



November 11, 2019

Randall Walker, District Ranger  
North Kaibab Ranger District  
Kaibab National Forest  
430 S. Main  
Fredonia, AZ 86022

**RE: Kaibab Plateau Ecological Restoration Project Environmental Assessment**

Dear Mr. Walker,

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on your Kaibab Plateau Ecological Restoration Project (KPERP) Environmental Assessment (EA).

AZSFWC is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat improvement, hunter recruitment/ retention, and educating sportsmen and women on issues important to their passions. AZSFWC has 41 member, affiliate, and associate organizations representing more than 10,000 sportsmen and women who span the spectrum of hunting, angling, shooting and outdoor recreation groups and businesses across Arizona.

The North Kaibab Ranger District of the Kaibab National Forest (NKR) is of particular importance to our membership, being home to the iconic Kaibab mule deer herd. It also provides a host of other hunting and outdoor recreation opportunities across the landscape.

Like other National Forests in Arizona, the NKR has been adversely impacted by recent historical changes to that landscape, including severe wildfires, establishment and spread of noxious invasive weeds, loss of native understory and shrub vegetation, and expansion and infill of pinyon-juniper (PJ) woodlands. These changes have adversely impacted wildlife habitat, most importantly critical mule deer ranges on the western portion of the NKR. As a consequence, AZSFWC welcomes the proposed KPERP as an important step to help restore and maintain high-quality wildlife habitat and recreational opportunities into the future.

AZSFWC letter supporting Kaibab Plateau Ecological Restoration Project EA – 11-11-19

Arizona Sportsmen for Wildlife Conservation  
PO Box 75731 New River, AZ 85087

We have reviewed the KPERP EA and offer the following comments for your consideration.

AZSFWC understands that the NKR D has planned this effort in coordination with the Arizona Game and Fish Department (Department). We appreciate that collaborative approach and request the Forest continue working with the Department and other stakeholders while planning and implementing habitat restoration and improvement projects under the Proposed Action (PA). AZSFWC supports the full-landscape approach of the PA, which will benefit wildlife habitats across the NKR D while minimizing future NEPA requirements needed to meet these objectives.

Treatments in PJ plant communities will be particularly beneficial to mule deer; however, this part of the PA needs to be refined with greater detail. We note that the proposed mechanical treatments have limited acreage and will create a mosaic pattern. AZSFWC supports this conservative approach, which can meet overall habitat objectives for deer and other wildlife while hopefully avoiding appeals and potential litigation that have hamstrung controversial large-scale PJ clearing projects proposed on mule deer ranges in neighboring states.

We recommend that the KPERP PA be further refined, specifying the size range of cleared patches, their spatial arrangement, and the net amount of a given area that would be treated. The treatment designs should better reflect the inherent diversity of PJ habitats on the project area and address the full range of Desired Conditions articulated in the Kaibab Forest Plan. For example, it will be important to develop different treatment regimes for the PJ woodland and PJ sagebrush Potential Natural Vegetation Types listed in the EA. As appropriate, these should be further divided into areas that were historically occupied by savannah-type conditions, intermediate stage woodlands that have infilled since the onset of fire suppression, and persistent old-growth woodlands. Each of these PJ types provides a different, but important set of habitat conditions for wildlife.

AZSFWC understands there have been previous browse rejuvenation efforts on the NKR D that were very successful, including hand-tool lopping of decadent cliffrose plants on deer winter range. This treatment is not specifically covered in the PA and should be included in the final decision. The Department has some recommendations about this action which AZSFWC supports, particularly reducing plant height for optimum mule deer utilization. Finally, we recommend that KPERP planning and implementation be informed by similar projects on the NKR D that occurred there, including Ryan One.

As previously noted, extensive tracts of critical winter range on the NKR D have been impacted by large wildfires that removed cover and forage for deer. Many severely burned areas were subsequently dominated by cheatgrass and other noxious weeds. Recovery of native grasses and forbs, sagebrush, cliffrose and other browse plants has been slow. Patches of invasive weeds remain. We

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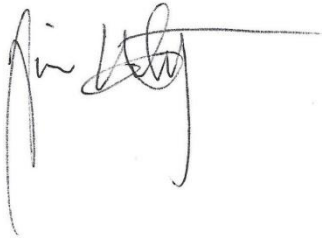
appreciate Design Elements in the PA that are intended to prevent further establishment and spread of invasives and control them where they occur.

However, we request that NKRD be particularly careful when applying treatments under the PA, particularly in areas impacted by previous wildfires. In the event of future wildfires that occur in the sagebrush shrubland type, we recommend that the PA include a provision for post-fire aerial seeding of sagebrush, which could hasten ecosystem and winter range recovery.

In summary, AZSFWC fully supports the KPERP project as outlined in the PA. We also support your continued collaboration with the Department in making sure the KPERP is not only a success for the landscape, but also the wildlife occurring on the Kaibab Plateau as delineated in the Arizona State Wildlife Action Plan.

Please keep us informed as the project moves forward. Thank you!

Yours in Conservation,

A handwritten signature in black ink, appearing to read "Jim Unmacht", with a long horizontal line extending to the right.

Jim Unmacht  
Executive Director