



September 2, 2011

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

SUBJECT: Proposed Action - 4FRI  
[http://www.fs.fed.us/nepa/nepa\\_project\\_exp.php?project=34857](http://www.fs.fed.us/nepa/nepa_project_exp.php?project=34857)

Dear Forest Supervisors Stewart and Williams:

The Greater Flagstaff Forests Partnership appreciates the opportunity to comment on the Revised Proposed Action, released on August 17, 2011. It is a much improved from the initial Proposed Action, and, in general, we commend the staff on both the effort spent and the product produced. As an organization, we support efforts to restore our forests, protect our communities, and enhance wood utilization opportunities: we strongly feel the 4FRI project expands those goals onto a landscape where such efforts are sorely needed, and we pledge our continued support to ensure such work occurs.

In an effort not to simply add volume to the record, let me state that we largely echo those comments provided by both the NAU Ecological Restoration Institute and the 4FRI Stakeholder Group. We are actively engaged with both groups and support the science and collaborative nature each provides to this effort.

We do, however, have three items we specifically wish to address:

1. We recognize that across as large a landscape as we are dealing with, that there was, and should be, a range of variability in terms of openings, basal area, canopy cover, tree size, etc. While we appreciate the need to identify ranges and averages, we do wish to see sufficient latitude in both language and practice to allow the full-spectrum of "historic inconsistency" (some thick, some thin, some open, etc) to be present following treatments.
2. At the Stakeholder Group meeting on Aug 24<sup>th</sup>, there was considerable dialogue on two topics that need attention:
  - a) Old Growth - We support the discussion to revise the language in the following manner: *"Old trees will not be targeted for removal (cutting) except in rare circumstances. An example of this would be to cut one in order to accommodate the turning radius of a logging truck, rather than relocating an entire road. Another would be removing one to address human health and safety concerns."*

- b) Large Tree Retention Strategy - We understand that you have included a modified version of this Stakeholder document in the Appendix, but feel that many members of this group laboured long-and-hard, at the request of the agency, to produce the final version of this document. From our meeting on the 24<sup>th</sup>, it is obvious that some feel their effort, and that work, has been disregarded. At the very least, in the spirit of collaboration and trust, we strongly encourage you to engage in an open discussion with the Stakeholders as to why this was not included as an integral part of the Proposed Action. We also recommend that you utilize the Strategy, in combination with other Stakeholder-approved documents (ex: Path Forward, Economics and Utilization, etc).
3. Social License, long identified as THE key to sustainable, long-term success, is based upon leadership, open-and-fruitful collaboration, effective-and-visible results, and continual communication. This requires attention to such things as tracking social awareness-and-attitudes in order to address emerging issues, developing a prepared workforce who becomes part of the economic solution, and reliable long-term wood supplies to support the required industry. Although attention is given in the Proposed Action (and elsewhere) to the necessity of “adaptive management and monitoring”, what seems to be absent are the social and economic monitoring requirements necessary for success. We urge the Forest Service to identify, support, and include such needs in this process, and to actively engage outside interests who can provide the technical assistance required in this endeavour.

Again, thanks for the opportunity to comment. We look forward to collaborating with the Forest Service as we progress through NEPA.

Respectfully,

Paul Summerfelt  
President, Board of Directors

CC: Members - GFFP  
City of Flagstaff - Mayor and Council  
Coconino County - Board of Supervisors