



May 2, 2022

Forest Supervisors Palmer, Bosworth, West, and Hannemann or Branton  
Four Forest Restoration Initiative  
Apache/Sitgreaves, Tonto, Coconino, and Kaibab National Forests

Dear Supervisors Palmer, Bosworth, West and Hannemann/Branton,

After six years of intense collaborative work on the Four Forest Restoration Initiative (4FRI), the Stakeholder Group (SHG) would like to commend the USDA Forest Service for all the collaborative work done on the Final Environmental Impact Statement (FEIS) and Draft Record of Decision (DROD) for the 4FRI Rim Country Analysis Area. The SHG feels that the collaborative work among all stakeholders and the Forest Service Team had a very positive influence on the final analyses. In particular, the final analyses and decision honored, or directly incorporated many of the recommendations provided by the SHG in their comments on the Draft EIS. Some notable examples include integrating the upland and aquatic condition-based management (CBM) into a more “holistic” approach, removing aggressive treatments for forest health (i.e., dwarf mistletoe) concerns, better definitions for old growth for ponderosa pine, the creation and management of “SALT” stands to preserve large trees, and the removal of interspace as a metric for treatment. Additionally, the FEIS fully incorporated the Monitoring Plan developed by and with the 4FRI Multiparty Monitoring Board (MPMB). We are grateful for this level of collaboration with the Forest Service in resolving these concerns. In addition, the Stakeholders would like to specifically extend their appreciation to the Interdisciplinary Team staff and Forest Service leadership for their commitment to the collaborative process and their ability to continually seek positive resolution.

The SHG recognizes Alternative 2 as representing the 4FRI collaborative vision of desired future conditions for the Four Forests: “landscape-scale restoration efforts across the Mogollon Rim that will support healthy, diverse stands, supporting abundant populations of native plants and animals; thriving communities in forested landscapes that pose little threat of destructive wildfire; and sustainable forest industries that strengthen local economies while conserving natural resources and aesthetic values” (The Path Forward<sup>1</sup>, 2010). While no document can possibly encapsulate the integral embodiment of so many different Stakeholders’ and Agencies’ individual visions, and while individual stakeholders may continue to seek adjustments on specific issues through the objection period, we believe that the DROD represents many of the Forest Service and Stakeholder Group’s common goals and desired future conditions for the 4FRI Rim Country Analysis Area.

The SHG worked on 6 priority issues and got to several common resolutions within each issue; however, the SHG did not have the time to work through a set of newer issues presented by the Forest Service at the end of the planning period. These include compliance with the Regional Mexican Spotted Owl (MSO) Leadership Forum, new analyses of Inventoried Roadless Areas (IRAs), and the existing analysis of steep slope treatments. We appreciate the Forest Service in providing this additional information. Without the necessary collaborative time to do our own analysis, the SHG supports the

continuing efforts of specific Stakeholder members that can work to better incorporate the results of the MSO Leadership Forum into Rim Country Project moving forward. The SHG recognizes lingering questions about the scale and scope of treatments in IRAs, and the limited treatment options analyzed for steep slopes. The SHG would like to continue working with the Forest Service to gain further clarity on these questions.


Additionally, the SHG recommends continued work with the Forest Service to establish and memorialize a Stakeholder Engagement process that emphasizes the future collaborative role in the Forest Service decision-making process. For example, the Multi-Party Monitoring Board has developed and coordinated monitoring efforts through the implementation of 4 FRI's 1st EIS. The SHG supports these continued partnerships to achieve monitoring and adaptive management outcomes with the Multi-Party Monitoring Board (MPMB), to implement comprehensive (i.e., non-thinning, non-burning) restoration outcomes with the Comprehensive Implementation Working Group (CIWG) and leveraging partner implementation dollars for 4FRI restoration projects. Other high priority implementation opportunities include working with the Forest Service to develop an allocation and tracking process to ensure activities are within the bounds of the effects analysis; and partnering to define and achieve landscape-scale treatment optimization and prioritization. Overall, the SHG recommends using the best available science to inform actions on the ground and continued collaboration with Stakeholders. The SHG looks forward, and remains committed, to continued engagement during the implementation of 4FRI Rim Country.

We look forward to continued collaborative and ecological success in 4FRI.


Sincerely,



Pascal Berlioux  
4FRI Co-Chair



Neil Chapman  
4FRI Co-Chair



Anne Mottek  
4FRI Co-Chair



Melanie Colavito  
4FRI Co-Chair



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Brad Worsley  
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<sup>1</sup> 4FRI Stakeholder Group. 2010. The Path Forward. Accessed at [https://4fri.org/wp-content/uploads/2018/04/path\\_forward\\_032410.pdf](https://4fri.org/wp-content/uploads/2018/04/path_forward_032410.pdf)