

## **Environmentalists outraged over Burnt Corral Project on Grand Canyon's northern edge**

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GRAND CANYON, Ariz. — Environmentalists are outraged that the Kaibab National Forest's proposed Burnt Corral Project near the Grand Canyon would cutdown some of the largest and oldest ponderosa pine trees in the Southwest and disturb nesting sites for Northern Goshawks.

The Burnt Corral project is planned for between Grand Canyon National Park's northwestern boundary and Jacob Lake.

Forest officials said the project is necessary to fight against catastrophic forest fires and improve overall forest health. They stated that protocols will be taken to protect the Northern Goshawk.

Public comments on the proposed project were taken through May 26.

Joe Trudeau, southwest conservation advocate for the Center for Biological Diversity, said old growth ponderosa pines should not be cut because they are essential to the health of the forest and important for bird and animal habitat.

Trudeau said Kaibab National Forest's environmental assessment (EA) report makes the Burnt Corral Project sound better than it is.

"You to have to read and critique the lines," he said about the 110 page report. "This is socially and ecologically unacceptable. There is a tremendous amount of consensus that they should not be cutting old growth trees."

Trudeau said the report breaks up the area into spatial units with some of the acreage assigned management for old growth trees. He said the report states that no trees will be cut if they are wider than 14 inches around.

However, Trudeau said many of the old growth trees are smaller than that. He said the report also states that old growth trees will not be cut, but there are exceptions. He said these exceptions are too many, meaning many old growth trees will be cut.

"A lot of this area has never been logged. I'm not anti-logging, but it's the dense small trees that should be cut and that's not their plan," he said.

Alicyn Gitlin, conservation coordinator for Restore and Protect Greater Grand Canyon with the Sierra Club, said she is extremely concerned and troubled with the Burnt Corral Project because the Forest Service and the stakeholders agreed about five years ago that there would be a no touch or light touch on this project. She said this no longer appears to be the case.

Gitlin said the impact of cutting old growth trees and infringing on Northern Goshawk habitat would change the forest in a disturbing way.

"This area is important to wildlife and it is a botanical wonderland with amazing plants. We need to protect what we have left," she said.

Gitlin has been involved as a stakeholder for five years, but she said the Sierra Club has been involved in protecting this area for decades.

"This sat on the shelf for five years. I was amazed when this showed up in an email in March," she said.

Gitlin said the timing seems rushed and curious in light of the coronavirus that makes it unlikely stakeholders would show up for meetings or fact finding field trips. She said it is particularly disrespectful of the tribes in the area that have a high rate of coronavirus because people would have to pass through tribal land to get to the site.

Gitlin sent a letter to Kaibab National Forest asking them to postpone the review of the project because of the coronavirus.

Requests for extending public comments on federal government projects during the coronavirus is a national issue. Representatives from 60 groups, including Back Country Horsemen, Arizona Mining Reform and Wilderness Society, sent a letter to Chief Forest Service Director Vicky Christiansen asking for the Forest Service to be given a national direction on projects involving public comment because of the coronavirus. They say national direction is needed because some forest service districts are extending comment periods while others are not.

The Attorney Generals from 21 states sent a letter to Acting Director of Management and Budget Russell Vought asking government agencies to extend public comments on projects because of the coronavirus.

Randall Walker, district ranger for the North Kaibab Ranger District for Kaibab National Forest, said the primary ecological objective for the project is restoration of forest structures that support natural functions and resilience to fire. He said the majority of the Kaibab Plateau has an abundance of larger trees unlike much of the Southwest where these trees were removed by railroad logging in the late 1800s.

Walker said the suppression of wildfires in the late 1800s changed natural ecology in the project area, which if left untreated could result in crown-replacing wildfires or degradation in forest health due to overcrowding or insect and disease.

Walker said the suppression of fires prevented natural tree sapling reduction.

"Fast forward to today, the majority of these trees still exist," he said. "That situation coupled with changing climate has created a need for action to restore forest structure in order to improve forest health. The project will restore uneven-aged forest structures. Trees

of all sizes will be felled and removed to restore historical forest structures and prevent future forest loss. This ultimately provides greater protection for and improves resiliency of all the trees that remain as well as all other natural resources in the project area."

According to Trudeau, Kaibab National Forest has the highest density of Northern Goshawk in North America and relies on old growth large trees for habitat. He said the Northern Goshawk is not an Endangered Species but remains an important species. He said a former forest service worker provided a report on the Northern Goshawk in 1990, but that is the only research in this area for the Northern Goshawk.

The 1990 study concluded that cutting old growth trees on the Kaibab would reduce Northern Goshawk reproductive success.

Trudeau said according to the EA there will be no nest site buffers.

"They could be logging right under the nests. This will be a tremendous disturbance," he said.

Walker responded that protocols for managing Northern Goshawk habitat are designed into the project.

These protocols include surveying for occupancy and establishing a nest buffer called the Post-Family Fledgling area with a 30-acre nesting area. These areas would have treatment applied to meet habitat needs and project desired conditions. The project maintains, protects and ensures the sustainability of goshawk habitat.

"Most importantly, treatment provides protection against catastrophic crown fires and increases forest health. Crown fires are the most destructive agent for loss of habitat for both predators and prey. Returning forest structure to a fire-adaptive ecosystem will increase habitat diversity, resulting in a more robust prey assemblage for goshawks in the long term," he said.

Trudeau said the forest service has a history of investing most of its money and resources into logging. He said they are using the guise of cutting young trees, brush and shrubs to cut larger older trees.

Walker said logging is just one of several tools to improve the forest's health and habitat.

"The Burnt Corral project will improve forest health and vigor while enhancing wildlife habitat. The forest will be more resilient in the event of catastrophic crown fire or other changes associated with climate change, such as drought, beetle infestations and tree mortality," he said.

Walker said commercial thinning or logging is just one tool the Forest Service uses to achieve the ultimate goal of improved forest health. He said the use of timber harvesting operations also has the side benefit of supporting local economies, communities and families even though the true goal of the work is forest health and resilience.

Trudeau said the Center for Biological Diversity is trying to provide science and field based work to show that the Burnt Corral project is on the wrong track. He said the forest service is using data from 30-40 years ago when they should be using more updated data.

Gitlin said some of the data isn't only outdated but wrongly marked. She said some of the project's plans call for leaving slash on the ground that could cause more of a fire risk.

Walker responded that the forest service has a large database of exams. All tree data is analyzed in a processor called Forest Vegetation Simulator (FVS). FVS can simulate a wide

range of silvicultural treatments for most major forest tree species, forest types and stand conditions. It simulates forest vegetation change in response to natural succession, disturbances and management. It is a system of highly integrated analytical tools that is based on a body of scientific knowledge.

"Since tree growth in the arid Southwest is very slow, it is common to have data from more than 20 years ago. This data is modeled to predict stand conditions now and into the future. We run models that combine more recent data with older data. The model results are then compared with solid field data. When the Forest Service implements stand treatments, silviculturists take many reconnaissance plots to ground truth the stand exam data and to write prescriptions with the most current information available. Analysis is accomplished with both stand exam data and field reconnaissance," he said.

Walker said as part of the Burnt Corral project, silviculturists spent several months during the summer of 2015 conducting stand reconnaissance.

"Stand reconnaissance involves comparing GIS and remote sensing data to the actual condition on the ground by visiting the stand and walking through it. Notes, photographs, and, sometimes video of 54 stands throughout the project area (about 6,380 acres or 23% of the project area), were gathered, allowing for the confirmation of conditions and proposed actions at the site level," he said.

Trudeau said he sent a letter to the district ranger about a year ago asking for a fact-finding field trip and was denied. He said his concerns have been ignored and if they continue to not be addressed that the Center for Biological Diversity could challenge in court whether the Burnt Corral Project meets the National Environmental Protection Act (NEPA). Trudeau said the stakeholders met about five years ago, but they have not been engaged in this project since that time.

Gitlin said while the forest service took some of her minor points under consideration they also made her major comments feel ignored. However, she said she doesn't know if the Sierra Club would bring the issue to court if they did not like outcome as that decision would not be made by her. She added that the current EA sets the forest service up for problems with NEPA.

Trudeau said now a field trip could not be done because of COVID 19.

Walker said collaborative field visits and stakeholder meetings were held several times in order to inform development of the project's proposed action:

- July 23rd-24th, 2014; Northern Arizona University/Forest Service kick off meeting and field visit (Fredonia, AZ/North Kaibab Ranger District);
- September 18th, 2014 Stakeholder introductory meeting and field visit (Big Springs, North Kaibab Ranger District);
- October 22nd-23rd, 2014 Stakeholder meeting (Kanab, UT);
- November 19th, 2014 Working session on large and old trees (Video teleconference between Flagstaff, AZ and Fredonia, AZ).

Walker said since the development of the proposed action that was scoped with the public and stakeholders in March 2015 that nothing has changed except that more refined Geographical Information Systems (GIS) mapping has neither reduced nor increased the acreages that were originally an estimate.

The Forest Service has also offered two consecutive 30-day comment periods on the preliminary EA (March 26 through April 24; and April 25 through May 26).

Walker said there is still ample opportunity to make comment, address concerns and incorporate changes between the preliminary EA and the final decision.

"We encourage everyone to review the project and provide comments, which will inform the final decision. The Forest Service is planning on having a field trip this summer, after receiving comments on the Preliminary EA. The Forest Service is committed to following the NEPA process and will continue to do so throughout the Burnt Corral project environmental review," he said.

Walker said from June 2014 through January 2015, the Forest Service in coordination with the Landscape Conservation Initiative at Northern Arizona University conducted pre-NEPA collaboration and planning with various interested stakeholders in order to inform development of a proposed action. He said more than 130 participants and stakeholders were invited and responded with additional participants for further outreach. In addition to two workshops, a supplemental working session was convened to focus specifically on the issue of large and old trees at the request of stakeholders.

Walker said about 32 individuals representing 14 organizations including Arizona Game and Fish Department, Center for Biological Diversity, Sierra Club, US Fish and Wildlife Service, Arizona Mule Deer Foundation and USA Conservation participated. Some of the organizations or individuals also participated in the 2009 Kaibab Forest Health Focus or other forest planning processes.

Walker said Burnt Corral is a timely and important land management project to restore a degraded ponderosa pine ecosystem on the North Kaibab Ranger District.

"It will improve forest health and vigor while enhancing wildlife habitat," he said.

Walker said this project will create conditions better able to withstand climate change and other threats such as severe wildfire. He said the forest service encourages people to provide comments because that will inform the final decision.

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