



Coconino National Forest
Attn: 4FRI
1824 South Thompson Street
Flagstaff, Arizona 86001

March 11, 2011

Mike Williams
Supervisor, Kaibab National Forest
Earl Stewart
Supervisor, Coconino National Forest

RE: Four Forest Restoration Initiative, 1st Phase Proposed Action

Dear Mike and Earl:

Thank you for the opportunity to provide comments on the proposal to conduct restoration activities on ponderosa pine ecosystems within a 750,000-acre portion of the Coconino and Kaibab National Forests as part of the Four Forest Restoration Initiative (4FRI) (Letter of January 21, 2011, File Code: 1950). We applaud the Forest Service (FS) for this bold initiative and for willingness to work collaboratively on the planning of such a large and innovative project.

As you are aware, the Greater Flagstaff Forests Partnership (GFFP) has been working on forest restoration and community protection activities throughout the Greater Flagstaff landscape for more than 12 years. As such, several Partners from GFFP have been heavily engaged in the 4FRI since the inception of this historic landscape scale restoration project. Working directly with the FS 4FRI Team and, as members of the 4FRI Stakeholder Group, the GFFP has been greatly encouraged by the efficiency and depth of your approach to this dynamic effort. As members of the 4FRI, we have reviewed the letter that will be submitted on behalf of the Stakeholders to the FS regarding this Proposed Action (PA) and agree and concur with the comments provided in that letter under the eight headings of: 1) Detail; 2) Strategic Placement of Treatments; 3) Old Growth; 4) Managing with Fire; 5) Ecological Restoration; 6) Economics and Utilization; 7) Monitoring; and 8) Adaptive Management. We therefore reinforce those comments with this letter.

We also provide the following comments directly from the GFFP Board of Directors:

- 1) Based on the section of the PA (page 3) and on the FS 4FRI Team presentations made at the recent Public Workshops regarding treatment options or approaches for the PA, we are concerned regarding the limited number of treatment types as presented. We hope that there will be a variety of treatments that actually could be implemented within any one of the treatment options identified. GFFP looks forward to working with you to develop the treatment scenarios into more specific treatment options based upon site specific resource considerations.



We want to ensure that the PA results in a diversity of thinning and fire treatments that provide the full natural range of variability of forest structure, composition and function necessary to meet all resource objectives and that will support natural fire regimes across the landscape.

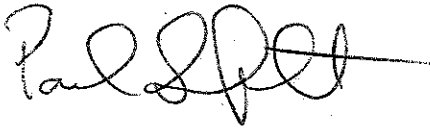
- 2) We are encouraged by your discussion of “strategic placement of treatments would maximize the ability to reduce fire risk” in the PA section (page 3, paragraph 3). The GFFP believes that the Lake Mary Watershed (LMW) is a priority treatment area (municipal water supply source prioritized in the local CWPP). In utilizing a strategic placement of treatments approach, we recommend the LMW is prioritized as one of the first treatment implementation areas. GFFP would like to work with the FS, City of Flagstaff (a GFFP Partner) and other stakeholders to designate the LMW as a priority area and assist in designing a treatment approach and an aggressive timeline that reduces the potential negative effects of a severe fire on this critical watershed that so many citizens cherish and rely on.
- 3) As stated above relating to the 4FRI Stakeholder Group comment letter, the GFFP is concerned about a lack of specificity in the PA and during Public Workshop presentations about where, when and what type of treatment action will take place. Related issues are: determining where treatments, especially silvicultural and fire-based, fit into a trajectory of achieving restoration objectives outlined in the Desired Future Conditions (DFCs); how stakeholder “filters” (such as Candidate Areas or the Old Growth Protection and Large Tree Retention Strategy) may affect treatment placement and intensity; and how various other “filters” are applied and prioritized to potentially modify and refine proposed treatments at the project level. To that end, GFFP commits to working with the FS to develop a Landscape Restoration Matrix that can be incorporated into the final PA; one that could be used at the Treatment Area, Firescape or full Analysis Area level.
- 4) The GFFP worked with the FS and 4FRI Stakeholders in development and submission of the Collaborative Forest Landscape Restoration Program (CFLRP) proposal, which was ranked first nationwide and funded with \$2M. We were surprised the CFLRP was not mentioned in the PA, as well as how the two projects fit together.
- 5) Lastly, we look towards implementing an effective adaptive management program. To this end, an essential component is an efficient, cost effective monitoring program that will directly inform management decisions. GFFP is committed to this process and will strive to work with the FS to provide a systematic and pragmatic approach that will ultimately improve project planning, reduce conflict and increase trust. It is our expectation that both the 4FRI Stakeholders and the FS commits the resources to this process. Without adaptive management in the forefront, the potential success of the 4FRI project will be compromised.



Finally, we commend the FS on your efforts to date, and on your approach to such an ambitious project traveling an uncharted course. Your work to date has been excellent and we appreciate the collaborative engagement provided!

We look forward to working with you on this PA throughout the NEPA process as appropriate to collaboratively develop an effective and socially acceptable landscape restoration plan and project. Then hopefully the hard work begins – implementation!

With Warm Regards,



Paul Summerfelt
President, GFFP Board of Directors

Enclosure: Landscape Restoration Matrix

cc: GFFP Board of Directors & Partnership Advisory Board
Henry Provincio & Paula Cote, 4FRI Team, USFS
Ethan Aumack & Steve Gatewood, Co-Chairs, 4FRI Steering Committee