



<http://www.4fri.org/>

April 27, 2017

USFS 4FRI Chief Executive Scott Russell
sarussell@fs.fed.us

Re: 4FRI Stakeholder Group Position on Dwarf Mistletoe Treatments in the Rim Country EIS.

Dear Scott,

On April 5, 2017, members of the U.S. Forest Service (USFS) 4FRI ID Team gave a presentation to the 4FRI Planning Workgroup (PWG) on dwarf mistletoe concerns in the Rim Country EIS planning area. It included a review of the role of dwarf mistletoe in forest ecosystems, an assessment of historical and current mistletoe infection levels, and a proposal for aggressive, targeted treatments (aka “mitigation”) in moderately to severely infected stands (>20% of area infected; up to 265,000 acres of the planning area under current Forest Plan direction). This “mitigation” approach was included in the Proposed Action prepared by the USFS. It was asserted that a failure to implement dwarf mistletoe “mitigation” would be contrary to direction in the Forest Plans.

The PWG evaluated the information presented by USFS and developed this recommendation for consideration by the 4FRI Stakeholder Group (SHG), and with its approval, communication to USFS. The SHG decided unanimously to adopt this recommendation at its April 26, 2017 meeting.

The SHG appreciated the Forest Service’s outreach to the PWG and concurs with the stated goal of maintaining mistletoe as a natural component of restored forests. Dwarf mistletoe is a natural disturbance agent and component of coniferous forests within the planning area. The plant provides food and cover for wildlife; large-tree mortality caused by mistletoe is an important factor in recruiting snags that provide habitat for cavity-nesting birds and other species.

The historical and recent data presented by USFS did not make a compelling case that mistletoe infections within the planning area are significantly outside the natural range of variability and

pose a meaningful obstacle to meeting restoration objectives. The SHG welcomes additional data that USFS can bring to bear on this issue and the opportunity to see first-hand examples on the ground. We are also greatly interested in the larger discussion about using restoration treatments to address forest health concerns related to dwarf mistletoe.

The SHG feels that restoration treatments consisting of mechanical or hand thinning, followed by application of prescribed/managed fire at regular intervals, meet the intent of the Forest Plans and are the preferred approach for stands with high levels of mistletoe infection. Where needed, those stands could also be buffered to reduce mistletoe spread. The SHG also supports testing alternative restoration treatments for affected stands, if done at limited scale and in a learning/adaptive management framework.

The SHG also feels that traditional silvicultural approaches to managing dwarf mistletoe (e.g. overstory removal, even-aged management) are inconsistent with an ecological restoration approach and are not supported by the best available science. These may also be at odds with directions in 4FRI stakeholder foundational documents; the Collaborative Forest Landscape Restoration Program; and, the 2012 USFS Planning Rule. The SHG is particularly concerned that alternatives containing such aggressive treatments will be controversial and likely to impede timely completion of the Rim Country EIS and a Record of Decision.

Sincerely,

Jason Whiting, 4FRI co-chair



Jason Whiting
4FRI Stakeholder Group Co-chair

Travis Bruner, 4FRI co-chair



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4FRI Stakeholder Group Co-chair

CC: Regional Forester Cal Joiner
Apache/Sitgreaves NF Supervisor Steve Best
Tonto NF Supervisor Neil Bosworth
Coconino NF Supervisor Laura Jo West
Kaibab NF Supervisor Heather Provencio