Substantive Comments regarding the letter from the Stakeholders to the Forest Service in response to discussions on October 14, 2011

4FRI Follow Up Letter on the Proposed Action and Large Tree Retention Strategy-24 Hours to Review

From: Diane Vosick

Date: Wed, 19 Oct 2011 at 11:27am

Hello everyone,

Last Friday the 4FRI Stakeholder Group was asked to attend a meeting called by the Forest Service to discuss our letter dated September 2nd, 2011 in response to the Proposed Action. Those organizations that included references to the 4FRI Large Tree Retention Strategy as a part of their response to the Proposed Action were asked to participate.

Attached is a draft of a letter from the Stakeholders with regard to the LTRS and Friday's meeting. After the meeting a small group of us determined that the letter should do the following:

- Reiterate the context of the LTRS (I lifted, almost verbatim the second paragraph of the letter from page 7 of the LTRS.
 It was changed to make grammatical sense).
- Make it clear that we will wait and see the outcome of the meeting with respect to how the LTRS are used to inform the
 process before endorsing anything yet.
- Acknowledge the two new documents that were discussed as innovative and an important step towards operationalizing the exceptions.
- Reiterate our desire to continue to collaborate.

This is now available for the next 24 hours for Stakeholder review and final approval. No response will be interpreted as agreement with the letter. If you have reservations about the letter please indicate your level of agreement (please refer to our Charter to see our decision process) and please express any reservations you have. At this point we do not have time to continue to edit the letter. It will be forwarded to the Forest Service at noon on Thursday, October 20th.

| Please feel to call me or contact me if you have questions. Diane (928-523-7854) | Please feel t | to call me d | or contact m | ne if you have | questions. | Diane (928-523-78 | 354) |
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Scott Harger commented on the message:

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I can accept this letter being sent as is, only since it appears to provide some kind of closure to the issues raised in the previous 4FRI letter on the same subject. We will call this agreement by acquiescence. But I see no objective purpose for this letter, since I can discern no request for, or expectation of, change in the PA on the part of either the USFS or the Stakeholder Group. If this letter is intended to document what "we" understand about what the forest service will attempt regarding geographic representation or translation of the LTRS, I think it will only be definitive to see this explained in a letter from the Forest Service, or in a response to PA comments, (or in the EA/EIS) so that it becomes part of the public record. Otherwise, these understandings are merely our assertions. And do we really need to condescend to explain the LRTS to the Forest Service again? If the LRTS now needs to be wrapped in "context", isn't that a constructive change? We are extending the debate while claiming to end it.

Initially upon hearing of this Friday's special meeting, I had some trouble accepting that those of us who considered the approach toward the LTRS within the Proposed Action reasonable and logical in the first place were not considered pertinent to discussions with USFS. Then I realized that the Forest Service was just being expedient to provide a more soothing, intimate discussion space for those who were emotionally unhinged by where the LTRS appeared in the Proposed Action. In support of this request from – let's call it a 4FRI Work Group – for stakeholder endorsement, stakeholders are not provided minutes, notes, agenda, attendees, discussion, or PA-related intended outcome, to assist their deliberation. Nor is any explanation given for the 24 hour deadline. I unhappily point out that these shortcomings violate the Charter guideline for transparency.

I view with alarm that the steering group (or perhaps more alarming: as Diane put it in this e-mail, "a small group of us") uses the stakeholders group to serve as window dressing to a subset of stakeholders who engage the Forest Service at close quarters and maneuver relentlessly for documentary advantage.

I recommend that the 4FRI re-focus upon monitoring and all its concomitant decisions, since baseline measurement strategies and opportunities begin to melt away starting right about now. On the management side, resolving which stakeholders will be offered Cooperative Status within the NEPA process, and what collaborative role the balance of the stakeholders will be offered, will likely be key to early division of labor, identification of resources, a prompt start to monitoring, and long term durability of the collaborative process. On the technical side, monitoring priorities need to be set and winnowed by practical considerations of relevancy, measurability and cost.

Scott Harger Program Range Conservationist Coconino NRCD 527.9050

Chris Knopp commented on the message:

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A very thoughtful letter Scott. Here are some comments. The stakeholders who were present at Friday's meeting were very careful to identify their position as representing only their organization. The meeting results will need to be vetted through the entire stakeholder community, but I did feel that the focused discussion was useful and served to highlight areas of concern that otherwise might have remained obfuscated in a larger meeting. There is now substance to bring to the larger group. I recognize your (and others) frustration with these meetings that focus on individual('s) issues, but in this case I believe it was beneficial to the overall group. It does not preclude other meetings if an outcome of Friday's meeting raises new controversy.

I was not aware that Friday's meeting was a closed discussion open only to those who shared a common concern. That may have been the perception, but it should not have been the intent or the reality. I'll follow up on this with Dick or Henry and offer a clarification regarding Friday's meeting and future meetings – namely that they're open to all.

You raised the question of whether we need to bring the LTRS back up with the Forest Service. I agree with your implied statement that we've already discussed it to a logical end. However, in this case the issue was how the 4FRI team was implementing the strategy and if they'd changed the intent in the process. My impression was that we had inadvertently changed it and that the change was important.

Lastly, you've raised the important point that the Stakeholder group needs to focus on monitoring. I agree. This was brought out in Friday's discussion when we talked about Stakeholder confidence that desired outcomes would be achieved based solely on the NEPA we are creating. The discussion led us to surmise that the NEPA would necessarily have a resolution tied to the landscape level analysis which might make some, used to much higher resolution, uncomfortable. However, comfort with the process is not limited to NEPA. In addition, we talked about a checklist that's been proposed to document the use of exception categories. The checklist, as well as BMPs and Forest Standards and Guidelines, for example, add a level of detail on how

unique situations will be handled when they're encountered. Finally, our adaptive management strategy is the last step to ensure that we achieve the desired outcomes. We agreed that more emphasis is needed here, just as you've pointed out. I would add that this 3 step process of landscape level NEPA, implementation rules, and adaptive management, appears to be developing as a foundation for how to implement a large landscape project. Our past reliance on very detailed NEPA appears to be unworkable at this scale.

If you'd like to discuss this or other related subjects please call me at 928-333-6300. Chris