

Meeting attendees:

Steering Committee Report

Hiring

The Stakeholder Collaborative (Collaborative) decided to discontinue working with the selected facilitator, Mike Hughes, before they completed Phase I. They will try to finish up the tasks of completing the Path Forward, the Charter, and the MOU with support from the U.S. Institute. The SC are in the process of lining out a scope of work for Phase II and will work with the U.S. Institute to identify, interview, and hire a new facilitator by end of April. However, the funding from the USFS for facilitation support will run out at some point, so the Collaborative needs to think about how and when they can proceed without facilitation.

Participation expectations

The work groups that have been formed are trying to develop products on an ambitious timeline. The Collaborative needs commitment from people on the work groups to participate on a continued basis so they don't hold up the rest of the group by coming back at a later date and taking time to catch up. The Collaborative requests that if a working group member is not able to continually participate, they find a way to convey their input in a timely manner and not hold up the group's progress.

Communications

The Collaborative has wanted to get the Basecamp website set up, but they haven't found the time. Now they have lined up John Graham to help. The intent is to get the website up and running soon.

The steering committee meets once a week: Tuesday at 2:00. There is an open invitation to those who want to attend. The steering committee is working on additional information for the Charter on how the steering committee is formed and the rotation of the committee coordinator, etc. Right now there is a coordinator position that rotates on every 3 months. Ethan Aumack is currently the coordinator, but Ed Smith will become the coordinator at the next meeting, so he will be reporting out for the Collaborative.

USFS Hiring

The Forest Service representative will be discussing the FLRA proposal later today, so that report will come later.

The Forest Service has hired some new 4FRI team members. The new Team Lead, Henry Provencio, has just started work. The USFS is in the process of hiring a fire ecologist. They are also working on hiring a NEPA specialist in the near future. The full team will consist of a Team Lead, Asst Team Lead, Silviculturalist, Wildlife Biologist, NEPA Specialist, and Fire Ecologist.

There is also a new Forest Supervisor on the Coconino NF— Earl Stewart, and a new Deputy Forest Supervisor on the Apache-Sitgreaves, Jim Zorns.

Decision Rules

Report

The need for consensus has been problematic for the group over time. In the last steering committee meeting, the committee developed decision rules to help them move beyond stalemate. The committee decided to use the simple term “agreement” and developed an agreement matrix to guide decision-making. The decision matrix they developed will be rolled into the Charter. It contains three levels of agreement: Agreement without Reservation, Agreement with Reservations, and Agreement by Acquiescence, as well as the one level of disagreement: No Clear Agreement. The decision matrix was reviewed and discussed by the participants.

Agreement

On review, the group agreed to incorporate the following suggested change to the wording on Agreement by Acquiescence. “Those who agree, and those who disagree must express their reasons and have them recorded.” The group reached agreement without reservation on adopting the decision rules.

There was some discussion about who will be able to weigh in on decisions, for example, whether just one person from each organization will be able to participate, or whether all participants can weigh in on decisions. That decision is still to be addressed in the Charter. It will depend on what the final structure looks like.

For today, everyone agreed to just poll all participants weighing in on decisions. Since it is not a majority rules process, it really doesn’t matter that much. However, the point was made that there should be some effort within organizations to resolve differences.

Path Forward

Report

The Path Forward document was begun last May and is an important document to define the vision and direction for the group. The drafting committee completed the document on March 12th, including the decision rules. The document had sufficient agreement to move forward, with 2 caveats. 1) GFFP needed to take the Path Forward back to their Board and 2) ERI/Wally Covington asked to confer with his staff.

In the future, documents will be sent out in advance of the 4FRI meeting with the hope that agencies can vet these documents within their organizations, so they can come to the meeting prepared to make a decision. The group can consider it a great vote of confidence if both the NRWG and Board come back with an endorsement. The decision will be discussed at the next 4FRI meeting and the final decision will be made. In the meantime, the group will continue with review /editing of the most recent version.

Still being discussed is how the Path Forward is used, referenced and addressed in other documents, such as the MOU, and the Charter.

Review

The Path Forward was projected on an overhead screen and the changes that had been made in late November through February were reviewed with the group.

Section I and II = No major changes.

Section III = added ecological goal #6: “Retain sufficient trees of all size and age classes to assure development of natural stand dynamics.” and modified #10: No old growth trees (predating Euro-American settlement or currently exhibiting old growth structural characteristics) shall be cut.”

Section IV – no changes.

Section V– added under Sideboards for Accelerated Restoration. Many sentences in the first paragraph were changed, starting with sentence, “These sideboards are meant to be an initial reflection of social agreement, and an opportunity for continued analysis, refinement, and translation through subsequent planning and design efforts.” The word *consensus* was changed to agreement throughout the document. There were no changes to sideboards 1 and 2. CWPPs were added under #3. No other changes to sideboards 3 – 7. Sideboards 8 and 9 – split out old growth and large trees to distinguish the different management objectives. Sideboard 9 was changed to eliminate the strict diameter cap. Exceptions to 16” diameter cap are outlined. Public safety goals were added. Also, the use of best available science with stakeholder discussion was explicitly identified as the basis of decisions. The goal of achieving structural heterogeneity was included.

The idea is that diameter cap would be a limiting factor under all conditions, but would not be mandated. This affords flexibility of the group to discuss the 16” threshold. It places the burden of proof on why that cap limit would be exceeded.

Comments and Discussion

Comment: Sideboard # 5 should have some definition of desired future conditions (DFC) – not just sideboards on decisions. Ask the USFS if this is what they need to build into the NEPA process and how they would like the group involved.

Response: The purpose of the document is not to comply with the NEPA process. The purpose is to crystallize the agreement of the Collaborative as to how they proceed and how this process can move forward. The relationship between this document and the NEPA process is that it provides a process aid in how the Collaborative can be involved in the development of DFC.

Comment: Reminder that these documents are public documents, so they should not reflect the wrong idea. A suggestion was made to possibly change the word *sideboard* because it seems to have a negative connotation. Proposed ideas: DFC or guidelines.

Response: The word *sideboard* has some real value to the group because their purpose is to keep people on track. The sideboards are there to help the group navigate where we are going. A word like *guideposts* might be a more effective term when working with the public or the media. The word *sideboard* has been discussed extensively by the steering committee because they are also aware of possible misinterpretations. However, for the time being, it seemed to best connote the reality of the process.

Comment on #9: if the group is going to identify specific documents to reference, then CWPPs should be included because they are publically vetted documents. If CWPPs are not included, then don’t identify any documents at all.

Response: CWPPs were not included because there was such a wide array of documents and loosely defined WUI areas.

Considerations and Reservations

There was further discussion and proposals for changing the wording on sideboard #9 to address the concern with CWPPs. Reservations on wording in #9 in the Path Forward included:

Concern that CWPPs need to be considered in decision-making along with other documents and/or information. Suggestions to that end included identifying CWPPs to be certain they are considered with other information in the decision process. The group needs to address areas that communities have identified.

Concern with the boundaries that were identified in many of the CWPPs. Specifically, concerns with the breadth of the boundary areas identified because there was no clear guidance in their development. The original intention in drawing the boundaries was for a wood biomass utilization study, and they do not necessarily reflect accurate areas of high risk in need of WUI treatment prescriptions.

Concern that the distinction be maintained between the goal of public safety and risk reduction versus true restoration. Suggestion was to keep wording in #1 and #2 separate to maintain the intent of the two areas separate.

Concern that the point needed to be made that the treatments will be compatible with the CWPP goals. Suggestion was that wording be included to require the group to use the CWPPs to establish priority areas of treatments. Those designing treatments will make a distinction in the prescription for restoration within areas established as risk reduction areas.

Reservations: the Path Forward is written as guidance – but these are natural systems, so there are always exceptions to bounds or guides – always goes outside the bounds, so this is fairly rigid way of addressing a natural system.

CBD does not agree with all the compromise language, but they will support moving forward with the collaborative.

GFFP – voted on Path Forward, and had general support. They also have some reservations, but will support moving forward.

NRWG – will support or not based on vote in next meeting , but in either case, they will not adopt these sideboards into their protocols.

TNC – same concern with compromises. Some of the TNC members agree and some don't. Some concern with guidelines, but they will be addressed at the ground level.

Agreement

The final change the group deliberated and agreed upon was to add the following wording under sidebar #9: "... and where stakeholder agreement identifies priority areas within approved CWPPs"

The full group reached agreement with reservation/acquiescence on the entire Path Forward document, with the changes to wording in #9 noted above. The reservations are noted above. Groups who want to submit written reservations can send them to Ethan Aumack. [Written reservations are attached at the end of this document]

Without Reservation– 9

Reservations = 13

Acquiescence = 1

The NRWG will be looking at the document in their April meeting to discuss and determine if they will support. The Monitoring Board will meet the same day as the NRWG, so they will make a combined decision. However, the whole group agreed not to wait until the next meeting to decide on adopting the Path Forward, except to record NRWG's and WMSC Monitoring Board's reaction.

Report

The steering group has been discussing the proper structure for the collaborative, which led to the question of who would sign the document. There was discussion about whether the group needs to become an LLC or a 501.c3. The decision was determined that the structure would depend on how the group defines who they want to be. The range of discussion was from the height of formality/organization to very loosely organized. Reaching agreement will require a broader discussion.

Review

The Charter was displayed on the projector and discussed.

Vision: A change was made to include a reference to natural fire regimes and forest ecosystems. (Once these changes are finalized, someone will need to make the vision and mission statements consistent across documents.)

Mission

The mission is the same as in the Path Forward and Statewide Strategy.

Actions

The committee made a few changes to put a finer point on what the collaborative intends to do.

A clarification was made that the stakeholder collaborative is trying to define for the USFS what they want to work on with the USFS. The steering committee will meet on April 2 to work on the document. The group is conscious of the need to make the comments here compatible with the Path Forward document.

Decision Rules and Deliberation

The committee discussed that the whole body is the decision-making body for the organization. They still need to flesh out how somebody becomes a stakeholder – ie. One vote/one organization versus all stakeholders. The committee noted that their role is to facilitate the working of the larger group, not make all the decisions.

Stakeholder Group and Individual Responsibilities

Changes were made to distinguish between group commitments and individual commitments and to further flesh them out.

Role of Facilitation and Ground Rules

This is where the conversation stopped. Currently, the committee is working on getting another facilitator, but the funding for that will run out at some point.

The original list of ground rules were not sufficient – so the group will go back to review. The group asked for additional examples from other ground rules. They should be aspirational. Stakeholders probably can't live up to the level of all these rules in every way.

Communication

This section has not yet been addressed by the group. They still need to discuss who speaks for the group and who crafts what is to be said.

Participation and Representation Guidelines

These guidelines will be determined by who the group wants to be as an entity, so there is no need to go there yet. Good examples of guidelines were solicited.

Funding

Decisions about funding will depend on the final structure of the group, so no need to discuss just yet.

Contracting Schedule

The schedule still needs to be discussed.

Principles

The decision has not been made as to whether they will be left in or out. The answer depends on the final structure. The Path Forward is not actually part of the Charter. It is referenced only.

The question arose as to how people sign onto this Charter. The steering committee will figure out how people can join the collaborative. It was agreed that new members must agree to the Path Forward to become part of the collaborative

Memorandum of Agreement

Report

The steering committee members are pretty much in agreement on larger portions of the document, but they do not have a finished document to bring to the group now. Specifically, they can't come to agreement on the commitments – both on the side of the USFS and on the side as the collaborative. The steering committee has agreed to come to the next 4FRI meeting with a list of their expectations for themselves and for the USFS.

Specifically, they want to identify:

- the collaborative's needs
- what the collaborative has to offer the USFS
- their needs from the USFS relative to their capacity to commit to this collaborative

Example –there is a general commitment that the USFS will participate. However, the collaborative wants a clearer indication of how they will participate. The collaborative wants more commitment in 3 areas.

- 1) Process – invitation to become engaged throughout NEPA – before, during, after
 - a. What authorities would you need in place to work outside the traditional bounds of NEPA?
- 2) Outcomes/products
 - a. Need a commitment to the timeline and outputs so there is some guarantee for the collaborative
- 3) Collaborative
 - a. Action items the USFS will bring to the table to make the collaborative work
 - b. Look at stewardship agreements or similar mechanisms

The group expressed their appreciation for the commitments the USFS has made so far:

- Pulled together an Implementation team
- Provided funding for facilitation
- Attended all meetings and participated actively

However, the committee sees the need for the USFS to be more deeply involved with the collaborative and vice-versa, so their development is more parallel and compatible. The two groups are moving in parallel tracks toward some point of convergence, but they haven't converged yet.

Discussion

The question was posed as to who the ultimate decision-maker is for the process: the Forest Supervisors of the 4 forests or the Region 3 Regional Forester? The 4 Forest Supervisors will be the decision-makers for the effort. But they have a responsibility to report to their Regional Forester on the project.

In response to the request for greater commitment, USFS representatives noted that the MOU that is currently under review was crafted with a lot of input from the Regional Office and their OGC, so it is very general. The Forest Supervisors would be happy to have the conversation on how to make this more detailed and provide more commitment.

The question was raised about how the collaborative might be able to help the Forest Supervisors engage the WO or RO more. The Supervisors responded that they are taking a more active role, and working out leadership / decision-making expectations with the Regional Office. They acknowledged that the goals of the collaborative and the USFS are the same. They reiterated that the USFS is not going to do anything outside the regulations, but they are committed to getting the agreement worked out.

Ethan, speaking for the collaborative, noted that the collaborative has not been as clear as they could have been about what they need and what they offer. The committee has agreed to do some things differently – specifically to be clearer and more ambitious about what they need and what they offer and how the groups can work together. It will take additional time to generate products that clarify those needs, but they are committed to producing a list of deliverables they can be accountable to/for. The group has been working at cross-purposes – and they recognize that it is hard for the USFS to work with them, so they are looking for a unified perspective in a very timely way so they can take a large step forward.

A USFS representative noted that the Forest Supervisors are comfortable in taking some risks, but they are skirting the edge of FACA with this group. It is appropriate that the group is bumping into these issues, but it is a problem because of what all are trying to accomplish. The USFS cannot put into the MOU what the collaborative wants unless there is more direction of how to operate between full collaboration and NEPA.

The collaborative is willing to help work out the details on how they can work together in a way that pushes the limits. From the collaborative's side, they need to still go out and look at other efforts to see how far they were able to push the limits and how they accomplished it. They are very interested in being involved in helping to "rewriting the playbook" so the USFS has more leeway in working with collaborative groups.

In the past, there has been talk about all the ways the USFS and the collaborative were going to have to do business together. All that has gone to the wayside in the short term, and the 4FRI group needs to go back that direction. The collaborative is strongly supportive of trying to move into areas that are grey. They are wanting to have more discussion and more risk-taking around the issue of how they can push the limits.

The next step on the MOU is that the steering committee will circulate drafts and continue their discussion, including taking comments. They will convene again at a meeting on the MOU on April 29th. They are asking to move the next 4FRI meeting to May 5th. Courtney will work with the Steering Committee on this issue, but it is an open forum and others who are interested are welcome to join. Review draft available on April 30th and circulated for review in May 5th meeting. Final signatures will be determined as the MOU is finalized.

WORKING GROUP REPORTS

Landscape Working Group Report

Report

The Forest Supervisors have been at the LWG meetings. The group has made progress and has good direction and timeline. However, Henry (new Team Lead) has not been involved, so they are not ready to make final decisions until he has had time to get up to speed.

Come up with some general anticipated outcomes:

- Currently updating veg structure and composition layers for the whole 4FRI area
- Discussing how they can subdivide the landscape in more reasonable pieces
- Developing criteria and rationale for strategically placing treatments across the landscape
- In terms of overall processes – defining category and purpose of treatment types - further refine distribution curves for wood study. Trying to better ensure heterogeneity across the landscape.
- Discussing landscape scale questions so we are not leaving out any big issues
- Not trying to redefine current DFC – but use that information with modeling information to better describe what the range of treatments would need to look like across the landscape to make sure they can accomplish range of objectives across the landscape.
- Identifying the priorities areas by building on past processes.
- Overall, the group is trying to take all the other products that have been build and information and synthesize it to move the process forward quickly and strategically.

Next Steps

The group will slow progress down a bit to give Henry a chance to get up to date. Then they will look at timelines to make certain things are getting done in a timely manner. They will develop a work plan to put the whole package together.

The key will be making sure both groups are moving along at similar timelines. Keeping progress coordinated continues to be a challenge. There will be more documents to bring to the next meeting. Shaula will send the progress report out to all the folks.

One of the main challenges is to keep everyone updated on the progress of each group. The group has put together a progress report, which has proven really helpful to document where they have been and where they are going.

There is a question of how to link process of landscape level focus with what is happening on the ground. The group is working on trying to link at both scales. They are currently developing ecological subunits in which they can do more intensive modeling – somewhere on the scale of from 70- 250,000 acres.

Linking these two scales is important in terms of articulating how and why you strategically place treatments across the landscape. They are trying to very clearly identify ecological criteria for subdividing the landscape. Clearly define criteria and rationale and use across the landscape.

They are trying to define DFC, but also a range of variability to address multiple issues across the landscape – ie. Habitat. They still need operational level people to beta test these ideas. They fully intend to have people involved with the whole process.

The primary product coming out of this strategy is the criteria for how we strategically place treatments. The group needs to coordinate their effort because of the timely manner in which the strategy is moving forward. There needs to be good interaction between the working group and the USFS.

The group expects to have an updated vegetation base layer by early June. This is an important timeline because this is where the group will get real traction. Everyone needs to work together and make this useful to the USFS. This product will be different from other assessments done by other stakeholders. This will be a formal document from the USFS that has been developed collaboratively with this group. It will be different from other Forest/ERA processes.

The 4FRI team will be dedicated to this effort from this point forward, so everybody wants to work together.

FLRA Working Group Report

Report

Timeline for FLRA proposal:

- Submit proposal to the RO – April 16th
- Due to WO – May 14th
- Proposals will be reviewed this summer by the FACA committee convened by the Sec of Ag.

There are several required sections for the FLRA proposal –

- Proposed treatment
- Ecological context
- Collaboration
- Wildfire
- Utilization
- Investments
- Funding Estimates
- Funding Plan
- Maps
- Landscape strategy

The working group has the full draft of the FLRA proposal completed. They will get together and finalize.

On Mar 29th, they will send the draft to RO - with further review by working group. The week of April 12th the working group will send a draft of the landscape strategy to RO – with review by the working group.

The FACA committee notice came out in February. The word is that the WO has only received 6 applications so far, and most, if not all of them, have come from R3.

Communications Working Groups

Media is already crafting an image for the group (Bonnie passed out news release to illustrate the point). Jackie and Brady put together a lot of Key messages from the USFS. They have used a lot of language that is factual that should not present that much of a problem to the rest of the working group. The messages can be used by the group to develop media talking points.

There are multiple opportunities for public presentations. There is a National Forest Foundation conference in Missoula/May on place-based initiatives. Courtney/Ethan will give presentation on the 4FRI. Courtney will also be presenting at Society of American Foresters/October. The presentation is hosted on the Kaibab NF's home page. Courtney will post all the stakeholder meetings and working group meetings.

Note to all that when there are calls from the media, include Henry as the Team Lead with stakeholders.

ERI will put together some communication workshops in the fall. There will be a series of three workshops. Contact Bonnie with questions. Also contact Bonnie to put an announcement in the media.

The group has plans to put together a website. They are not ready to go forward with a website yet. The Kaibab has been taking that lead so far.

A suggestion was made to have a place for public comments at the beginning of every meeting. The proposal was to have this public comment period at the front end of the meeting so people don't have to leave all day. The steering committee decided to take it up in the Charter to decide how to incorporate public input. They will discuss whether it is in the spirit of 4FRI to have the public just comment at the front of the meeting, or encourage them to stay and participate in the meeting.

Industry Working Group

The group has not met for a while and don't have anything to present. They are kind of on hold for how.

Science WG

The science working group has met twice and had good participation so far. They are still very much in a formative stage. Two major tasks right now:

- 1) Short-term = reviewing the monitoring section of the FLRA proposal
 - a. Provided input on where monitoring is mentioned and use of best available science.
- 2) Longer-term = developing and refining the purpose and responsibilities. Largely focused on what monitoring is in the context of 4FRI – provide monitoring service to other groups and to other stakeholders who are pursuing research – as well as to the collaborative group in general.

The group is trying to figure out how science works in other groups, so they are looking at other groups. They have had a lot of interaction with the landscape working group, and they are in the process of defining areas of divergence.

General

Chris Knapp announced that he and the other Forest Supervisors were planning a trip back to the WO to brief internal staff. They have lined up meetings with most of the WO directors in the critical functional areas. The meetings will take place on May 3rd. Chris invited others from the group who are interested to go back to DC with them. People expressed their appreciation to Chris for the invitation.

There will be future discussions on a policy committee to explore some of the questions about "rewriting the playbook." The group will start thinking about what that would look like. For now, the group will move that question into the Steering Committee. A good place to start is by building examples and networks through presentations.

NEXT MEETING
May 5th in Flagstaff

Agenda

Revisit Charter – final approval

MOU – revisit final draft

FLRA finalization

Preview of BaseCamp – look at how it is being used.

Written reservations re: agreement on the Path Forward document:

Greater Flagstaff Forests Partnership:

1 - Mixed vote of Partners, SO NO CLEAR #1: 6 w/o reservations @ #1; 2 w reservations @ #2; 1 abstain & 1 opposed @ #3; 0 @ #4

2 - Functional concerns

- * Sideboards too restrictive to accomplish ecological restoration across the landscape

- * Functional if not "strict" diameter cap fixed @ 16", especially since exceptions (other than CPMZ's) can be opposed/blocked

- * Post-treatment conditions from WSS still too limited/simple/constrained

- * Approved CWPP's not emphasized enough

GFFP looks forward to the 1st meeting when the Path Forward is not on the agenda.

Coconino Natural Resources Conservation District:

"CNRCD agrees with reservation to the subject Path Forward, subsection V.9., with the reservation being that to harness our future analysis and research, NEPA and otherwise, to the arbitrary definition of large trees, is contrary to efficient and effective management and contrary to accelerated treatment. Despite this, I believe we can work with this and succeed

We do not see significant socio-political consensus for making 16" dbh a unique or fundamental decision point for NEPA or other analysis. We know of no science based reason to do so. Including this in the Collaborative charter, or by reference, goes against Path Forward section IV, "...mechanisms that support highly efficient and effective program implementation.", and against Path Forward section V subsection 10 in its entirety."

Arizona Game and Fish Department:

The Arizona Game and Fish Department welcomes completion of the *Path Forward* document, dated March 24th, 2010. We appreciate the commitment and time invested by all stakeholders, setting the stage for successful implementation of the Four Forest Restoration Initiative (4FRI). The Department

supports the *Path Forward* at Level 2, “Agreement with Reservations.” In accordance with decision rules adopted by the 4FRI collaborative, we present the following documentation of our reservations.

1. Section V.7. We remain concerned by over-extension of results of the *Analysis of Small Diameter Wood Supply in Northern Arizona*. Like other participants in that effort, the Department understood the objective to be estimating the amount of wood fiber that could be harvested under various treatment scenarios. Analyses for the *Wood Supply Study* were relatively coarse, i.e., they were not spatially explicit and did not incorporate the full range of information available to inform ecologically-based restoration (e.g., site-specific reference conditions, range of natural variability in forest stand structure, etc.). Wildlife habitat objectives were not a formal part of the analysis, other than excluding treatments from some areas (e.g., Mexican Spotted Owl PACs). Desired post-treatment conditions articulated in the *Wood Supply Study* are general, hypothesized outcomes insufficient for developing site-specific prescriptions.
2. Section V.9. The 16” diameter limit on tree harvest is an arbitrary, socially-derived number. The available science does not indicate that trees >16” must be retained to restore the structure and function of Southwestern ponderosa pine forests or meet wildlife habitat needs within those ecosystems. In fact, there are many areas (including those identified in the *Path Forward*) where removal of large, post-settlement trees will be necessary to meet wildlife habitat and restoration objectives. The *Path Forward* contains a clause allowing removal of large, non old-growth trees. However, this exception process has yet to be defined and should not compromise attainment of wildlife habitat and other restoration objectives.
3. Section V.10. The same concerns articulated above apply to recommended application of initial sideboards across the 4FRI area.
4. The Department strongly supports a stakeholder-driven, collaborative approach to the 4FRI Initiative. The *Path Forward* document reflects significant efforts by a small and dedicated group of stakeholders. However, we are concerned that the document may not reflect the full range of stakeholder perspectives and could be construed as exclusionary by those who have yet to engage in the 4FRI effort.

The Ecological Restoration Institute

The ERI is in agreement at Agreement level 2, Agreement with Reservations, with regard to the *Path Forward* document presented on March 24th, 2010. Just to clarify, we agree in general but have some reservations. We recognize that those with reservations must express their reasons and have them recorded. The following articulates those reservations:

- Ecological restoration treatments should be based on a sound understanding of reference conditions, vegetation dynamics, natural variability, and the body of knowledge that exists about the effects of restoration experiments in Arizona and the SW. We feel that some of the language in number 7 and 9 under "Sideboards" does not meet those standards and seems to embrace a “one size fits all” approach.
- Number 7 under sideboards: We object to using the consensus scenario and elements of the Wood Supply Study as sideboards. We feel that this misinterprets what most members of the Wood Supply Study group thought they were agreeing to. The second paragraph attempts to clarify and interpret

the side boards but is not sufficient to fully reverse the misrepresentation of the study findings. The study was not designed to place limits on ecological restoration, but instead was just a method for calculating wood volume using different assumptions. Specifically, we disagree that the statements referred to in number 7 under "Sideboards" should be construed as technically/scientifically sound sideboards for area designations, post-treatment conditions, percentage of landscape management areas to be thinned, etc. Much more information and analysis is needed to develop specific and rigorous suggestions for appropriate ecological approaches.

- Number 9 under sideboards: We have the same general concerns noted above, plus the definition of large trees using a static diameter of 16 inches. Despite the statement that there is no strict diameter cap, the result of the large tree retention strategy could be interpreted by some as a 16 inch diameter cap. Such a static diameter definition ignores the fact that trees grow, and therefore that at the very least diameter definitions must change over time. The 16 inch diameter definition has been advocated for at least the past 20 years. Assuming a modest growth rate of 1.5 inches in diameter per decade, the diameter definition should currently be around 19 inches. Putting a 16 inch definition into place now would be an effective diameter retention limit for year 10 of 14.5 inches and for year 20 of 13 inches, a potentially severe constraint on achieving restoration objectives over the 20 yr life of the 4FRI agreement. Further a one size fits all diameter definition ignores the high site to site variability that characterizes the 4FRI landscape. We believe that a scientifically rigorous and technically sound analysis could produce some tree retention guides that would stand up to technical and scientific scrutiny. Absent that, we feel that such a large tree retention strategy could well be ignored entirely.