



June 28, 2021

Submitted via email: comments-southwestern-kaibab-north-kaibab@fs.fed.us

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

RE: Mangum Fire Emergency Actions/Hazard Tree Removal Project

Dear Mr. Walker:

Arizona Sportsmen for Wildlife Conservation (AZSFWC) appreciates the opportunity to comment on Scoping for the updated Categorical Exclusion (CE) for Mangum Fire Emergency Actions/Hazard Tree Removal Project (Project).

AZSFWC is a 501c-3 non-profit organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating outdoor enthusiasts on issues important to their passions. We have 40 member, affiliate and associate groups that reach across the spectrum of wildlife conservation, hunting, angling, shooting, outdoor recreation groups, and businesses from across Arizona. Our member groups represent over 16,000 people from Arizona.

The North Kaibab Ranger District of the Kaibab National Forest (NKRK) is of particular importance to our membership, being home to the iconic Kaibab mule deer herd and a diversity of other wildlife. It also provides a host of hunting and outdoor recreation opportunities across the landscape. The Mangum Fire is the latest large, high-severity wildfire to affect the NKRK, with widespread negative impacts to wildlife habitat and forest infrastructure. We sincerely appreciate recent efforts by the Arizona Game and Fish Department, Forest Service, and Natural Resource Conservation Service to address those impacts, which have included seeding of severely burned areas and repairs/upgrades to wildlife water developments affected by the fire.

As described in the Project proposal, there are large numbers of standing dead trees along Highway 89A, designated roads, dispersed camping areas, and non-

AZSFWC support for Mangum Fire Emergency Actions/Hazard Tree Removal Project – 6-28-21

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motorized trails within the fire footprint. AZSFWC understands the associated risk to public safety and supports removal of these hazard trees.

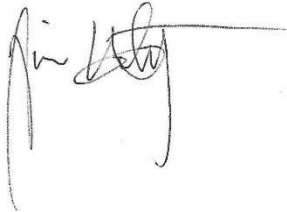
However, the CE does not appear to cover hazard trees proximate to wildlife water developments within the burn area. From a wildlife habitat standpoint, these waters are critical infrastructure, even more so as the Southwest enters a period of unprecedented drought. Our collective investment in repairing these facilities must be protected.

AZSFWC requests that the final CE be expanded to allow removal of adjacent hazard trees that are of sufficient height and diameter to damage perimeter fences, aprons, or other catchment components. We expect that removing these trees for commercial harvest might be impractical for several reasons, so it would make sense to leave the felled boles in place to provide downed woody habitat structure for wildlife.

We support the timely action to address hazard tree issues but are unsure how the Project could affect other pending actions on the NKR. Specifically, AZSFWC is aware of recent discussions about potential trades of standing dead tree volume from the Mangum Fire for uncut old growth on the Jacob Ryan Project. From our perspective, that is a sensible approach to conserve valuable wildlife habitat and defuse a highly controversial issue. The Forest Service should ensure that the proposed CE does not complicate or compromise that exchange process, should it go forward.

Thank you for the opportunity to comment on this proposal.

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