

Forest Service Planning NOI
C/O Bear West Company
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Bountiful, UT, 84010

RE: Scoping Comments on the Notice of Intent to Prepare an Environmental Impact Statement for National Forest Management Act National Forest System Land Management Planning Regulations

February 16, 2010

To Whom It May Concern:

On behalf of the undersigned organizations and individuals, we submit these comments in response to the Forest Service's notice of intent (NOI) to prepare an environmental impact statement to document environmental analysis for a new planning rule (Title 36, Code of Federal Regulations, Part 219) associated with the National Forest Management Act (16 U.S.C. § 1600 et seq.) (NFMA). This letter responds to key principles and questions posed within the NOI and highlights features that the undersigned organizations believe should form the basis of a new planning rule.

One overall principle, which we find to be lacking in the NOI, is the relationship between the USFS and sustainable rural communities. In recognition of Secretary Vilsack's key objectives for the USFS, we ask that you include the *sustainable communities* objective as a guiding principle in the EIS. The Secretary frequently references the importance of cultural, social, economic and resource issues that link Forest Service managed lands with local communities. Any Forest Service Planning Rule should recognize the symbiotic relationship between rural communities and public lands. We attempt to provide some specific context for the importance of sustainable communities in our answers to the specific questions herein.

The NOI asks the public to answer specific questions that the Forest Service (USFS) proposes to use to develop the new planning rule. Below we respond to those questions, and provide additional information regarding how the Forest Service should approach planning for the national forests and grasslands.

I. Substantive Principles for a New Rule.

A. What do you see as the biggest threat to forest and grassland health and ecosystem resiliency?

Forests and grasslands experience different health threats depending upon the local ecological context and social conditions. While there may be some broad common ecological threats to forests and grasslands (climate change, large scale stand replacing fires, uncharacteristic insect pandemics), the precise ecological realities of these broad

threats will vary by location. The planning rule needs to reflect these larger threats and their manifestation as site-specific conditions and threats, and be flexible enough to allow local land managers and stakeholders to address those issues within the regulatory framework and nationally determined resource concerns.

Perhaps the biggest threats are the lack of social and economic infrastructure to support forest and grassland health and ecosystem resiliency. Ongoing forest landscape fragmentation, lack of coordination among private and public landowners, and continued gridlock and conflict in planning and management processes are manifestations of these threats. Any plan that does not integrate the social and economic realities of land management activities will further exacerbate the decline in ecosystem health. The planning rule should encourage the Forest Service to consider the ecological, social and economic conditions across all ownerships within a given watershed as the basis for planning future action. A method to create social agreement, an economic system that rewards and supports ecosystem health, and an educated and skilled workforce to support federal land management could all be fostered through a better planning process.

B. How do you define restoration? What is your concept of restoration? How can the planning rule foster restoration of NFS lands?

Given that the threats to functioning national forests and grasslands will be specific to each locality, restoration -- or “increasing resilience and enhancing ecosystem function to support diverse species and habitats (including human use) “ -- is best defined at the ground level through a multi-stakeholder process. Restoration can improve or maintain ecosystem function as described in a desired outcome. If the desired outcome is driving the management actions, any flaws in the assumptions behind that desired outcome would lead to a failed result. Throughout history, natural resource management regimes have often failed due to insufficient consideration and inclusion of human social and economic systems. Desired outcomes must include restoration for relevant human uses, including recreation, product extraction, hunting and fishing, as well as restoration of habitat.

The following represent applicable principles for effective restoration planning.

- Locally and collaboratively define restoration plans and activities.
- Include clearly defined, realistic, and achievable goals.
- Provide for multi-party monitoring of implementation and outcomes.
- Establish an adaptive management mechanism for forest plan amendments as new information is available and learning happens.
- Establish uniform national goals and accountability systems to support decisions and performance at the local level.

- Use peer reviewed science and local knowledge to inform decision-making; this includes available social science applied to providing local community benefits.
- In the case of ambiguous science, provide for a simple system of applied science to test competing scientific generalities on a given landscape.
- Use best practices for implementation that are suitable to local ecological conditions;
- Link planning to realistic budget forecasts.

C. What kinds of conservation efforts can enhance ecosystem resiliency and prevent degradation?

We believe that conservation efforts are best determined based on local, site-specific needs. Regardless of the form of the conservation effort, it must be transparent and address the needs of all stakeholders. Adequate resources for private landowners, such as incentive programs, technical assistance, etc., will be vital to prevent degradation and increase ecosystem function on a landscape scale.

D. How can the planning rule be proactive and innovative in addressing the need for climate change adaptation and mitigation?

The planning rule *must* be proactive and innovative in addressing the need for climate change adaptation and mitigation. Incorporating adaptive management – which is premised on a robust monitoring requirement – into planning will be essential. This monitoring must include inspections for compliance with all labor laws in addition to ecological monitoring. Although the specifics of how climate change will affect national forests and grasslands are not yet known, we do know that plant and animal associations will change and move, and aquatic resources may be altered. The planning rule should make allowances for such changes, such as requiring the designation of reserves and movement corridors for plants and animals based on local conditions and resources, and the ability to adjust permissible activities in those reserves and corridors as climate impacts manifest themselves.

While it is difficult to predict long-range responses to alternations in climate and species migration (both vegetative and animal), the key aspect of planning will be its ability to include and prepare for a variety of responses to these changes. Such “adaptation planning” will be critical. For instance, climate change modeling shows conversion of the lower elevation of mixed-conifer forest in the Klamath Mountains to more open oak and coniferous woodland, yet the current forest plan disallows management for that conversion. It will be helpful if the forest plan revision process brings those models and that discussion into the collaborative process.

Natural system alterations in some parts of the country will likely result in drought, increased uncharacteristic wildfire, unreliable water supply and many other socially disruptive outcomes. This will have a disproportionately negative effect on many natural-resource dependent communities in the west. Rural communities already suffering from lack of investment, excessive poverty, and high unemployment will have few resources to deal with climate change impacts. Such impacts should be assessed and addressed. Identifying adaptation and mitigation strategies for the public land communities will be an important task for forest plan revision.

The planning rule must specify that the Forest Service take a collaborative approach to planning for climate change. Collaborative approaches, such as those used in the development and implementation of Community Wildfire Protection Plans could be expanded to include climate change considerations. Using a similar collaborative approach to climate change planning on a local level would provide multiple benefits such as the ability to discuss current available science, local knowledge, and engage in a multi-stakeholder process to engage in an all-lands approach to climate change adaptation and mitigation.

E. What kinds of data, research, and monitoring could assist land management planners to incorporate climate change adaptation considerations into plans?

In our experience, the Forest Service often does not have baseline data regarding the resources that it manages, or the monitoring data from past activities to inform its decisions. This includes data on social and economic impacts of past activities on communities, workers, non-timber forest product harvesters, Native American nations and other affected social groups. Without this information, it is impossible to make responsible management decisions, both at the forest and the project level. The planning rule should require the collection of such data over time, and a means to make the data accessible to the public. A robust monitoring of the success and use of reserves and corridors will be important.

Definitive information about climate change may not be available. In that case, the planning rule should encourage managers to use what information *is* available, disclose to stakeholders what data gaps exist, indicate what information would be necessary to fill those gaps, and then make decisions with the best data available. Action must proceed, even if the agency is unable to provide all the data envisioned by planners and cooperators. There must be a process, in the absence of baseline data, for responsible action in the interim. Cooperative processes involving adjacent and similar climatic zones to those projected in a given area may provide some of the data needed to fill such gaps.

F. How should the planning rule address uncertainty? How do other public and private entities recognize and incorporate uncertainty in their planning efforts?

Uncertainty should be regarded as an inevitable component of planning. The private sector deals with uncertainty by keeping flexibility in the plan and allows tactical changes as conditions change. The Forest Plan could create a range of plausible alternative future scenarios and try to create a plan that is robust across the range of different scenarios.

We would encourage the planning rule to recognize the role of technical advisory committees (TACs) that are comprised of multi-agency personnel and technical experts (including experts in the socioeconomic fields). TACs can review applicable literature and local information, and synthesize that body of knowledge for use with collaborative organizations in the planning process (both Forestwide and project-specific). TACs could be formed on a Forest or regional basis, with participation by Forest Service research stations, research institutions, and other organizations with expertise in the relevant fields. This TAC could then be responsible for managing the learning process necessary in the face of uncertainty. Perhaps a workable process of adaptive management could be created through this system. Although convening and maintaining TACs would require an expenditure of time and money, we believe that such expenditures would greatly benefit an informed planning process.

G. How can a new planning rule appropriately build in the flexibility land managers will need to adapt to changing science, information or conditions? What mechanisms should be used to incorporate new data? Do you know of any successful adaptive management regimes that can inform our process?

As stated previously, monitoring and adaptive management are key to informed planning and project implementation, and the planning rule should require both at the appropriate scales. In our experience, adaptive management has often failed because there was little emphasis (especially funding) placed on follow-up monitoring of on-the-ground projects. Without this information, it is impossible to learn from successes and failures, and to incorporate that information into future project design.

Generalized goals, accurate feedback loops (trend monitoring), and timely revisiting of the planning assumptions, could lead to a more simple and cost effective plan amendment process. A plan that allows flexibility could include differing treatments or practices to similar landscape segments for the specific purpose of acquiring data and learning.

Although it has largely failed due to lack of funding and the lack of a practicable mechanism to implement changes to the framework, the adaptive management procedures from the Northwest Forest Plan, including Adaptive Management Areas, should inform the agency's planning rule.

H. How should plans anticipate and address changing conditions or impacts outside of agency control? How can external factors be incorporated or recognized in plan guidance and requirements?

Collaborative planning at the landscape scale, rather than just at the scale of the administrative boundaries, is necessary. This will allow the LMP to incorporate the trends going on in adjacent private lands, incorporate relevant impacts on federal lands, and plan for how to address related needs of neighbors through assistance programs, easements, and other means.

There is a growing body of knowledge occurring under the general category and discipline of disturbance theory. These efforts could be accessed and included in the planning efforts, particularly those based on long-term considerations where natural unpredictability or inconsistent social commitments may be anticipated.

I. Should a new planning rule include standards to address watershed health? If so, what might those look like? Should the Agency be held accountable only for actions and problems on its NFS lands or take into account water availability and quality factors that are outside of the Agency's control?

The new planning rule should require standards that address watershed health. Although they are not perfect and in some cases have constrained proactive beneficial watershed restoration, the Aquatic Conservation Strategy Objectives of the Northwest Forest Plan, and the aquatic provisions of PACFISH and INFISH provide useful examples of metrics designed to protect and restore watershed health. The next iteration of the planning rule should significantly improve upon these past strategies.

Although the agency must consider the condition of surrounding lands, especially when conditions on those lands affect national forests and grasslands, the agency should not be “held accountable” for those actions and problems. In general, the NEPA environmental analysis process requires the agency to address these non-jurisdictional issues, but recognizes that the agency cannot exercise control over them.

While not being held accountable is important, so is recognizing the Agency's potential contribution to dealing with those issues. Currently, work done on private lands (e.g., under the Wyden Authority) is not counted in FS performance measures, which is a disincentive for working across the fence line. Fixing this problem, by allowing for plans to address private lands and then get recognized for doing so, is important to ensuring that private land work occurs where it is critically needed.

J. What planning or management guidance could the Agency incorporate in the rule to protect and enhance water resources?

Protecting and enhancing water resources is critical to many private land issues across the West. Much of the West's water resources originate on public lands and eventually get used on private lands for irrigation or other municipal purposes. In many cases agriculture/ranching is the primary user (often over 90% of water demand in a given basin). The impact to water resources from federal land management is immense, especially in the face of climate change where one plausible scenario for much of the west is less snowpack due to warmer winters. Therefore, in the context of water resources, local collaboration could ensure local values are captured in water resource management.

The planning rule should require the consideration of available nonfederal guidance pertaining to water resources. For example, the state of California has "basin plans" that address water quality issues, which can be instructive to the agency in managing its aquatic and terrestrial resources.

Water leaving the NFS lands should be tested and evaluated so that measurements of downstream impacts can be obtained. This would create a baseline and eligibility for ecosystem services and/or a basis for nonpoint source identification.

K. One way to approach planning for an NFS unit is to think about the future of the planning area through the context of its watersheds. Do you see benefits and/or drawbacks to a rule requiring land management planning on a watershed basis?

We support planning through the context of a Forest's watersheds when each Forest determines the plan specifics. However, experience has shown us that watersheds that include multiple National Forests and States have no social or political infrastructure for planning. Requiring land management planning on a watershed basis is not practical if it requires basin plans to which lower order watershed plans tier. The issue is scale and availability of information.

Watershed level planning usually involves multiple ownerships and the creation of collaborative groups consisting of participant owners and managers should be a priority in these exercises. (The NRCS CRM model, for example)

L. Do you see benefits or drawbacks to a rule-requiring adherence to regionally specific Best Management Practices?

Regional Best Management Practices are often too generic to be useful in local conditions. Locally specific BMP's are more appropriate and able to be modified by new information and experiences.

M. How should the new rule provide for diversity?

Providing for diversity in a world that may experience quick migration of plants and animals due to climate change will again call for a flexible, adaptable, data rich plan. Such a plan must be set up for quick and affordable amendments as new data becomes available. While indicator species can provide some reference information, it is the overall ecosystem functions that assure diversity. Resilience may be the more proper indicator.

N. How should the planning rule guide protection of at-risk species of animals and plants and their habitat?

We believe that monitoring population trends of at-risk species, protecting their habitat from applicable threats, and protecting individual species is essential to ensuring that a diversity of species thrive and do not become listed under the Endangered Species Act. Although it has proven costly and perhaps over-broad, the Survey and Manage program of the Northwest Forest Plan is one example of this approach and should be examined and improved. For instance, as survey results are accumulated, it should become possible to establish sampling protocols that reduce costs and provide dependable evidence of presence or absence based on similar landscape characteristics and spot-checks for verification.

O. How can the new planning rule account for variables outside of Agency control, including those impacts that are the result of climate change?

Please see I.I. As variables are identified, planning options could be provided. If, for instance, climate change, and the resultant wildfires are destroying critical habitat which is “protected” by reserves that disallow management, and it is determined that thinning from below may protect that habitat, then that must be allowed under the forest plan. This “if, then,” scenario may be a key aspect of the next iteration of planning documents.

P. Should species diversity provisions in planning look beyond the individual unit to a watershed or landscape scale, and if so, what is a practical and workable way to incorporate a broader perspective?

The scale at which diversity is measured will depend on the species. Some species are endemic to small areas, so measuring their diversity at large scales is inappropriate. Other species are range across multiple watersheds. In general, whatever the scale of the management effort, lands should be managed for overall resiliency and ecosystem function.

Q. How could wildlife habitat monitoring be addressed in a planning rule?

Monitoring is essential to assessing the effects of on-the-ground management. Habitat conditions and availability can be used as a proxy to validate management decisions, but only if there is a complete feedback loop, i.e., the proxy is directly linked to desired outcomes. The planning rule should require that monitoring actually occur, if habitat conditions are used as a surrogate for the health of other resources or forest and grassland conditions. Both habitat condition and species numbers should be monitored. One is not the surrogate for the other.

R. How can the planning rule reflect the interdependency of social, economic, and ecological systems in a way that supports sustainable management of national forests and grasslands?

The Forest Plans must analyze all three systems equally and give weight to all. The only effective way to do this is to incorporate active multi-stakeholder involvement throughout the planning process.

The USFS responsibility to social and economic systems, especially those of neighboring rural communities, is well recognized in public law (e.g. National Forest-Dependent Rural Communities Economic Diversification Act of 1990, Healthy Forest Restoration Act, and others). The planning rule must contain a framework to consider social and economic systems and their relationship to land management planning.

In particular, Agency planning decisions impact the social and economic systems of neighboring rural communities and must consider the impacts on these systems in planning decisions. The Agency should assess how past actions have positively or negatively impacted local communities and provide a way to mitigate the social impacts of past actions and future actions on adjacent communities. LMPs often address what can be done, not how it will be done or who will do it; that needs to change. Landscape scale management considerations will require interactions with neighboring landowners and communities, these neighboring social systems are particularly relevant in certain areas, as evidenced by experiences in managing wildland fire. Climate change, and its inherent landscape scale impacts, will bring increased challenges that will demand positive interactions with social and economic systems.

Increasingly the focus of the agency has shifted from an extraction-based decision structure to a system that is based on the restoration and maintenance of ecosystem values – such as healthy watersheds, clean air, clean water, etc. This shift in focus has an impact on neighboring rural communities, whose economies are inextricably linked to activities on public lands. Fortunately, land management activities focused on ecosystem restoration and watershed stewardship can and do provide economic opportunities for local, rural communities. However, plans and resultant work opportunities must be structured in an appropriate manner for these rural communities to partner with the agencies and to maintain a scale that is supportive of land management decisions based on a restoration and maintenance objective. Consideration of the agencies' impact on

local economies should be integrated into the planning process, encouraging units to maximize contributions to local workforce and enterprises that support the mission of the agency and the objectives of the specific management plan. Further, the planning rule should provide guidelines that promote the use of contracting mechanisms that facilitate compliance with all labor laws including payment of prevailing wages and creation of safe working conditions.

Current forest plans have zoned the forest into “timber management zones” or “matrix”. The new planning rule should also address extraction activities in a manner that integrates them with activities that enhance and/or maintain ecosystem function. Plans should also assess the economic impact of those activities and extractions and make clear the local impacts from such activities.

Planning and implementation should not penalize low population areas or adversely impact rural America for the benefit of higher population areas. Solutions that integrate societal goals across income levels and urban/rural boundaries must be developed.

S. How can the Agency recognize and incorporate provisions in the planning rule for managing lands for the sustainable delivery of ecosystem services?

The USFS has traditionally provided for timber, minerals, forage, recreational opportunities, and other services. The Agency should also provide for ecosystem services. Increasingly, economists are developing methods to evaluate and “put a price tag” on clean air, clean water, carbon sequestration, wildlife, and other resources that have traditionally not been afforded an economic value. The planning rule could require this accounting, thus providing the public with a full understanding of the value of national forests and grasslands beyond traditional “outputs,” as well as the associated costs to maintain and enhance ecosystem services over time.

Markets and multiple valuation of the benefits of forests are essential to long-term stewardship both on private and public lands. These can create incentives for sustained stewardship of the whole land base. Federal lands can be used for research into and the development of standards that could be integrated with other USDA efforts to provide an accounting structure benefiting agriculture and forestry throughout the nation. An assessment of the cost of maintaining ecosystem services should be part of the planning process, as well as a plan for mitigating any adverse effects to the adjacent communities. The assessment and plan must be done in cooperation with local governments and community groups.

T. How can plans guide units of the NFS in achieving natural resource conservation and restoration goals in a way that is compatible with providing a set of opportunities for goods and services to support vibrant rural and national economies?

Public land management and neighboring rural economies are unquestionably interrelated and the activities in one system will impact the other. Consequently, it should be a requirement of any planning rule that local community economies are considered in the initial assessment and analysis. This should be done collaboratively with the communities in question. An inclusive (including labor, environmental, commodity, recreation and other groups), transparent, collaborative process for assessing the state of the local economy will bring in local knowledge about local conditions that will inform the process of collaboratively defining desired outcomes. Further, land management planning processes should be required to collaboratively define desired outcomes for local communities, to which purpose and need statements may be tiered, so that social and economic outcomes are legitimized in project level NEPA. This should include analyzing procurement and market options to see which optimize the integration of ecologic, social, and economic goals at the adjacent community level. The examination of the Canadian co-management models would be instructive in the assessment.

II. Process Principles for a New Rule.

A. How could the Agency foster collaborative efforts? What kinds of participation, forums for collaboration, and methods of providing input have you found most engaging?

The best way to foster collaborative efforts in the implementation of the new planning rule would be for the Agency to develop and implement the rule through a process that models effective collaboration – open, transparent, accessible, and inclusive of the broad range of concerned stakeholders. The Agency’s planning rule website, however, says that although “public involvement can span a spectrum that includes informing, involving, consulting, and collaborating with the public,” many aspects of the rulemaking effort “will align more closely with the categories of ‘inform, consult, and involve.’” That negative message is further reinforced by the Agency allowing only a very short time for public scoping meetings (four months, with one month already elapsed with no meeting dates or places announced) and a subsequent gap of at least nine months until further public meetings are planned. We hope the Agency will consider modifying its rulemaking process to be more open and collaborative, and would be happy to help facilitate that.

A collaborative process may have multiple avenues for participation -- in person, by conference call, by video conferencing or other electronic avenues, or by any other means that is situation appropriate. In our experience, the particular methods of engagement that prove most effective tend to vary from place to place, but usually include some

combination of full collaborative group meetings, subcommittee work, one-on-one discussions, and field tours or studies. Wide distribution of meeting minutes and/or newsletters, the creation of project websites and blogs, presentations to community groups, and other techniques can be very effective in keeping non-participants informed about collaborative efforts and continually encouraging their input.

A transparent, open, and broad-based process provides benefits to the Agency and stakeholders alike, and can extend well beyond plan development and revision, creating a collaborative social infrastructure for most kinds of Agency-related activities such as planning, reporting, volunteer recruitment, public education, etc.

B. What should the rule require to ensure a planning process that is both efficient and transparent while allowing for full public collaboration and participation within a reasonable timeframe?

The new planning rule should require only four mandatory process elements.

1. Broad participation, encompassing to the extent possible the full range of concerned stakeholder interests, including affected federal land management agencies.
2. Commitment by all participants to seek positive means to solve common problems or achieve common goals regarding federal land management.
3. An operational process which is open, inclusive, accessible, and transparent, and which includes a method, developed and agreed upon by participants, by which their collaborative decisions will be made.
4. Active outreach by agency officials to assure that all affected social groups (including workers, harvesters of non-timber forest products, Native American nations, and other hard-to-reach groups) are fully informed about the process and have equal opportunity to participate.

The process specifics should not be further defined in the rule, but rather be developed at the appropriate level (forest, watershed, region, etc.).

The process should afford stakeholders an opportunity to participate collaboratively and substantively not only in plan development, but also in plan implementation, monitoring and evaluation, and revision(s). It should be flexible enough to enable existing collaborative groups, where they exist, to be utilized, and to facilitate the establishment of new groups where they do not. Because not all communities, or identifiable social groups such as workers and harvesters of non-timber forest products, will have an existing capacity to develop and support a collaborative process, field level Agency outreach and assistance should be mobilized when necessary to catalyze some collaborative planning efforts.

What constitutes a “reasonable” timeframe will differ from place to place depending upon numerous factors such as whether or not there is an existing collaborative process to work with, the degree of controversy over management goals and techniques, the

availability of necessary scientific and technical information, the adequacy of Agency staff and financial resources, and the extent of community capacity and leadership and compensatory support dedicated to the success of these efforts.

C. What kinds of information, methods, and analyses should the Agency provide to the public during the planning process to aid understanding of the possible consequences of a proposed rule and alternatives?

The USFS should provide the public with as much information as possible about the effects of the planning rule, and any alternatives to it. In our experience, planning processes that are effective include the public early on, and are transparent about the rationale behind decisions that are made. We would encourage the agency do so as it moves forward with the new rule.

Communication and collaborative involvement with the public needs to be ongoing throughout the planning process, not suspended during the period between scoping and the release of the draft EIS. The development of alternatives is one area in which effective collaboration can be of substantial benefit to both the Agency and the public. As the CEQ handbook *Collaboration in NEPA* points out, “Collaboratively developed alternatives are more likely to withstand external challenges because such an approach enables stakeholders to have a meaningful role in choosing among alternatives when developing the Draft EIS.”

Collaborative analysis of the affected environment and the environmental impacts of alternatives is also desirable. CEQ says, “Collaboration can not only improve the credibility of the technical analysis, but also its legitimacy in the eyes of diverse stakeholders.” Our collective experience in facilitating and/or participating in numerous collaborative processes confirms that finding.

One specific area where information appears to be lacking is an analysis of the costs of planning within the USFS. Questions that might begin to inform such an analysis are: What does it cost to write a land management plan under the old planning rules? To revise it? What would it cost to write a land management plan under the new proposed rules? To revise it? What are the true costs associated with full and effective monitoring of a land management plan? How can the USFS ensure sufficient funds to carryout land management plans, including monitoring, and what types of contingency plans should be available when budget forecasts fail? Such an analysis would benefit the agency and stakeholders when considering the merits of a new planning rule.

D. What kind of administrative review process should be offered to the public in the planning rule? Should there be a pre-decisional objection or a post-decisional appeal process?

Although the public is more familiar with post-decisional appeal processes, pre-decisional objection procedures may represent a better way of encouraging public engagement with the Agency before a final decision is made. Should the Agency move to a pre-decisional objection process, it is important that the Agency make available to the public all of the necessary information (specialist reports, maps, etc) to make an informed decision, and not present to the public a partially formed or completed proposal for analysis, which can result in “surprises” once the final decision is issued. It is also important that a pre-decisional process and the discussions with the objector be carried out in public.

E. How should the planning rule account for the relationship of NFS lands to surrounding landscapes?

Addressing threats and establishing effective conservation and increased health of public lands can only be achieved through partnerships with private landowners. Certain factors are not limited by NFS boundaries and must be broadly responded to if any success is to be realized. Society can no longer afford to dissect the landscape into ownership fragments for planning, implementation and protection of its valuable natural assets. Recognition of landscape-scale assessments and the potential impact of actions on non-NFS lands must be included in planning procedures.

At the very least, each Forest Plan should have a section in it describing cross boundary issues and a task group that includes private, state, corporate and public land managers should inform that part of the plan.

Participating landowners and land managers would give up none of their ownership or decisionmaking rights, but would be able to share their knowledge and expertise, working with other stakeholders to help shape appropriate locally-specific approaches to sustainable “all lands” management. Participation in the development of those approaches would likely have a positive impact on at least some landowners’ decisions on whether to implement them on their own lands.

Private landowner participation in effective partnership and collaboration will need effective private land conservation incentives in place. Market valuation and strategies should be established to ensure that these surrounding landscapes are managed for a full range of values.

F. What other planning and assessment efforts or processes at the national, state or local level should the Agency look at that could inform an “all-lands” approach?

Examples include:

Model Forest planning and monitoring processes in Canada and elsewhere in the world; state forest assessments and plans, Community Wildfire Protection Planning, the Blackfoot Challenge (Montana) – collaborative management and community forest ownership in the Blackfoot Valley, numerous place based collaborative planning processes primarily led by NGO’s like the Blackfoot Challenge and Swan Ecosystem Center (Montana), Wallowa Resources (NE Oregon), The Watershed Center (N. California), etc. Each of these examples has conducted biological and social assessments across all ownerships to inform projects simultaneously on public and private lands.

Other examples are State Wildlife Action Plans, and the Western Governors regional wildlife, infrastructure and water planning efforts and Oregon’s OWEB planning processes.

G. How can the planning rule support the creation of a shared vision for each planning area through the planning process?

Often a shared vision doesn’t need to be created, but rather emerges in whole or in part when the participants in a collaboration express their individual views of the desired future for their community and environment. Discovering the extent of participants’ common ground is the first step in the collaborative process. The support of an effective and inclusive collaborative process lays the foundation for the more difficult work of crafting the specifics of a plan for accomplishing the shared vision.

H. Local and regional differences will have an impact on desired conditions and on the successful creation and implementation of a shared vision for any given planning area. Given that different areas will have different needs, should the planning rule allow a choice of planning processes? How could the planning rule create different process choices, and how could they be presented in the rule? What kinds of provisions would need to be included to guide and evaluate a process choice?

Please refer to II. B.

Because the planning rule will apply to *national* forests and grasslands, we believe that whatever planning process is utilized should be uniform across all units. This is not to say, however, that the outcomes from that planning process will be the same. Instead, the process should provide a framework within which local stakeholders are able to address local ecological and socioeconomic issues through site-specific plans.

- I. Much discussion has been centered on how land management plans should be viewed; are they strategic documents that lay the foundation for specific future actions to help meet unit goals? Or, should land management plans also make project or activity decisions?**

Current land management plans provide the framework, including setting forth numeric and narrative standards, guidelines and land allocations for future management on the national forest or grassland. They are, therefore, more than “strategic documents.” Future land management plans should not make site-specific project or activity decisions, as that is a secondary process that is better addressed on the regional or even forest-level scale. They should provide broad guidelines and clarity on the intended outcomes of activities, both on the site level and on trends across the planning landscape.

- J. Based on your response to the question above, what is the range of options for fully complying with NEPA during land management plan development, amendment, or revision?**

In preparing joint responses to this NOI, we were unable to reach consensus regarding a satisfactory response to this question. This indicates to us that broad stakeholder collaboration will be essential throughout the development of the new planning rule in order to develop workable solutions to some of the NEPA and process issues that are inherently involved in this revision. Only working together will we be able to develop a planning rule that functions in a fair, effective and timely manner.

- K. Should the new planning rule require standards and guidelines that are required for all plans?**

Beyond the requisite provisions called for by the National Forest Management Act, the new rule should not require that identical standards and guidelines be part of all forest plans. The planning rule should direct forests to create standards and guidelines that are appropriate for and applicable to the specific ecological and socioeconomic conditions of each forest or grassland.

- L. How can the agency analyze and describe the environmental effects of a planning rule in the environmental impact statement?**

Please see II.J.

III. Additional Planning Considerations.

- A. Planning, Budgeting, and Accountability.**

Currently, there is a disconnect between land management planning and USFS budgeting processes. Plans must be grounded in financial realities. The Forest Service, as a part of

the planning rule revision process, should consider strengthening the connections between the Agency's budget allocation processes, planning requirements, and accountability (performance) structures in the agency.

Budget allocation processes must be transparent and understood to all stakeholders in the land management planning process. Under the current system, the management actions called for under a forest plan are not fully funded; monitoring and on the ground projects are often woefully under-funded at the expense of other activities. Ideally, under the revised planning rule, systems would be put in place to better anticipate budget realities and create forest plans that are financially realistic. It is very important that budget considerations be an integral part of the planning assessment.

Sincerely,

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