



June 18, 2018

Calvin Joyner, Regional Forester
US Forest Service, Southwestern Region
333 Broadway SE
Albuquerque, NM 87102

Via email to: objections-southwestern-regional-office@fs.fed.us and objections-southwestern-coconino@fs.fed.us

RE: Cragin Watershed Protection Project

Dear Regional Forester Joyner,

Please accept this Objection from the Center for Biological Diversity (“Center”) regarding the Cragin Watershed Protection Project (“CWPP”) on the Blue Ridge Ranger District of the Coconino National Forest. The legal notice announcing the objection period was published in the Arizona Daily Sun on Sunday, May 20, 2018. The 30-day objection period began the following day (36 CFR 218.6(b)) and ends on Tuesday, June 19, at 11:59pm (36 CFR 218.6(a)), making this submission timely. The Center has been actively involved in the CWPP as an engaged stakeholder from the early stages of the project. We submitted scoping comments on April 11, 2016, and commented on the Draft EA on May 30, 2017. In addition we have participated in a number of in-person stakeholders meetings, including but not limited to a public meeting on June 7, 2017, a stakeholders meeting on June 13, 2017, a field trip on December 14, 2017, and a stakeholders meeting on May 10, 2018.

Throughout the entire period of our involvement in this project we have advocated for the inclusion of the collaboratively developed Old and Large Tree Retention Strategy (“Strategy”) developed over the course of several years by the 4FRI Stakeholders Group. In all of our comments and in-person communications we have been clear about the importance of utilizing this approach to old and large tree retention, especially as the CWPP is nestled within the larger 4FRI landscape. The project record will clearly document our continued interest in this outcome. But it is with great disappointment that the CWPP Final EA has not included the Strategy, and as such we are Objecting to the project on account of this matter. Of primary importance is that the CWPP Old and Large Tree Implementation Plan is not consistent with the 4FRI Strategy as adopted by the Forest Service as the Modified Old and Large Tree Implementation Plan (1st 4FRI EIS, Appendix D, Section D), and in fact rolls back hard-earned protections for large trees that are very much relevant to the CWPP landscape, given its contiguity with the greater 4FRI landscape. The following items detail the substance of this Objection.

Objection Issue 1: Large Conifer Tree Retention in Relation to Large Oak Trees

The CWPP Final EA (at page 422, Appendix B: Project Design Features, Best Management Practices and Project Monitoring) states that “*In MSO Recovery Habitat...Trees larger than 18 inches may be removed to manage for large oaks in conformance with the old and large tree implementation plan.*” This statement appeared in the CWPP Final EA, but does not appear in the CWPP Draft EA. In addition to the surprise of discovering this alarming proposal, this management direction stands in contrast to the 2012 MSO Recovery Plan (page 268, emphasis added), which states that:

“Retain Large Trees. In particular, removing large trees in a stand identified as habitat could reduce its suitability as nesting habitat or increase the time required to develop suitable nesting habitat. Because it takes many years for trees to reach large size, we recommend that trees ≥ 46 - cm (18 inches) d.b.h. not be removed in stands designated as recovery nest/roost habitat unless there are compelling safety reasons to do so or if it can be demonstrated that removal of those trees will not be detrimental to owl habitat.”

Nowhere in the 2012 MSO Recovery Plan does it state that removal of trees larger than 18” is needed for MSO recovery. Coconino National Forest Plan guideline FW-WFP-G-1 states that “*habitat management objectives and species protection measures from approved recovery plans should be applied to activities occurring within federally listed species habitat to promote recovery of the species.*” As the 2012 MSO Recovery Plan recommends against removal of trees greater than 18” in Recovery Habitat, we argue that the allowance of removing trees greater than 18” d.b.h. is additionally in violation of Plan guideline FW-WFP-G-1.

Also, the 4FRI Large and Old Tree Implementation Plan (4FRI Final EIS, Appendix D, page 52, emphasis added) states that a Desired Condition is that “*In Mexican Spotted Owl Restricted Habitat...Within 30 feet of oak 10- inch diameter at the root collar or larger, **post-settlement mixed conifer trees up to 18 inches d.b.h.** (that do not have interlocking crowns with oak) are not restricting oak development.*” This guidance from the 4FRI Large and Old Tree Implementation Plan makes clear that removing trees over 18” d.b.h. is not permitted under the exceptions for application within Ponderosa Pine/Gambel Oak Forest.

Whereas, the CWPP Final EA statement that in MSO Recovery Habitat “*Trees larger than 18 inches may be removed to manage for large oaks in conformance with the old and large tree implementation plan*” was added following the publication of the CWPP Draft EA, and;

Whereas, this statement is not supported by the 2012 MSO Recovery Plan, and therefore this statement is non-compliant with Forest Plan guideline FW-WFP-G-1, and;

Whereas this statement is not consistent with the 4FRI Old and Large Tree Implementation Plan guidance for large tree removal exceptions in Ponderosa Pine/Gambel Oak Forest;

We therefore Object to the reduction in large tree protection as it relates to preserving oak trees, and request that this guiding statement is removed from the CWPP Final EA Appendix B: Project Design Features, Best Management Practices and Project Monitoring, and the original language provided in the CWPP Draft EA is left unchanged, consistent with the 4FRI Old and Large Tree Implementation Plan, to read: *“In MSO recovery habitat, manage for large oaks by removing conifers up to 18 inches d.b.h. that do not meet the “old tree” definition within 30 feet of oak 10 inches diameter at root collar or larger.”*

Objection Issue 2: Broad WUI Definition Renders CWPP Large Tree Implementation Plan Meaningless

Appendix A in the CWPP Final EA describes the Large Tree Implementation Plan that would be utilized by forest managers in implementing the preferred alternative. Exception-categories from the 4FRI Old and Large Tree Implementation Plan that were not relevant to CWPP were removed, resulting in three exception-categories remaining relevant to CWPP:

- Ponderosa Pine/Gambel Oak Forest (Pine-Oak PIPO/QUGA)
- Within Stand Openings
- Heavily-Stocked Stands (with High Basal Area) Generated by a Preponderance of Large, Young Trees

Two more exception categories were added that are unique to CWPP:

- Where necessary to meet protection of facilities and structures, public and operational safety goals, and other community protection needs.
- To remove large trees within the ponderosa pine cover type that obstruct the viewsheds from the Baker Butte Lookout Tower.

We are not objecting to the site-specific removal of large trees at Baker Butte, but the “Fire Risk Reduction Operational Safety Needs or WUI Protection” category, as it is called on page 412 of the Final EA, is overly broad and disingenuous. Figure 37 in the Final EA (page 125, emphasis added) identifies nearly the entire project area as WUI:

*“Within CWPP, there is approximately 17,000 acres of WUI sites and values at risk, which includes private property, the Cragin Project dam infrastructure and facilities, powerlines, DOPLAR radar site, campgrounds and lookout towers (Figure 37). **The three municipal water supply watersheds are also considered as WUI in this project and amount to about 45,485 acres**”*

Based on this definition, the Large Tree Implementation Plan would permit large tree removal anywhere across more than 80% of the CWPP project area. Without clarification or

reformulation, this renders the Large Tree Implementation Plan meaningless as there would be no limitation on the removal of large trees across most of the project area.

This component of the Large Tree Implementation Plan was not included in the CWPP Draft EA. In that document, a similar exception to the Large Tree Implementation Plan was offered that stated (CWPP Draft EA, page 51, emphasis added):

*“Exceptions to the large tree implementation plan include ecological conditions where large, post settlement trees may (or should) be removed to move toward or meet desired conditions. Exceptions include the following for the CWPP: **As necessary to meet community protection, public and operational safety goals.**”*

No additional information was provided to expand on what acreage might be included, and no mention of number of acres was given. However, there was no indication that this exception would cover more than 80% of the project area. In fact, page 2 of the CWPP Draft EA stated that

“26% of the project area consists of WUI values at risk and surrounding buffers consisting of private lands, critical communications sites, high voltage transmission lines, water pipelines, campgrounds, weather stations, fire towers, historical cabins and Forest Service administrative sites that, if destroyed by fire, would result in hardship to communities.”

Those ~17,000 acres are shown in Figure 3 in the CWPP Draft EA, and the comparison between that map and Figure 37 in the Final EA is startling.

In addition to making any large tree protection measures meaningless, the “Fire Risk Reduction Operational Safety Needs or WUI Protection” category would further increase interspaces beyond the upper limit of vegetation community desired conditions and further decrease canopy cover as a desired condition for all forested vegetative communities across 80% of the project area. The desired condition reads as follows (CWPP Final EA, page 412):

“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.”

Constraint on the use of intensive WUI treatments across virtually the entire CWPP landscape must be clarified. The elimination of large tree protections in addition to the application of the increased interspace across 80% of the project is not consistent with the full range of objectives of the project, including protection of threatened and endangered species habitats. Furthermore, an unconstrained reduction in the limitations placed on large tree removal is not compliant with

Objection to the Cragin Watershed Protection Project

the Healthy Forest Restoration Act, (HFRA) Section 102(e)(2) which mandates that the Forest Service, when carrying out covered projects using HFRA authority, are to

*"fully maintain, or contribute toward the restoration of, the structure and composition of old-growth stands according to the pre-fire suppression old-growth conditions characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health, **and retaining the large trees contributing to old-growth structure.**" (emphasis added)*

Whereas, the Forest Service has stated in multiple comment responses to the Center that large tree protection is a component of the CWPP, including in a May 2017 response to our scoping comments that states:

*"The issue of protecting large and old trees has been integrated into the proposed action via the implementation plan to protect large and old trees. **This plan does not only apply to areas outside of WUI, but to the entire project area,**" and*

Whereas, *"The old and large tree retention implementation plans adopted under the First 4FRI EIS Record of Decision were integrated into the Cragin proposed action and meets this direction in the Healthy Forest Restoration Act to contribute toward the restoration of the structure and composition of old growth stands"* (November 2017 Forest Service response to public comments on the CWPP Draft EA), and;

Whereas, the CWPP Final EA adopted three existing, relevant 4FRI Old and Large Tree Implementation Plan exceptions, and;

Whereas, the CWPP Final EA identifies the entirety of the municipal watersheds which drain into CC Cragin Reservoir as WUI, and;

Whereas, the 2018 Coconino National Forest Plan established a desired condition for WUI (FW-WUI-DC-6) that is being applied across 80% of the CWPP project area, and;

Whereas, a desired condition for CWPP's expanded WUI that was not provided in the CWPP Draft EA allows for the increase of interspace above established desired conditions;

We therefore Object to the expansion of intensified WUI treatments to include the entirety of the municipal watersheds which feed CC Cragin Reservoir, and request that language is clarified that clearly assigns WUI treatments to only the ~17,000 acres that consist of private lands, critical communications sites, high voltage transmission lines, water pipelines, campgrounds, weather stations, fire towers, historical cabins and Forest Service administrative sites. Intensive WUI treatments should not be applied across 80% of the CWPP project area, and by extension the Large Tree Implementation Plan should apply to all acres outside of the ~17,000 WUI. We are hopeful that this is simply an issue of language needing to be reformulated for clarity, and not an intentional abdication of the duty to protect large trees as required by HFRA.

Objection Issue #3: CWPP Large Tree Definition is not Consistent with 4FRI Direction

In our April 11, 2016 scoping comments on the CWPP, we requested that the stakeholder-developed 4FRI Old and Large Tree Retention Strategy should be adopted for the CWPP analysis. In our May 30, 2017 comments on the CWPP Draft EA, we identified numerous ways that the Strategy was not wholly included in the CWPP Draft EA, and we argued that the definition of large trees being used in the CWPP was inconsistent with stakeholder direction in 4FRI, as established in the 4FRI NEPA record and in the Stakeholders Old and Large Tree Retention Strategy. In our May 30, 2017 comments on the CWPP Draft EA, we stated:

“Also, the 4FRI Final EIS states that “large post-settlement trees, as defined by the socio-political process, are those that are 16 inches d.b.h. or larger.” The Final EA should clarify that the diameter threshold is indeed 16”, not 18”, and rectify this clarification to the treatment stratum as necessary. The CWPP’s move towards using the VSS 5/6 classes as the threshold does not accurately reflect the 4FRI Strategy. Center participants at a 2016 field tour of the proposed action supported the project and it was not suggested at that time that the 4FRI Strategy would be altered in the CWPP. If this issue is not remedied in the Final EA it is likely that we will be forced to file an objection to the project.”

In a November 11, 2017 response to this comment, the Forest Service responded:

“The 4FRI Large tree retention plan identifies large trees as 16 inches d.b.h. or larger, but in the next few sentences identifies that the 18” d.b.h. threshold is more useful for large tree retention implementation, “Trees greater than or equal to 18 inches d.b.h. represent VSS 5 and 6. VSS 5 and 6 represent the largest and (sometimes) oldest trees. These size classes best correspond with the successional age classification system that was developed to address the forest dynamics of southwestern ponderosa pine.”

The large and old tree implementation plan included in CWPP can be updated to include this same language, but it is not expected to change the interpretation or implementation of the implementation plans.

In addition, specific direction written into the large and old tree implementation plan repeatedly identify 18” as the diameter limit for removing ponderosa pine such as the common direction repeated 5 separate times to, “Remove ponderosa pine trees up to 18 inches d.b.h. that do not meet the old tree definition...”

The claim that the 4FRI NEPA record identifies that the 18” d.b.h. threshold is more useful for large tree retention implementation is false. The comment given above provides an interpretation of the 1st 4FRI Final EIS Appendix D, which simply stated that (Appendix D, page 46):

Objection to the Cragin Watershed Protection Project

“For the purpose of this document, large post-settlement trees, as defined by the socio-political process, are those that are 16 inches d.b.h. or larger. Trees greater than or equal to 18 inches d.b.h. represent VSS 5 and 6. VSS 5 and 6 represent the largest and (sometimes) oldest trees. These size classes best correspond with the successional age classification system that was developed to address the forest dynamics of southwestern ponderosa pine.”

We stand by our assertion that the 4FRI Large Tree Implementation Plan is intended to conserve large trees as defined as those 16” d.b.h. and up, with exceptions as defined solely in the Large and Old Tree Implementation Plan. The reference to VSS 5 and 6 tree size classes was not a clear statement that a “large” tree is one that is over 18”, it simply stated the sizes of VSS 5 and 6 trees and that they correspond well with existing classification systems. That statement alone did not, and does not, and never will suggest that the VSS system is more useful for large tree retention. To the contrary, the 1st 4FRI Final EIS repeatedly identifies large trees as those greater than 16” d.b.h. For example:

- The Summary to the Final EIS (page v) and the Record of Decision (page 6) both state that *“Large post-settlement trees, as defined by a socio-political process, are those greater than 16 inches d.b.h.”*;
- In Chapter 1 of the Final EIS (page 9), the Purpose and Need for Action states that *“A key objective is to comply with the Omnibus Public Land Management Act of 2009 criteria for landscape-scale restoration, and achieve community, wildlife and forest protection while retaining as many large trees (greater than 16 inches d.b.h.) as possible”*;
- Later in Chapter 1, the Final EIS states (page 15) that *“While some large trees would be removed to accomplish ecological objectives or public safety objectives around communities, there is a need to retain as many large trees (larger than 16 inches d.b.h.) as possible.”* This wording is repeated verbatim in the Record of Decision at page 24, and again a similar phrase is offered in the Record of Decision, stating that in the context of 4FRI’s compliance with the Collaborative Forest Landscape Restoration Act that *“This decision acknowledges that while some large trees may be removed to accomplish ecological objectives or public safety objectives around communities, there is a need to retain as many large trees (larger than 16 inches d.b.h.) as possible.”*
- In discussing the Issue of Conservation of Large Trees, the Final EIS (page 40) states that *“Large post-settlement trees, as defined by the stakeholders’ socio-political process, are those greater than 16 inches d.b.h....alternative C responds to this issue by incorporating the key components of the LTRS and focusing on ecological desired conditions.”*
- The Record of Decision (page 12) identifies Alternative C as the preferred alternative, and states that *“Key components of the stakeholder-created Large Tree Retention Strategy are incorporated into the alternative’s implementation plan.”* On page 13, the ROD clearly refers

Objection to the Cragin Watershed Protection Project

managers to the Old Tree Implementation Plan (FEIS volume 2, Appendix C), and the implementation plan (FEIS volume 2, Appendix D) for project design features, all of which are consistent with the establishment of 16” as the threshold for definition as a large tree.

Now, we would like to address the second point in the Forest Service’s November 11, 2017 response to our earlier comments. The reference to 5 separate repeated common directions that would permit removal of ponderosa pine up to 18” d.b.h. was actually not included in the 1st 4FRI EIS Large and Old Tree Implementation Plan. This specific quote can be found six times in Section A (Management Direction, Desired Conditions, and Treatment Design) of the Final EIS Appendix D (Selected Alternative Implementation Plan with Errata and Objection Resolution Modifications). It is not recorded in Section C (Old Tree Implementation Plan) or in Section D (Modified Large Tree Implementation Plan). The six instances where this guidance is used are listed below, and in all six cases the allowance to cut up to 18” d.b.h. is restricted to occasions where removal of a large young tree can reduce crown competition with an isolated or individual old tree. Each allowance includes identical criteria that specify the application of the guidance:

1) In describing Management Direction, Desired Conditions, and Treatment Design in *Landscapes Outside of Goshawk Post-fledging Areas, WUI55, UEA40, UEA25 and UEA10 Mechanical Thin and Burn Treatments Design* on page 15 of Appendix D:

“Manage for the sustainability of individual/isolated old ponderosa pine trees as defined in the old tree implementation plan (section C) by reducing crown competition and increasing growing space adjacent to these trees. Remove ponderosa pine trees up to 18 inches d.b.h. that do not meet the old tree definition: (1) within a 50-foot radius that are in the intermediate or suppressed crown positions, and, (2) that would eliminate direct crown competition on two of the four sides of the old tree.”

2) In describing Management Direction, Desired Conditions, and Treatment Design in *Landscapes Outside of Goshawk Post-fledging Areas Intermediate Thin (IT) 40, 25, and 10 Mechanical Thin and Burn Treatments Design* on page 19 of Appendix D:

“Manage for the sustainability of individual/isolated old ponderosa pine trees as defined in the old tree implementation plan (section C) by reducing crown competition and increasing growing space adjacent to these trees. Remove ponderosa pine trees up to 18 inches d.b.h. that do not meet the old tree definition: (1) within a 50-foot radius that are in the intermediate or suppressed crown positions, and, (2) that would eliminate direct crown competition on two of the four sides of the old tree.”

3) In describing Management Direction, Desired Conditions, and Treatment Design in *Landscapes Outside of Goshawk Post-fledging Areas Stand Improvement (SI) 40, 25, and 10 Mechanical Thin and Burn Treatments Design* on page 22 of Appendix D:

Objection to the Cragin Watershed Protection Project

“Manage for the sustainability of individual/isolated old ponderosa pine trees as defined in the old tree implementation strategy by reducing crown competition and increasing growing space adjacent to these trees. Remove ponderosa pine trees up to 18 inches d.b.h. that do not meet the old tree definition: (1) within a 50-foot radius that are in the intermediate or suppressed crown positions and (2) that would eliminate direct crown competition on two of the four sides of the old tree.”

- 4) In describing Management Direction, Desired Conditions, and Treatment Design in *Dispersal Post-fledging Family Areas / Post-fledging Family Areas in Uneven-aged Treatment (UEA) Types 40, 25, and 10 Mechanical Thin and Burn Treatments Design* on pages 27-28 of Appendix D:

“Manage for the sustainability of individual/isolated old ponderosa pine trees as defined in the old tree implementation plan (section C) by reducing crown competition and increasing growing space adjacent to these trees. Remove ponderosa pine trees up to 18 inches d.b.h. that do not meet the old tree definition: (1) within a 50-foot radius that are in the intermediate or suppressed crown positions, and (2) that would eliminate direct crown competition on two of the four sides of the old tree.”

- 5) In describing Management Direction, Desired Conditions, and Treatment Design in *Dispersal Post-fledging Family Areas / Post-fledging Family Areas Intermediate Thin (IT)40, 25 and 10 Mechanical Thin and Burn Treatments Design* on page 30 of Appendix D:

“Manage for the sustainability of individual/isolated old ponderosa pine trees as defined in the old tree implementation plan (section C) by reducing crown competition and increasing growing space adjacent to these trees. Remove ponderosa pine trees up to 18 inches d.b.h. that do not meet the old tree definition: (1) within a 50-foot radius that are in the intermediate or suppressed crown positions, and (2) that would eliminate direct crown competition on two of the four sides of the old tree.”

- 6) In describing Management Direction, Desired Conditions, and Treatment Design in *Dispersal Post-fledging Family Areas / Post-fledging Family Areas Stand Improvement (SI)40, 25, and 10 Mechanical Thin and Burn Treatments Design* on page 34 of Appendix D:

“Manage for the sustainability of individual/isolated old ponderosa pine trees as defined in the old tree implementation strategy by reducing crown competition and increasing growing space adjacent to these trees. Remove ponderosa pine trees up to 18 inches d.b.h. that do not meet the old tree definition: (1) within a 50-foot radius that are in the intermediate or suppressed crown positions, and, (2)

Objection to the Cragin Watershed Protection Project

that will eliminate direct crown competition on two of the four sides of the old tree.”

In addition, similar allowance is provided in situations where preservation of large, old oak trees is a primary objective. In this case, ten instances identify where and when a large young ponderosa pine, up to 18” d.b.h., can be removed to reduce competition with oaks greater than 10” DRC:

1) In describing Management Direction, Desired Conditions, and Treatment Design in *Landscapes Outside of Goshawk Post-fledging Areas, WUI55, UEA40, UEA25 and UEA10 Mechanical Thin and Burn Treatments Design* on page 17 of Appendix D:

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h. and (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks.”

2) In describing Management Direction, Desired Conditions, and Treatment Design in *Landscapes Outside of Goshawk Post-fledging Areas Stand Improvement (SI) 40, 25, and 10 Mechanical Thin and Burn Treatments Design* on page 22 of Appendix D:

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h., and, (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks.”

3) In describing Management Direction, Desired Conditions, and Treatment Design in *Landscapes Outside of Goshawk Post-fledging Areas Pine Sage Mechanical and Burn Treatment Design* on page 24 of Appendix D:

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h. and (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or

Objection to the Cragin Watershed Protection Project

suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks.”

- 4) In describing Management Direction, Desired Conditions, and Treatment Design in *Savanna/Grassland Restoration Mechanical and Burn Treatments Design* on page 22 of Appendix D:

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h., and, (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks.”

- 5) In describing Management Direction, Desired Conditions, and Treatment Design in *Dispersal Post-fledging Family Areas / Post-fledging Family Areas in Uneven-aged Treatment (UEA) Types 40, 25, and 10 Mechanical Thin and Burn Treatments Design* on page 29 of Appendix D:

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h., and (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks.”

- 6) In describing Management Direction, Desired Conditions, and Treatment Design in *Dispersal Post-fledging Family Areas / Post-fledging Family Areas Intermediate Thin (IT)40, 25 and 10 Mechanical Thin and Burn Treatments Design* on page 31 of Appendix D:

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h., and, (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks.”

7) In describing Management Direction, Desired Conditions, and Treatment Design in *Dispersal Post-fledging Family Areas / Post-fledging Family Areas Stand Improvement (SI)40, 25, and 10 Mechanical Thin and Burn Treatments Design* on page 34 of Appendix D:

“Manage for the sustainability of individual/isolated old ponderosa pine trees as defined in the old tree implementation strategy by reducing crown competition and increasing growing space adjacent to these trees. Remove ponderosa pine trees up to 18 inches d.b.h. that do not meet the old tree definition: (1) within a 50-foot radius that are in the intermediate or suppressed crown positions, and, (2) that will eliminate direct crown competition on two of the four sides of the old tree.”

8) In describing Management Direction, Desired Conditions, and Treatment Design in *Dispersal Post-fledging Family Areas / Post-fledging Family Areas Stand Improvement (SI)40, 25, and 10 Mechanical Thin and Burn Treatments Design* on page 35 of Appendix D:

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h., and (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks.”

9) In describing Management Direction, Desired Conditions, and Treatment Design in *Dispersal Post-fledging Family Areas / Post-fledging Family Areas Pine Sage Mechanical and Burn Treatment Design* on page 36 of Appendix D:

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h., and, (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks”

10) In describing Management Direction, Desired Conditions, and Treatment Design in *Pinyon Juniper (PJ) Wildland-urban Interface Mechanical Thin and Burn Treatment Design* on page 39 of Appendix D:

Objection to the Cragin Watershed Protection Project

“Manage for the sustainability of large oaks by removing ladder fuels and overtopping trees. Remove ponderosa pine that are within 30 feet of the base of oak 10 inches diameter at the root collar or larger as follows: (1) On the southerly side of the oak (135 to 315 degrees) trees up to 18 inches d.b.h., and, (2) On the northerly side of the oak (316 to 134 degrees) trees in the intermediate or suppressed crown positions up to 18 inches d.b.h. Exceptions to removal will be trees that meet the old tree definition and trees that have interlocking crown with oaks.”

The 1st 4FRI EIS provides these exceptions in addition to the exceptions listed in the Appendix D, Section D of the Final EIS. Also, trees up to 17.9” could be cut in certain MSO PACs, but not removed. Otherwise, the 1st 4FRI EIS NEPA record clearly identifies a large tree as one greater than 16” d.b.h. In contrast, the Glossary provided in the CWPP Final EA (page 402) defines a “large tree” as: “A large tree as defined in the revised Mexican Spotted Owl Recovery Plan (2012) is a tree greater than 18-inch d.b.h.”

As stated above, we have repeatedly urged the Forest Service to adopt the stakeholder-developer Strategy from 4FRI, but we can accept the integration of the 4FRI Large Tree Implementation Plan as we have approved of that in the 1st 4FRI EIS. Unfortunately, neither the Strategy nor the 4FRI Large Tree Implementation Plan are integrated into CWPP without distortion. In the Forest Service’s November 11, 2017 response to our comments on the CWPP Draft EA, they stated that:

“We feel it is important to be consistent on the issue of large and old tree retention as it was approved with broad stakeholder support through the Four Forest Restoration Project Record of Decision rather than using a previous version developed by select stakeholders which was never approved through the NEPA process.”

For the many reason stated in this Objection, the CWPP approach to large tree protection is not consistent with the 4FRI model, despite the Forest Service having commented to us that it is.

Whereas, the Forest Service has repeatedly suggested that the 4FRI Large Tree Implementation Plan would be integrated into the CWPP, and;

Whereas, the 4FRI NEPA record is clear that a large tree is identified as one that is greater than 16” d.b.h, and;

Whereas, the 4FRI Implementation Plan, including the Large Tree Implementation Plan, clearly identifies specific situations where cutting conifers up to 18” d.b.h. is allowable, and;

Whereas HFRA requires authorized projects to retain and protect large trees;

Objection to the Cragin Watershed Protection Project

We therefore Object to the expanded removals of trees over 16” that are not covered by one of the legitimate exception categories established in the 1st 4FRI EIS, and request that the CWPP is brought into alignment with the letter and intent of the 1st 4FRI EIS Large Tree Implementation Plan.

Thank you for your consideration of our concerns over the CWPP Final EA. We are pleased with some of the changes that have been made as a result of our stakeholder interactions with the Forest Service so far in the project. Much improvement has been made since the early stages of the project, and the project can still be an effective management action to reduce the risk of uncharacteristic fire and degradation of the watershed. Additional protections for large trees as identified in this Objection will still enable the Forest Service to meet the project objectives and will ensure a more rapid restoration of old growth qualities, as required by HFRA. Please do not hesitate to contact me directly with questions or concerns, and I look forward to resolving these issues in a timely fashion, and permitting the project to begin implementation.

Sincerely,



Joe Trudeau
Southwest Advocate
Center for Biological Diversity
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cc: Laura Jo West, Forest Supervisor, Coconino National Forest
Linda Wadleigh, District Ranger, Blue Ridge Ranger District
Mike Dechter, Program Manager, Coconino National Forest