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August 10, 2016

In response to the invitation I received on June 21, 2016, please find below my comments on the 4FRI Rim Country Project Proposed Action.

For context, I earned a Bachelor of Science in Forestry, a Master of Forestry, and a Ph.D. in Natural Resources and have a total of over 30 years of experience in forestry in the public and private sectors, including private industry management and planning, forestry consulting, teaching and research in higher education, and with the USDA Forest Service. In addition, I am a California Registered Professional Forester.

Based on my review of the Proposed Action document, I have the following nine comments:

1. Although the Scoping document does identify very broad target desired conditions (Table 7) the specific desired forest conditions that meet the stated proposed action goal "...to restore forest resiliency and ecosystem function in ponderosa pine forests..." (Proposed Action, page 1) are not specified. Instead Table 7 displays very broad ranges of target conditions based on basal area per acre (that has, unfortunately, no units of measure specified), trees per acre, and stand density index. Applying such ranges to a stand could result in extremely different stand structures and thus very different desired conditions;
2. No criteria are provided as to how to select stands for particular treatments;
3. No references exist to the literature that constitutes "...best available science" used—or is planned to be used—to develop prescriptions, "sustainability", or desired future conditions;
4. Except in the broadest sense, no specification of targets (*e.g.* acres in a particular condition class) for "sustainability" is included in the document;
5. The document contains little or no reference to how the Proposed Action will "Preserve cultural resources" or "Support sustainable forest products industries" (Scoping Document, page 3);
6. The document contains no mention of monitoring to help ensure that activities attain the goals of the project;
7. The treatment types described on pages 22-25 do not contain any quantifiable target for initial treatments nor quantifiable desired future conditions that these treatments are desired to accomplish;
8. The "socio-political importance" of large trees mentioned on pages 4 and 5, is not explained, making the reason for retaining "...as many large trees as possible..." unclear; and
9. A relatively minor point is that the "All Ponderosa Pine No Fire" value (2%) in Table 7 appears incorrect. If 49.96% of the acres have a 0% value for "No Fire" and the other 50.04% only has 1% "No Fire", arithmetically the Total Value cannot equal 2%.

Thank you for the opportunity to comment on this Proposed Action.

Sincerely,

Bruce E. Fox, Ph.D.