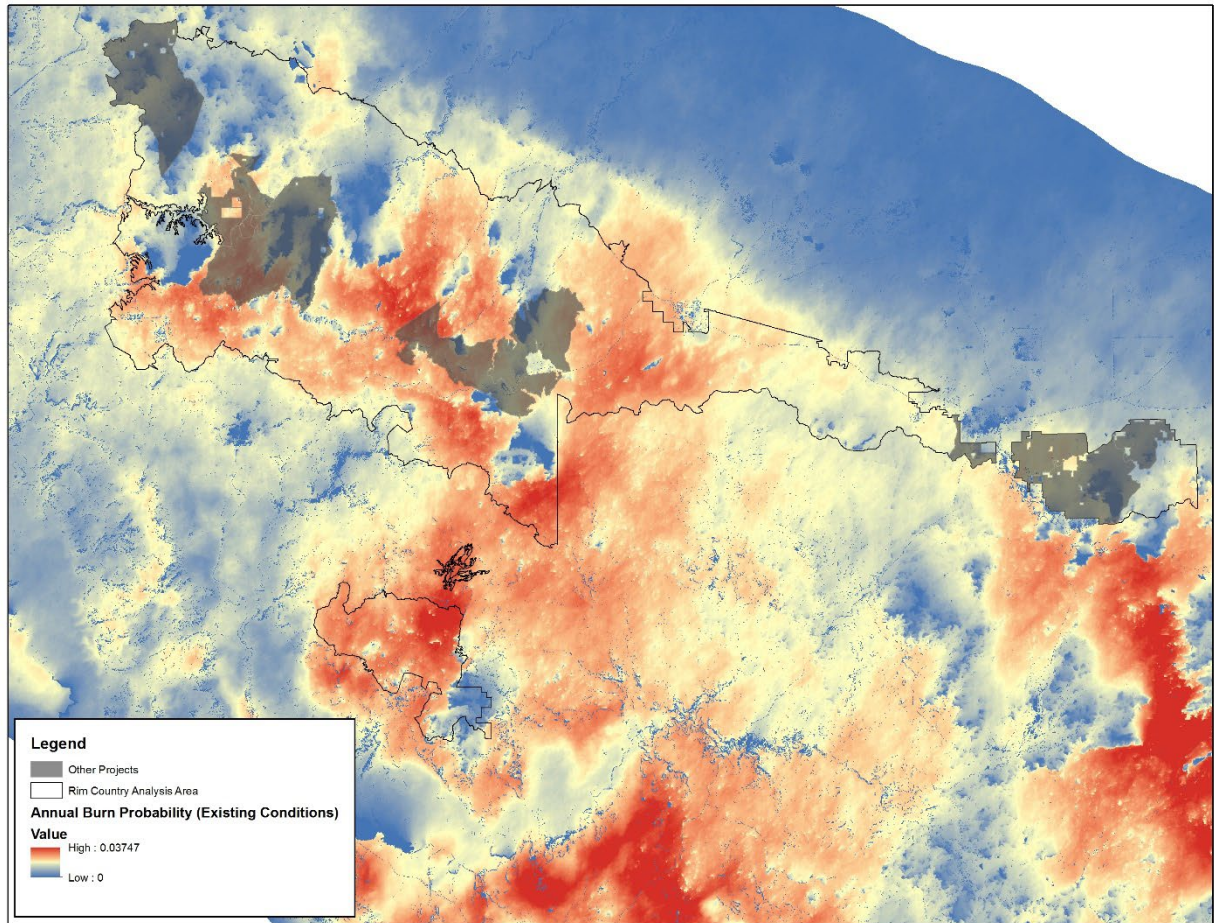


Figure 37. Landscape Burn Probability

Following an initial literature review on the topic, multiple potential fire intensity threshold have been identified. To further explore the implications of the different threshold values, three potential landscape scenarios have been developed. Each identifies which acres on the landscape would receive Tier 1, 2, or 3 style treatments. The difference between the three scenarios is in how conservative the threshold fire intensity level is for designing the strategic treatment zones⁵. Comparing the three gives us a reasonable range of variance to better understand the benefits and tradeoffs of this proposed alternative. If appropriate, more thorough modeling can help determine the appropriate scenario among the three.

⁵ The three scenarios share the same burn probability with a threshold with a 20% probability of a stand burning over a 50-year period or an annual probability of 0.4% (following Krofcheck, DJ, Remy, CC, Keyser, AR, Hurteau, MD (2019) Optimizing Forest Management Stabilizes Carbon Under Projected Climate and Wildfires. *Journal of Geophysical Research: Biogeosciences* **124**, 3075-3087. Krofcheck et. al. 2019)

Scenario 1: This scenario represents the least conservative fire intensity threshold utilizing a 8 foot flame length exceedance probability. The resulting management tiers based on the optimization at this level are represented in Figure 38. Note that the assumption to date is that areas identified through optimization for Tier 2 acres would receive the same prescription they would have under the modified preferred alternative. As a result of resource conflicts, not all tier 2 acres identified in the map would receive potential mechanical treatment. This assumption will need to be further vetted with the IDT.

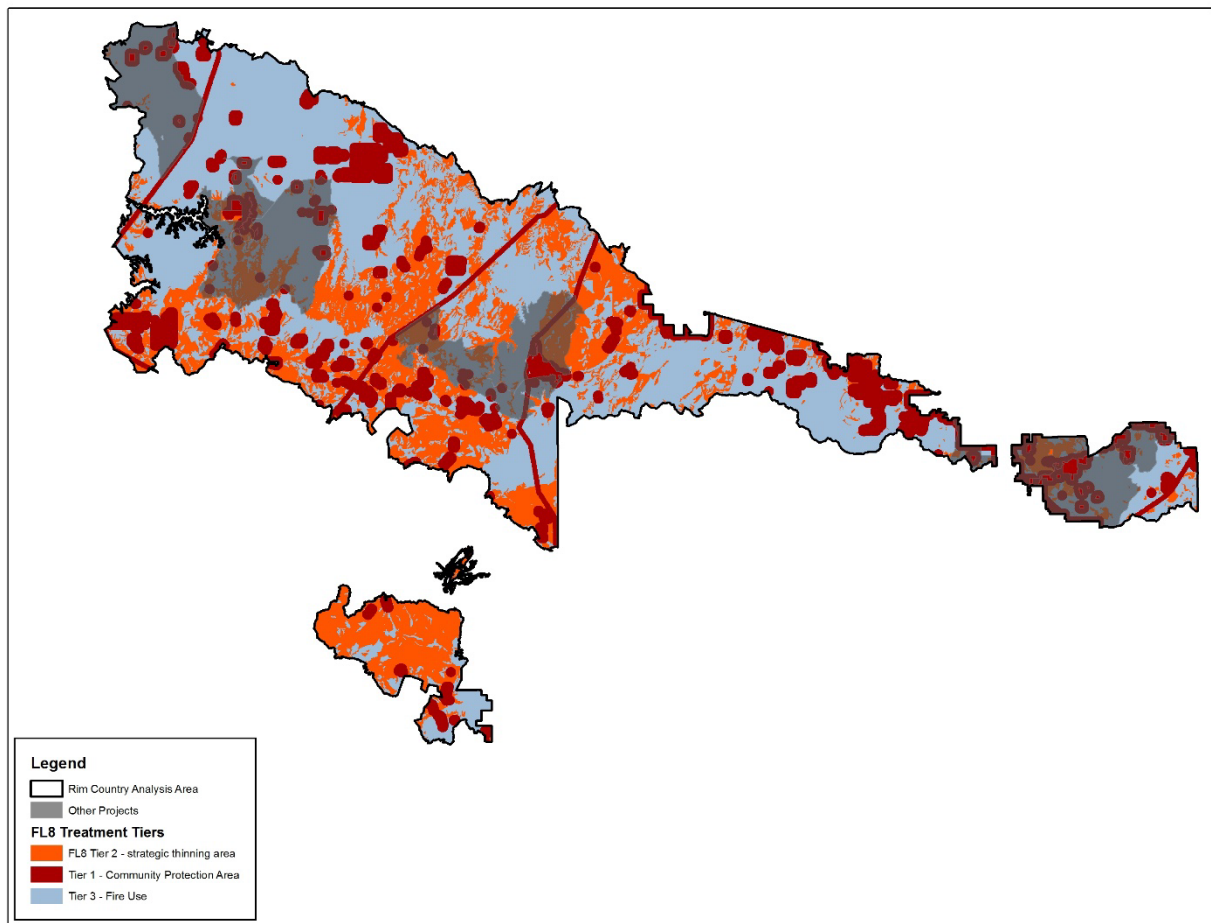


Figure 38. Scenario 1 is the least conservative, utilizing an 8ft flame length exceedance probability factor.

Scenario 2: This scenario represents a middle of the road fire intensity threshold utilizing a 6-foot flame length exceedance probability. The resulting management tiers based on the optimization at this level are represented in Figure 39. As with the other scenarios, the assumption to date is that areas identified through optimization for Tier 2 acres would receive the same prescription they would have under the modified preferred alternative. As a result of resource conflicts, not all tier 2 acres identified in the map would receive potential mechanical treatment. This assumption will need to be further vetted with the IDT.

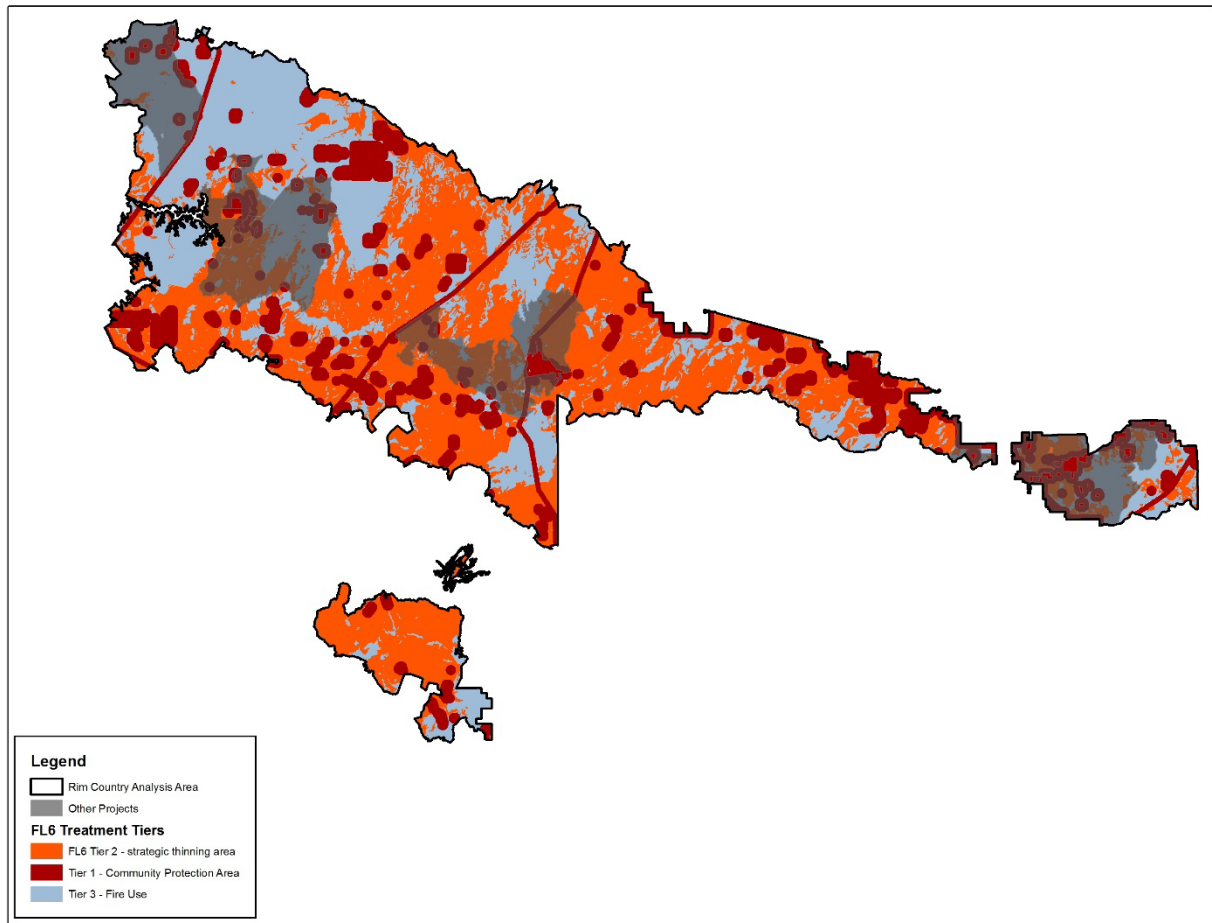


Figure 39. Scenario 2 is moderately conservative, utilizing an 6ft flame length exceedance probability factor.

Scenario 3: This scenario represents the most conservative fire intensity threshold utilizing a 4-foot flame length exceedance probability. The resulting management tiers based on the optimization at this level are represented in Figure 40. As with the other scenarios, the assumption to date is that areas identified through optimization for Tier 2 acres would receive the same prescription they would have under the modified preferred alternative. As a result of resource conflicts, not all tier 2 acres identified in the map would receive potential mechanical treatment. This assumption will need to be further vetted with the IDT.

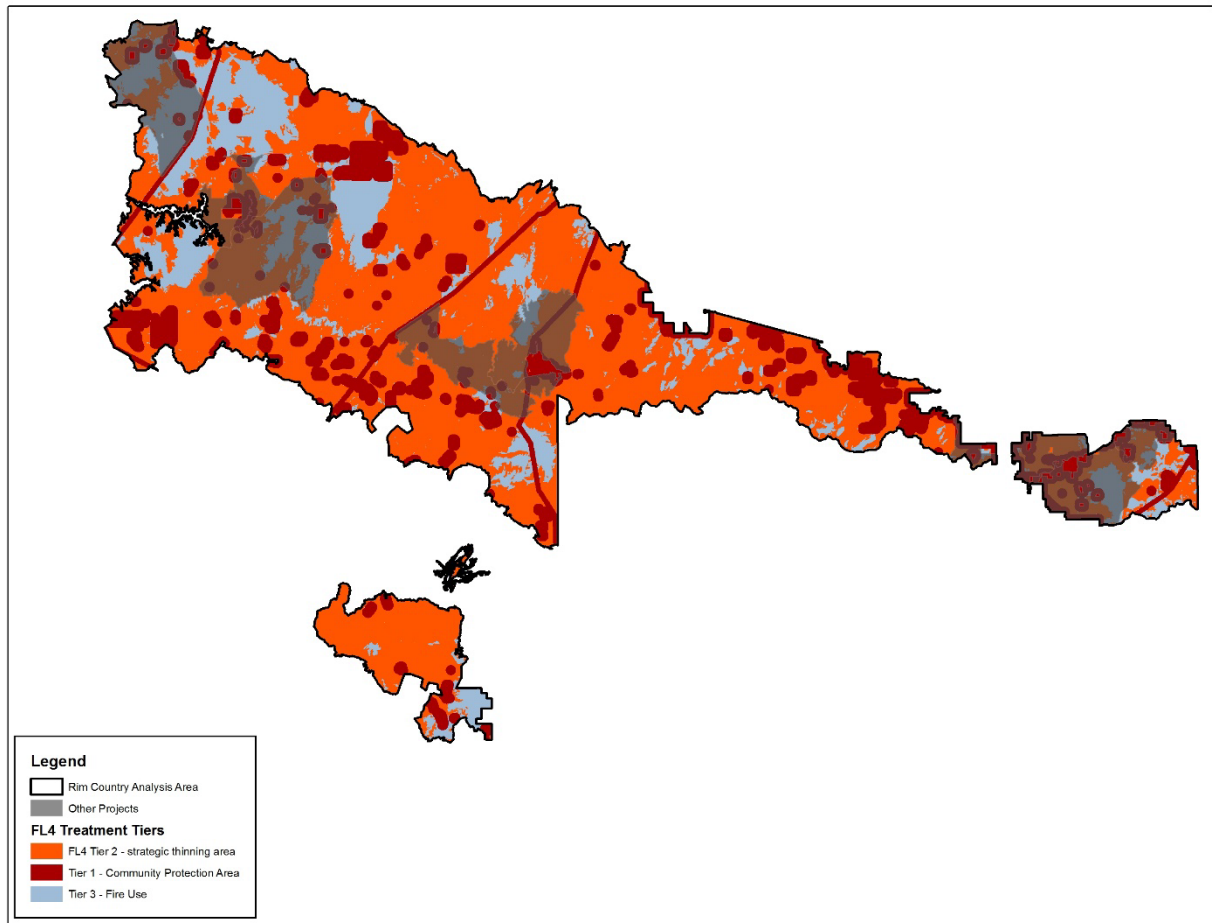


Figure 40. Scenario 3 is the most conservative, utilizing an 4ft flame length exceedance probability factor.