

Four Forest Restoration Initiative

A Collaborative Effort to Restore Forest Ecosystems on Four National Forests in Arizona

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



March 11, 2011

Coconino National Forest

Attn: 4FRI

1824 South Thompson Street

Flagstaff, Arizona 86001

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Dear Forest Supervisors Stewart and Williams:

On behalf of the Four Forest Restoration Initiative Stakeholder Group (“Stakeholder Group”) we welcome the opportunity to provide comments on the Proposed Action (“PA”) and Notice of Intent to Prepare an Environmental Impact Statement for the Coconino and Kaibab national forests, Four Forest Restoration Initiative (4FRI), as released on January 21, 2011 and published in the *Federal Register* at 76 Fed. Reg. 4279 on January 25, 2011, respectively. The Stakeholder Group is excited to be a partner with the Forest Service during such an important and evolving period of forest management. We are encouraged to see the Forest Service conduct its National Environmental Policy Act (“NEPA”) analysis at such a large scale with the goal of re-establishing forest structure, pattern and function to increase forest resiliency. We also realize that as the largest restoration pilot under the Collaborative Forest Landscape Restoration Act what happens in Arizona will have ramifications throughout the National Forest System.

We are dedicated to helping make this a successful landscape-scale restoration project. In 2010, the Stakeholder Group calculated the value of their time and in-kind donation of resources to be approximately \$444,360.00. Working in collaboration with the Forest Ecosystem Restoration Analysis Project (“ForestERA”) the Stakeholder Group provided the Forest Service with its vision of a Landscape Strategy for the Mogollon Rim. We now hope that we can work collaboratively to efficiently complete NEPA requirements and move into implementation of the 4FRI.

The comments included in this letter were reviewed and approved by the Stakeholder Group and represent an official communication of the Stakeholder Group.

1. **Detail.** We are concerned that the current PA does not provide sufficient detail about proposed management actions. According to the PA cover letter of January 21, 2011, stakeholder comments “will be used to refine the proposed action.” The letter goes on to state that revisions will include, “detailed information such as: desired future conditions, what type of activities would occur, as well as where and when those activities would be expected to occur. We will also provide a range of acres by treatment type.” The detail that is identified in the cover letter and promised to be forthcoming is essential in order to provide the public with a meaningful understanding of the actions that are being proposed and to conduct a

robust effects analysis. Although we understand that the PA is currently evolving and being refined—a new and valuable approach to NEPA—we feel it is important to be clear on your timeline of when the final, refined PA will be finished.

2. **Strategic Placement of Treatments.** We are pleased that the Forest Service intends to strategically place treatments to maximize the ability to reduce fire risk. Yet it is unclear what method will be used to identify and configure strategic treatments. The Stakeholder Group has proposed configuration by FireScape. Other methodologies exist to determine treatment configuration as well. More clarity is needed. In addition, we request more clarity with regard to how the strategic placement of treatments will interface with planned and unplanned ignitions.
3. **Old Growth.** The Stakeholder Group has clearly stated that no old-growth trees¹ (predating Euro-American settlement or currently exhibiting old growth structural characteristics) should be cut. Presently, the language in the PA states that treatments will be designed to manage for old trees. This does not provide sufficient assurance that old growth will be protected.
4. **Managing With Fire.** The PA is silent with regard to how unplanned ignitions will be used as a management tool. Safely restoring low-intensity fire to the landscape is a goal of the 4FRI. Greater detail is needed regarding how the Forest Service will manage planned and unplanned ignitions. See number 2 above.
5. **Ecological Restoration.** The Stakeholder Group believes ecological restoration should guide, and be the goal of the 4FRI. The project summary states that the goal of the project is to re-establish forest structure, pattern and function, which will lead to increased forest resiliency. It then suggests actions that are traditional silvicultural treatments without specifying how they will use ecological science to frame action and achieve desired ecological conditions. It does not explicitly tie the goal of the 4FRI to historic conditions, natural range of variability, or clarify how forest resiliency and function will be accomplished at the landscape scale. The Forest Service Handbook FSM 2000/Chapter 2020/Effective date 09/22/2008 provides foundational policy for using ecological restoration to manage National Forest System lands in a sustainable manner. Using the definition of ecological restoration² from the Handbook would make the goal of this project crystal clear and tie it to the legal framework that supports it.
6. **Economics and Utilization.** The PA is silent on the relationship of the 4FRI to economics and utilization. The Stakeholder Group believes that ecological restoration and economic

¹ Kaufmann, M. R., D. Binkley, P. Z. Fulé, M. Johnson, S. L. Stephens, and T. W. Swetnam. 2007. Defining old growth for fire-adapted forests of the western United States. *Ecology and Society* 12(2): 15. [online] URL: <http://www.ecologyandsociety.org/vol12/iss2/art15/ABSTRACT>. There are varying definitions of old-growth forests because of differences in environment

² Ecological restoration. The process of assisting the recovery of resilience and adaptive capacity of ecosystems that have been degraded, damaged, or destroyed. Restoration focuses on establishing the composition, structure, pattern and ecological processes necessary to make terrestrial and aquatic ecosystems sustainable, resilient, and healthy under current and future conditions.

utilization must be mutually supporting and that landscape-scale restoration cannot be accomplished without private sector harvest, utilization, and marketing. It is a fundamental vision of the 4FRI that landscape-scale restoration should support sustainable forest industries and vibrant rural communities. The stakeholders would like to see a commitment to this goal.

7. **Monitoring.** In order to develop a robust monitoring framework additional detail about the ranges of measurable forest variables for the various Desired Future Conditions will be necessary if the monitoring program is to have sufficient power to assess whether or not management objectives are being met.

We want to reiterate our commitment to developing an implementable monitoring program that measures not only ecological response to treatment but also the social and economic outcomes of the 4FRI. We recognize that resources will be a limiting factor, but believe that multi-party monitoring is critical to achieving the goals of 4FRI.

In addition to the need for a targeted and efficient monitoring program, we also would like to emphasize the tremendous opportunity provided by the 4FRI to increase our understanding of the ecology of these systems. Given the 4FRI's commitment to being a science-based endeavor we would ask that the Forest Service help cultivate an atmosphere that is conducive to research being conducted by a variety of partners.

8. **Adaptive Management.** We are encouraged by the Forest Service's commitment to use adaptive management, and we feel some of the critical components of adaptive management should be highlighted. Adaptive management requires explicit statement of goals and objectives, and a well-informed monitoring program that has the requisite power to detect management impacts rapidly enough to inform future management. Furthermore, adaptive management is a structured decision- making process that relies on clearly articulated triggers for management change. Finally, adaptive management requires a commitment to change management when monitoring data indicates that the thresholds identified by those triggers have been crossed.

We look forward to continuing to collaboratively develop this program with the Forest Service in the coming months.

Sincerely

A handwritten signature in black ink, appearing to read 'Ethan Aumack', with a long horizontal flourish extending to the right.

Ethan Aumack
Co-Chair