



Steve Best, Forest Supervisor
Apache-Sitgreaves National Forest
30 South Chiricahua Drive
Springerville, AZ 85938

Re: 4FRI Stakeholder Trip to Little Creek Timber Sale

Dear Mr. Best,

On behalf of the Four Forest Restoration Initiative (4FRI) Stakeholder Group (SHG), we would like to thank you, Deputy Forest Supervisor Haskins, and other Forest staff for arranging and hosting the September 26, 2018 field trip to the Little Creek Timber Sale, part of the West Escudilla Project, located on the Apache-Sitgreaves National Forest (A-S), east of Alpine, Arizona. This letter summarizes our observations from the trip, concerns of the SHG, and proposed steps for moving forward.

This particular sale has garnered considerable attention; it was helpful to see the project first-hand and discuss aspects of its implementation with Forest staff. We particularly appreciated detailed information provided by the project silviculturist and his professionalism addressing a variety of challenging questions from the stakeholders.

The West Escudilla Environmental Assessment (EA) explicitly incorporated language from the first 4FRI Environmental Impact Statement (EIS) concerning retention of large and old trees. However, our observations on-site and post-treatment monitoring data collected by a stakeholder (Center for Biological Diversity [CBD]) showed extensive harvest of these trees, a portion of which were dated to between 200 and 300 years old. According to Forest staff, the rationale for removal was reducing the proliferation of dwarf mistletoe. However, pre-harvest stand exam data obtained by CBD indicated that only a tiny fraction of large/old trees had levels of mistletoe infection that would warrant removal under the thinning prescription for these stands. The post-harvest monitoring data also showed that targets for basal area reduction could have been met without harvesting large/old trees. This treatment approach is of great concern, being inconsistent with current restoration science, in violation of the 4FRI stakeholder "*Old Growth Protection and Large Tree Retention Strategy*," contrary to prior recommendations of the SHG regarding management of dwarf mistletoe, and, as noted during the discussion, having the potential to create significant controversy inside and outside the 4FRI arena.

During the trip, we heard mixed messages from Forest staff as to whether or not the Little Creek Sale was part of 4FRI, which was confusing to stakeholders. We understand that this sale is covered by separate NEPA; however, the West Escudilla project is part of "Bridge the Gap," an

effort spearheaded by 4FRI stakeholders to sustain local industry until the second 4FRI EIS (“Rim Country”) is completed. More importantly, since 2014, all acreage treated on the A-S under any NEPA, including West Escudilla, has been counted toward 4FRI accomplishments in annual reporting for the Collaborative Forest Landscape Restoration Program (CFLRP). The enabling legislation for this program (Collaborative Forest Landscape Restoration Act [CFLRA], 2009) is explicit about protection of old growth trees, and requires that a proposed project: “fully maintains, or contributes toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health and retaining the large trees contributing to old growth structure;” (Sec.4 (b)(1)(D), CFLRA 2009). The prescriptions we observed on the Little Creek Sale clearly do not meet the intent of the 4FRI CFLRP Project, as described by the Act. West Escudilla is a de facto part of 4FRI and from that standpoint must also respect the agreements and social license developed by the collaborative.

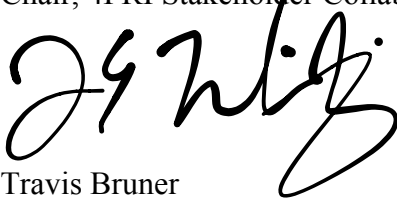
The Apache-Sitgreaves Forest Plan was revised under the 1982 Planning Rule, but developed with the intent of the current (2012) Planning Rule. Inherent in this direction is the intent to manage systems with “the need for forest restoration and conservation, watershed protection, and wildlife conservation; and the need for sound resource management under changing conditions. The new rule sets forth a process that is adaptive, science-based, [and] collaborative...” (36 CFR Part 219). The planning rule also dictates the use of best available science; however, the SHG was disappointed by the rather narrow perspective the Forest Service expressed with respect to controlling dwarf mistletoe on the Little Creek Sale area. While the forest plan is explicit about the need to address mistletoe, this can be done in a manner that more fully incorporates current science on the ecology of mistletoe and its management in an ecological restoration context.

Moving forward, the SHG expects that proposed treatments in the Rim Country EIS will follow both the directives in the CFLRA and the long-stated, unequivocal stakeholder positions on conservation of large/old trees. Per our discussions on the field trip, the SHG also expects that the Forest will revisit implementation of mechanical thinning treatments on portions of the Little Creek Sale that have not yet been cut, modifying the mark to address these concerns. Similar attention should be paid to forthcoming projects and timber sales on the A-S.

Members of the 4FRI SHG have spent nearly two decades building the social license that made landscape-scale restoration a reality on Arizona national forests. There is broad stakeholder consensus and science support for retaining old-growth trees, including wildlife habitat, increased genetic diversity, and potential increased fire and climate resiliency. That investment should be respected, especially as we approach completion of the Rim Country EIS.

Sincerely,

Jason Whiting
Chair, 4FRI Stakeholder Collaborative

A handwritten signature in black ink, appearing to read 'J Whiting', written in a cursive style.

Travis Bruner
Co-Chair, 4FRI Stakeholder Collaborative

A handwritten signature in black ink, appearing to read 'T Bruner', written in a cursive style.

Cc:

4FRI Board
Robbin Redman, 4FRI Planning Coordinator
Calvin Joyner, Southwestern Regional Forester
Victoria Christiansen, Forest Service Chief