



September 2, 2011

Coconino National Forest

Attn: 4FRI

1824 South Thompson Street

Flagstaff, Arizona 86001

[http://www.fs.fed.us/nepa/nepa\\_project\\_exp.php?project=34857](http://www.fs.fed.us/nepa/nepa_project_exp.php?project=34857)

Submitted by email to [pcote@fs.fed.us](mailto:pcote@fs.fed.us)

Dear Forest Supervisors Stewart and Williams:

On behalf of the Four Forest Restoration Initiative Stakeholder Group (“Stakeholder Group” abbreviated as “SG”) we appreciate the opportunity to comment on the Revised Proposed Action (“RPA”) as released on August 17, 2011. The SG submitted comments on the First Proposed Action on March 11<sup>th</sup>. One of the issues that concerned the SG was the need for significantly more detail. We value the novel approach the Forest Service has taken during scoping to do both a preliminary and revised Proposed Action. It has enabled a continuing dialogue that translates to greater efficiencies during the EIS analysis.

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

1. **Strategic Placement of Treatments.** The SG understands that a prioritization process was used by the ID Team to identify portions of the landscape with “High” and “Moderate” Ecological Restoration need. We appreciate that this prioritization method integrated stakeholder values and earlier analyses (Landscape Strategy and Small Diameter Wood Supply), as noted in Appendix D of the RPA.

We understand that the sequencing decisions will be planned as part of the implementation process and look forward to working with the Forest Service to collaboratively identify optimal sequencing approaches.

However, we want to reinforce our position that how treatments are sequenced will have an impact on protecting values at risk from unnatural crown fire, in addition to how effectively and efficiently we can rapidly change fire behavior (the strategic sequencing of treatments). We believe that by strategically sequencing treatments (in time and place) the 4FRI will be able to align ecological and economic goals consistent with the vision articulated in the SG foundation documents, including the Landscape Strategy. We recommend that the implementation process be informed by planning that guides unit selection and sequencing temporally and spatially.

2. **Old Growth**. We appreciate the commitment made by the Forest Service to avoid cutting old trees. We feel the language in the RPA does not adequately reinforce that intent. We recommend that the wording in the RPA is modified in the DEIS to state:

"Old trees would not be targeted for removal (cutting) except in rare circumstances.

However, exceptions may be necessary. An example of this would be to cut an old tree in order to accommodate the turning radius of a logging truck, rather than relocating an entire road. Another exception would be removing an old tree to address human health and safety concerns."

3. **Planned and Unplanned ignitions**. We appreciate the emphasis the RPA places on fire as a management tool. We look forward to studying the effects analysis on this topic. We also recognize that managing unplanned ignitions is a decision made by a line officer and not possible to analyze in the effects analysis. We are encouraged that the Forest Service is presently managing several unplanned ignitions for resource benefits and hope that by implementing 4FRI treatments unplanned ignitions can play an even more significant role in forest management in the future.
4. **Ecological Restoration**. The SG acknowledges that the RPA expanded the desired condition descriptions to include restoration goals. At broad scales, we appreciate that desired conditions in the RPA are in agreement with collaborative desired conditions as spelled out in the Landscape Strategy and Path Forward. Desired conditions are still needed at finer scales. We ask that collaboration to develop desired conditions consistent with the SG landscape strategy and other foundation documents continue through the NEPA analysis process. At a minimum we recommend the continued use of 4FRI collaborative products as an evaluation/ check point for desired conditions. These include the following documents: Path Forward, Landscape Strategy, Economics and Utilization, Large Tree Retention Strategy and the MOU.
5. **Monitoring and Adaptive Management**. The SG appreciates the commitment made by the Forest Service in the Scoping Report to working with the SG to develop a monitoring and adaptive management plan. We look forward to working with you on that plan. In addition to ecological effects of landscape scale restoration, recognition, preparation and tracking of both the social and economic impacts of the 4FRI project is paramount to the project's success. Social awareness, knowledge and support coupled with economic viability, such as

a prepared workforce, adequate infrastructure, and reliable wood supplies, are critical factors that will be primary drivers of the project's progression.

As requested by the first SG response letter, the RFP provides more detail with respect to post-treatment forest structural conditions. These are critical to predicting the effects of the treatments proposed by 4FRI and assessing if prescriptions and implementation are consistent with the Desired Conditions. The ranges described are a significant step towards ensuring that the monitoring program has sufficient power to assess post-treatment conditions.

Using the desired conditions developed for the SG landscape strategy, the SG has identified a series of indicators and metrics that can be used to describe the anticipated effects of treatments. These anticipated effects can serve as a starting point for developing the necessary thresholds and benchmarks for adaptive management. We recommend that the DEIS outline an adaptive management approach that describes the decision framework and its relation to multiparty and all monitoring (biophysical, social, economic). Furthermore, it is likely that an implementation guide will be necessary to provide sufficient detail for adaptive management to occur.

By actively pursuing both management and research questions through rigorous monitoring and facilitation of designed experiments, respectively, the 4FRI can ensure that it is using and improving the best available science. Both the Arizona Game and Fish Department and the Salt River Project are developing experimental designs that can be implemented as part of the first 4FRI project and serve as examples of how research can be implemented within 4FRI. We recommend that the USFS incorporate latitude for research in the preferred alternative that allows for these designs, including experimental control (i.e., untreated) areas that enable researchers to make meaningful comparison of treatment results and encourage additional researchers to build on the design frameworks developed in the aforementioned examples.

6. **The Large Tree Retention Strategy (LTRS).** The SG understands that the Forest Service included a modified version of the SG LTRS in the Appendix in order to allow the general public to provide comment. We emphasize that the history and past work of the collaborative to develop these strategies, in response to a request from Forest Service partners, add value and are integral to Forest Service planning efforts for the first analysis area. The SG recognizes and appreciates the utilization of the Old Growth Protection Strategy and reference to the LTRS in the refined PA. However we are disappointed that the LTRS was not included as an integral part of the PA. We recommend the USFS use the full and complete LTRS in combination with other collaboratively approved documents as the basis of the actions and strategies conveyed by the stakeholder group to the USFS to be analyzed in the EIS.

Finally, there are some outstanding management issues that have not been discussed with full collaborative participation and/or with Forest Service staff. These issues will be raised by

individual stakeholder's comments. We expect that some or all of these issues may be considered at the discretion of the stakeholder group in the future and we invite the USFS to request collaborative help in addressing other relevant issues and concerns. When that occurs we anticipate the discussion to be a collaborative process that engages the Forest Service.

We look forward to collaborating with the Forest Service as we progress through NEPA.

Sincerely,



Edward Smith

4FRI Stakeholder Group Co-Chairs

/s/Ethan Aumack

Ethan Aumack