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High Level Summary of Collaborative Input for Forest Planning Rule Revision, Spring 2010

Prepared by Meridian Institute

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This report summarizes at a very high level, the input received from the collaboration activities conducted from March through May, 2010, including a science forum, three national roundtables, approximately 40 regional roundtables, a Tribal roundtable conference call, and a Forest Service staff conference call. The perspectives and judgments about what to include in this document are those of the Meridian Institute.

www.merid.org

Colorado Office PO Box 1829 • 105 Village Place • Dillon, CO 80435 USA • Main Number: +1.970.513.8340 • Fax: +1.970.513.8348

Washington, DC Office 1920 L Street, NW • Suite 500 • Washington, DC 20036 USA • Main Number: +1.202.354.6440 • Fax: +1.202.354.6441

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I. INTRODUCTION

This report summarizes at a very high level, the input received from the collaboration activities conducted from March through May, 2010, including a science forum, three national roundtables, approximately 40 regional roundtables, a Tribal roundtable conference call, and a Forest Service staff conference call.

Given the breadth of input provided by a large number of stakeholders at numerous separate events, this is not an exhaustive summary of all the input the Forest Service has received. This document is organized around questions in a discussion guide that was developed for the roundtable events. For each question, we have attempted to identify the significant cross cutting themes and major points of convergence or divergence that emerged from all the discussions, some explanation of the rationale behind various perspectives, and in some cases, a few ideas that illustrate differing points of view. The perspectives and judgments about what to include in this document are those of the Meridian Institute. For a more detail understanding of the input provided by over three thousand stakeholders at these events, please review the individual summaries of each of those events. Links to individual summaries are available in Appendix A and on the Planning Rule Website: http://fs.usda.gov/planningrule.

II. SUBSTANTIVE TOPICS

A. Restoration

1. *What if anything, should the rule provide regarding restoration?*

   There were a range of views regarding whether the rule should say anything about restoration and, if so, what. No stakeholders argued that the rule should require restoration to occur regardless of whether there is a need for restoration. On the other end, no stakeholders argued in favor of an all out prohibition on restoration.

   Some stakeholders expressed the view that the concept of restoration should not be mentioned explicitly in the rule. The reasoning behind this perspective was that the NFMA is silent on the concept of restoration; restoration is just one tool of many available to managers; the concept of restoration will be implicitly addressed as part of habitat management; and, including specific language about restoration in the rule

could open up the Forest Service to unnecessary lawsuits.

On the other hand, those desiring the rule to be explicit about restoration generally said the topic is simply too important to leave out, and noted that the Forest Service Chief has already indicated that it will be a high priority in forest planning. Discussion generally centered on definitional issues such as how explicit the rule should be regarding restoration and what specifically should be required at the forest plan level. Some suggested that the planning rule could identify restoration priorities, such as sites damaged by extraction activities; lands crucial to habitat connectivity; lands damaged by noxious weeds or invasive species; and economic resources such as water for industry and watersheds.

Others suggested restoration priority should be given to sites that are most degraded or removed from a defined "normal" baseline.

Definition of Restoration

Essentially everyone agreed that the term "restoration" needs to be clearly defined and explained if it is used in the rule.

For example, there needs to be clarity about when the term is being applied to activities associated with cleaning up or rehabilitating a site that has been disturbed or damaged by a management activity as compared to when the term is used for a longer-term process of either restoring an area to a previously existing ecological state, or to a higher level of ecological functionality or resiliency. A few stakeholders were disturbed by what they perceived as an assumption that all forest lands are degraded and need to be restored.

Many stakeholders said that restoration should be viewed as a process towards the goal of ecosystem resiliency – and that an understanding of ecosystem functioning in the area over time can help inform the restoration process. Many also clearly said that it is unrealistic in most cases to "restore" ecosystems to something that existed in the past – because ecosystems are dynamic, because climate change may make it impossible to go "backward," and because it is so hard to agree on the "best" or even the most appropriate historical point of reference. Some went so far as to suggest that the use of the term restoration is problematic because so many people associate the word with the un-implementable notion of going back to some historical point in time – even though that might not be what is intended. Many liked the definition that is currently in the Forest Service Interim Directive. Some participants did suggest that there needs to be some flexibility to define the meaning of restoration at multiple levels.

Restoration Needs Assessment

For those who were open to including requirements in the rule regarding restoration, many supported including a requirement for a forest-level restoration needs assessments to ensure coherent restoration strategies.

Of those open to including restoration requirements, many thought a restoration needs assessments should include participation from community stakeholders (e.g., perhaps utilizing Restoration Advisory Committees in helping determine priorities for restoration and groups such as the Youth Conservation Corps to help conduct field work). Collaborative groups, consisting of federal state and local governments, NGOs, users and other stakeholders could help to define the goals of restoration in each forest. They said that there should be clearly delineated ways for the public to become involved in these projects. Similarly, they noted that some restoration activities may need to occur across jurisdictional boundaries, and partnerships with surrounding lands may support these kinds of activities.

Many suggested that the rule should only define the criteria and the process for conducting assessments and not dictate specific approaches. Many participants said that the planning rule should acknowledge the important role that natural disturbances such as fire play in maintaining forest health. A few suggested that restoration assessments should be broad enough to encompass social and economic as well as ecological considerations. It was noted that if restoration were to occur across National Forest lands, the scale would be very large. There are planning issues and costs with doing anything at that large of a scale that need to be considered in this decision. The Forest Service cannot afford to practice "random acts of restoration," they said and they suggested a number of different ways to assess restoration. They noted that new technologies and monitoring techniques will allow assessments to be carried out more efficiently. They also noted that it could be helpful to consider metrics that are easy to measure and analyze when designing an analysis. Scientists as well as participants in the roundtables suggested that constant monitoring would make assessing restoration needs and results easier.

Triggers for Restoration

To the extent groups discussed the use of triggers for restoration, most suggested that the rule should only specify that forest plans could establish triggers based on local needs and conditions, but not dictate further details.

Some suggested that forest plans should identify triggers, thresholds and benchmarks that are tied to monitoring and restoration; these benchmarks should be derived from the desired conditions of the forests and should be forest-specific. Other participants proposed that forests should be required to maintain desired conditions once they have been attained.

2. *The precautionary principle has been suggested as one framework for forest planning. Should the rule include key concepts from the precautionary principle? If so, which ones, and what would be the implications of incorporating them? Are there alternative ways to address those concepts?*

   The conversations around the precautionary principle focused mostly on trying to understand the concept and what it might mean in the planning rule context. Some said the term should not be used in the rule because it is so poorly understood, and could be misconstrued or misused. Others suggested that the rule should include a precautionary (try to do no harm) approach without actually using the term. Some suggested that, if used, the concept should apply to social and economic systems as well as ecological. In any case, there should be clarity and transparency about whichever approaches are being required in the rule and utilized at the forest plan level.

B. Climate Change

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

   There were two general perspectives expressed about how climate change should be addressed in the rule. One was that climate change is such a fundamental ecosystem stressor that it needs be addressed explicitly in the rule. The other was that climate change does not need to be mentioned in the rule. However, people had different reasons for this suggestion. Some believe there is too much uncertainty about the causes and effects of climate change (particularly at the forest level). Others thought the rule could include adequate provisions for dealing with changing conductions in general without needing to mention climate change specifically, and that in fact specific reference to climate change could result in unnecessary controversy.

   For those who felt that climate change should be mentioned in the rule, specific suggestions about what the rule might say about climate change included:

   - Acknowledge the uncertainties.
   - "Consider" climate change in the planning process, but because there is significant uncertainty about likely impacts, do not try to address it proactively.
   - Provide guidance regarding the scale at which planners should assess likely climate change impacts.
   - Acknowledge the diversity of local climate conditions and empower planners to use a diversity of management strategies.
   - Use scenario planning (e.g., under "x" conditions, take this management approach; under "y" conditions, take that management approach).
   - Frame climate change as one of many disturbance events (including fire, invasive species infestations, ice storms, etc.).

- Require management plans to identify risks pertinent to that forest or grassland, but not specify which risks are pertinent to local management units;
- Encourage planners to focus on cultivating the adaptability of the ecological communities they manage.
- Manage for species and habitat viability by protecting refugia and "adaptation corridors".
- Avoid exacerbating existing system threats.
- Manage with the aim of increasing the resilience of ecological communities;
- Manage for ecological redundancy as a defensive strategy.
- Continually adapt and refine tools (for monitoring, etc.) to gain a stronger understanding of climate change impacts.
- Identify trigger points for updating management plans.
- Incorporate Native American interests and knowledge with respect to assessing and responding to changing conditions.

C. Watershed Health

1. *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?*

   There did not appear to be any support for the idea that the Forest Service be held accountable for actions and problems associated with water quality and/or availability beyond its jurisdiction.

   However there was a lot of concurrence around the suggestion that the rule should require analysis of water resources - as well as assessment of social, economic, and other ecological factors. Some thought the scale at which this is done up to the individual forest plans. Others thought the rule should speak to the role of National Forests in addressing water quality and quantity both within National Forest lands as well as upstream and downstream. Noting the connections between several of the breakout group topics, several participants asked whether protecting water resources should be addressed under the topic of restoration in the rule.

2. *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 planning on a watershed basis?*

   There was a lot of support for watershed level approaches, but there was also a concern that the rule should avoid a "one size fits all" approach or dictating a specific form of watershed management given the extreme variability in water resources around the country.

Planning at the watershed level is an approach that is easily understood and can enable consideration of groundwater recharge and storage. Also, a watershed approach may enable coordination with other jurisdictions and adjacent landowners, possibly through collaboration or official memorandums of understanding. Yet, watershed-scale planning is often not appropriate to address plant and animal range connectivity, natural disturbances, or the way that people in a watershed organize themselves. Planning at the sub-watershed scale may correlate better with where people live, and can facilitate working with members of the public to institute land use changes. Also, Forest Service units are currently not organized by watershed. As an alternative, monitoring alone could be done at a watershed level. Or planning could be organized based on the issues that are most important to a particular forest such as community uses, wilderness or water. Some suggested that the planning rule identify planning on a watershed basis as one option, but leave it up to the individual forests to determine the best way to organize planning.

3. ***Should a new planning rule include standards to address watershed health? Why or why not? Should the planning rule require that forest plans include custom standards to meet local conditions? Why or why not?***

   There was a divergence of opinions on this question. Some suggested that the planning rule should require forest plans to determine standards or other requirement to ensure watershed health; rather than including standards in the rule itself. Others felt that the rule should have standards that address watershed health in general, as well as guidance to protect and enhance the watershed to ensure accountability.

   Participants clarified the difference between standards and provisions or guidelines, with the understanding that a standard is specific and prescriptive (e.g., activity must be 100 feet from a stream), whereas a provision or guideline requires that an issue be addressed while allowing some flexibility in how it is addressed (e.g., protect the riparian zone). Still others noted the need for at least minimum standards for ensuring watershed health. Generally, participants noted that standards and provisions should be outcome-based; there needs to be a process whereby standards/guidelines could be revised if there were unintended consequences on the watershed; and there should be mechanisms to allow for iterative input from a diversity of non-governmental stakeholders in the development of standards.

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

   There was a lot of concurrence around the general notion that a key component of the rule should be protection and enhancement of water resources because water provides a foundational reflection of landscape health. There was less

concurrence about how exactly to incorporate this into the rule, although there seemed be support for some kind of accountability for forests to protect and enhance water resources balanced with the need for flexibility.

A specific suggestion was for the rule to reference state best management practices (BMPs) that are based on the Clean Water Act. It was also suggested that the process for implementing specific practices should be done in an iterative way to allow input from a broad diversity of stakeholders throughout the process.

5. ***What might be the benefits or drawbacks of the rule requiring adherence to regional scale best management practices?***

This question did not receive specific attention.

D. Diversity of Plants and Animals

1. ***Should the rule provide for diversity by focusing on habitat, populations, species, or a combination of the above? Are there other ways to provide for the diversity of plant and animal species?***

Most participants agreed that providing for plant and animal diversity is important; however, there was a wide range of opinion regarding the best approach on this topic.

The range of opinion included:

- Protect and maintain healthy habitats and sustainable ecosystems, coupled with validation through collecting species specific data – recognizing that maintaining a species is not the same as maintaining ecosystem function. If there are healthy habitats, it was suggested, plant and animal species will thrive. The Forest Service is primarily a habitat management agency. However, some participants noted that there are other factors than habitat which affect species health, and that these also need to be considered.
- Promote biodiversity, and measure it through some sort of biodiversity index, using multiple measures of plant and animal health, including habitats, genetic diversity, physical health, population size, and population dynamics.
- Monitor indicators or "collaboratively derived landscape characteristics" as proxies for a suite of species. However, there was an acknowledgement of the challenges with the use of indicator species in the past.
- Focus on "at-risk" species. The rule would have to define "at-risk" species and/or give guidance to forests for determining which species are meant by this. One approach might be to require managers to determine which species are sensitive to development and destruction within the plan area so they can focus protective measures on those species.

- Identify and protect species that are important to local communities.
- Analyze and reduce stressors in the environment.

Essentially all of the discussions about plan and animal diversity touched on monitoring – and the need for both fine and course filter approaches. The Science Forum dealt with monitoring in great detail. Concern was expressed that the Agency may not have the resources to conduct sufficient monitoring, although the monitoring technology has improved dramatically in recent years and is available at lower costs.

2. ***Should there be a specific standard of protection?***

   The range of opinion can be roughly characterized as having three dimensions for what the rule should say about a standard of protection: stay silent on the issue, specify principles and/or criteria only, or have a prescriptive standard.

   Some thought the new rule should remain silent on this issue because, NFMA already provides enough direction regarding plant and animal diversity.

   The second view was that the rule should include principles and/or criteria for how managers should assess diversity instead of a national standard, i.e., simplicity at the rule level, and flexibility at the forest plan level.

   The third view was that the rule should contain prescriptive language that provides clear, concrete direction regarding a standard of protection so that individual forests and their communities don't get bogged down in trying to make these determinations, and to provide a way to know if the nation is achieving the NFMA goal of diversity. There was no clear convergence about what standard to suggest although many stakeholders noted the challenges of implementing the 1982 rule "viability" standard. Other specific ideas about standards included:
   - Have the language mirror that in the Endangered Species Act.
   - Have a standard be to maintain healthy habitats.

3. ***What, if anything, should the rule say about coordination/protection beyond forest boundaries with regard to plant and animal diversity?***

   Consistently, stakeholders emphasized the need to coordinate and cooperate beyond Forest Service borders for purposes of identifying and protecting critical habitat, migration corridors etc., although it was noted that the rule cannot require other land owners and managers to comply with Forest Service priorities.

There were a number of specific suggestions for what the rule might say about coordination/protection beyond forest boundaries:

- Communicate with other landowners about the planning process in ways that are free of scientific and legal jargon.
- Explicitly state in the rule why coordination across Forest Service boundaries is essential (i.e., given that plants, animals, and ecosystems do not read maps) to reduce concerns that the federal government is trying to take away private land rights.
- Require forests to assess their contribution to plant and animal diversity within the context of a larger landscape/watershed/eco-region.
- Coordinate with other jurisdictions within a region to better monitor and manage wide ranging species.
- Explicitly consider and/or include state level wildlife action plans in the forest planning process.
- Consider replicating approaches such as the Environmental Protection Agency's watershed programs highlighting the interconnectedness of species, and the Northern Forest Plan.
- Include Tribal and community knowledge when gathering data and protecting diversity.
- Take into account the impacts of global climate change on plant and animal diversity.

4. ***At what landscape scale should the Forest Service analyze diversity of plants and animals?***

   Participants in the roundtables and scientists at the Science Forum noted that scale is species dependent. Some species have very small ranges and the scale needed to analyze that population will be similarly small. Large animals may have to be analyzed at scales that cross regions, landscapes and/or multiple forest units. Many suggested that analyses should use a coarse-filter, fine-filter approach or something similar to incorporate the multiple scales among different species.

   Both participants and scientists suggested that collaboration and coordination with other groups and agencies should allow for the sharing of monitoring and data which will be useful in these types of analyses.

5. ***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?***

   Many participants proposed that efforts to sustain populations will have to consider effects beyond Forest Service lands because most species exist across

administrative boundaries. However, there were different perspectives about what the Forest Service should do as a result.

Participants understand that the Forest Service can only control actions on the land it manages; however, many said that the Forest Service should consider conditions beyond its jurisdictional boundaries when making decisions. They also suggested that the Forest Service should coordinate decisions that apply across proximal National Forest units.

Some tools for developing cooperation could include wildlife easements, landscape cooperatives and collaborative groups that involve citizens and public interest groups. Many suggested that the Forest Service should work closely with the US Fish and Wildlife Service to develop complimentary protection strategies.

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

Many roundtable participants and Science Forum presenters proposed that the rule should deal in some way with the risk that changing conditions and will place on species and populations.

Populations may move or relocate due to disturbance or climate change; forests may see an influx of non-native or invasive species. Many suggested that the Forest Service should pursue both active and passive policies to address these changes. Some suggested that the precautionary principle (discussed above) should be used to guide management. Participants noted that both active and passive actions can be pursued under the precautionary principle.

E. Monitoring

1. ***How should monitoring be addressed in a planning rule?***

Monitoring was emphasized throughout the roundtables and at the Science Forum. The overarching sense was that it will be an extremely important component of the rule, but that the Forest Service should not prescribe specific monitoring protocols as they will continue to evolve over time.

Many people said that when it comes to monitoring, the Forest Service has a tendency to over-promises and under-deliver. Specifically, the Forest Service has not done enough monitoring in the past, monitoring is sometimes an after-thought, the data is sometimes not very helpful, and the data that is collected sometimes goes un-used. Nevertheless, many said that monitoring deserves more attention and funding than it currently receives. Most expressed a strong desire to see more and better monitoring – built into plans and projects, so that it becomes a standard part of forest

management. A large number of participants also recognized that there are budgetary constraints, and that not everything can be monitored.

Some participants suggested that the rule designate certain categories of things that all forests need to monitor, including for example: plant and animal diversity, watershed health, water resources, timber resources, recreational use, and economic and social benefits. Others thought that decisions about what to monitor should be made at the local level.

There were also suggestions about what the rule might say about how to conduct monitoring, for example:

- Focus on attributes that can be easily measured and analyzed, and that provide the best insight into forest health.
- Conduct monitoring within appropriate spatial and temporal scales, and using standardized protocols. Monitoring that crosses landscapes or an administrative boundary is critical for the Forest Service to understand what is happening in the greater landscape, watershed or ecosystem.
- Increase the intensity/frequency of monitoring when there is a lot of uncertainty and risk.
- Collaborative or shared monitoring, where the Forest Service partners with other agencies, state and local governments and public-interest groups, could be used to monitor more broadly without increasing the burden on the Forest Service.
- Employ a more robust system for data management, looking across various agencies, institutions and the Forest Service.

Many of the Science Forum presenters commented on the fact that monitoring tools and approaches are being continuously refined and adapted to be cheaper and more efficient. It is important that the Forest Service utilizes new monitoring technology as it becomes available.

A number of participants underscored the importance of making monitoring data available to the public as a way to increase transparency and accountability. The public would like to know when specified thresholds have been exceeded or triggers met. Regular monitoring and reporting can be useful in judging the effectiveness of plans, projects and management actions; it would also help the Forest Service understand whether and how its standards or benchmarks are or are not being met; and, would help inform decision making about which projects to prioritize. Participants also noted that no amount of monitoring will replace good leadership.

F. Ecosystem Services

1. ***Should the Agency include provisions for managing lands for the sustainable delivery of ecosystem services?***

   There were a couple of cross-cutting themes that emerged on this topic. First, managing for healthy ecosystems in general is the primary way to ensure sustainable delivery of ecosystem services. Second, many participants wanted ecosystem services to be more explicitly quantified and valued – although there was no consistent message about how to do this in the context of the planning rule.

   Managing for healthy ecosystems is covered elsewhere in this document. Some of the ideas about quantifying and valuing ecosystem services included:

   - Make sure the definition of ecosystem services includes "traditional" goods and services (e.g., grazing, logging, mineral extraction, etc.) as well as "newer" goods and services (e.g., carbon sinks, recreation, biomass, etc). Include the possible value of carbon sequestration on forests/grasslands that overlay geological formations with the potential for sequestration.
   - Avoid mandating a specific methodology for calculating the value of ecosystem services as there is a still a great deal of variability and uncertainty about valuation approaches.
   - Some suggested that assigning a dollar value to the "newer" services was the best approach for comparing them to more traditional commodities. However, many people suggested that it was better to consider the intrinsic value of these services at the local level. Others suggested that the national value of these services should also be considered.
   - The ecosystem services from individual forests should be considered within the context of the larger landscape or system.
   - Use a systems integration approach.
   - Utilize net present value in the calculations.
   - Use an analysis that is developed in consultation with the public and is understandable to communities.
   - Provide a framework in the rule for dealing with conflicts between the Forest Service and other owners of the subsurface mineral rights.

   Some suggested that the valuation information should help inform decision-making. Some suggested that the rule should require forests to do more than just "consider" such information. There were conflicting views, however, about what that might mean. Depending on their perspective, participants hoped/feared that more explicit valuation of newer, non-traditional services such as recreation and carbon sequestration might further diminish the emphasis on traditional goods like timber and coal. Those who were concerned with this outcome said that historical uses –

and their contribution to local economies - should have an important place in the planning process within the framework of a multiple-use strategy.

G. Contribution to Vibrant Local Economies

1. *Should the planning rule give direction so that plans have conservation and restoration goals that contribute to vibrant rural and national economies?*

   Many participants said that the best way for the Forest Service to contribute to healthy economies is to maintain a focus in the rule on ensuring healthy forest ecosystems. They suggested that healthy ecosystems are better able to provide both traditional economic benefits and ecosystem services better than degraded systems.

   Many noted that the Forest Service does not really have much ability to intentionally influence economies, and should focus instead on the land management business it knows best. Others suggested that the Forest Service needs to elevate the importance of vibrant local economies through effective involvement of and collaboration with representatives of the local communities that are impacted by Forest Service land management plans.

   Participants recognized that the relationship between communities and national forests and grasslands is extremely variable. For example, there are many counties, particularly in the west, that are heavily influenced by and reliant upon forest management because a large percentage of the land base is under Forest Service or other public jurisdictions. Many other communities are only minimally impacted by their local forest or grassland. The rule needs to be cognizant of this variability.

2. *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?*

   Generally, participants often assumed the rule and/or the National Environmental Policy Act would require that the social and economic impacts of forest plans would be considered in addition to the environmental impacts, through interdisciplinary assessments as well as other mechanisms. Many suggested that national guidance should establish a consistent framework for forests to evaluate socio-economic impacts. However, this framework should be flexible enough for communities and forests to work together and adapt it to their area and needs.

   Participants generally suggested that assessments should be used to help inform decision-making and set priorities. A variety of participants said that the rule should require forests to do more than just consider these issues, but they had a hard time expressing exactly what standard should be articulated in the rule. A common view

expressed was that stakeholders should be able to work with and "own" the assessments or they will not support decisions based upon them. Following is a sampling of specific suggestions about socio-economic assessments and priority setting:

- Use a systems integration approach.
- Not everything needs to be quantified.
- Provide guidance about how to establish consistent baselines across the forest system.
- Assessments should be open, collaborative, and easy-to-use.
- Assessments should include data from a variety of sources including local communities and Tribal governments.
- The rule should include a comprehensive list of ecosystem services, examples on how to include them in an assessment, and a prioritization framework.
- Assessments could include a review of local economic development and tourism plans to get a sense of the expected future of a community.
- Include an inventory and/or baseline of existing resources—cultural, ecological, etc.
- Ecological, environmental, and social assessments should have equal weight;
- Priority setting should take into account resource availability and sustainability.
- The value of ecosystem services should be considered during forest plan development, but should not be a primary driver of plan outputs to generate economic returns versus environmental concerns.

H. Use and Enjoyment of NFS Lands

1. ***What should the rule say about recreation?***

There was broad convergence that the rule should reflect recreation as a core value with varying views about how this core value should be reconciled with other core values and legal requirements. In general, participants said the planning rule should set broad objectives for recreation. The rule should identify analytical, assessment, and evaluation tools (such as adaptive management) to empower decision makers at the local level to make specific land use / recreation decisions.

A few specific suggestions were that the rule should direct forests to:

- Conduct recreation needs assessments.
- Address travel management within the forest planning process.
- Provide for more consistency (e.g., national trail classification system).
- Promote the use of volunteerism
- Promote the engagement of youth.
- Balance competing recreational uses through iterative, open, collaborative processes, perhaps involving forest level advisory groups.

2. ***What should the planning rule say about suitable uses?***

   The term "suitable uses" was not used as frequently as the term "sustainable recreation." Many participants said the rule should include a requirement for forest plans to support "sustainable recreation," without going so far as to specify what that would mean in specific locations.

   Participants widely agreed that allowed recreational uses should be determined at the local level. In doing so, the Forest Service should consider both traditional (such as historic, cultural and indigenous) and potential new uses on land, air and water. The analysis of what constitutes a "suitable use"—or sustainable recreation – should take into account and mitigate against environmental impacts on vegetation, soil, water, etc.

   Many said that to ensure sustainable recreation the rule should require plans to consciously design for recreation by identifying niches and suitable uses; and that implementation of plans should include active management of recreation. Some noted that with integrated analysis and proactive management of carrying capacity, recreational uses should not be seen as incompatible with ecosystem services.

   Participants also suggested that the rule should:
   - Assess recreational carrying capacity;
   - Be able to incorporate new recreational uses (e.g., mountain biking which really did not exist as a recreational use in 1982);
   - Provide equity/balance for different kinds of uses (motorized and non-motorized, hunters, horseback riders, etc.),
   - Consider uses across seasons; and
   - Promote experimentation in management practices.

3. ***What should the planning rule say about places of interest?***

   Most of the discussion about areas of special interest focused on wilderness areas; however, there was no general convergence on whether and how the planning rule should address these areas.

   Some participants said that the planning rule should help ensure that wilderness areas be left as natural as possible. They suggested limiting visitor access to these areas. Others agreed that wilderness areas should remain in a very natural state, but they suggested that hiking access should be allowed.

   There were a number of participants that believed that mountain biking was a very non-intensive and non-intrusive form of recreation that should be allowed in wilderness areas.

Others felt that, if controlled properly, some forms of motorized recreation could be allowed in wilderness areas. They suggested that with proper education and management, motorized users could become stewards of wilderness areas.

There was also some discussion about heritage trails and heritage sites. It was suggested that the Forest Service should actively support cross-jurisdictional actions that protect and promote these resources.

4. ***What should the planning rule say about access, visitor facilities and services?***

A number of stakeholders suggested that decisions about recreational access should be made through a collaborative decision-making process at the local level. And, as noted above, there was broad agreement that the planning rule should direct forest plans to be coordinated with forest travel management plans. There was very little discussion of the topics of visitor facilities and services.

A small number of participants suggested that the planning rule could help to achieve greater consistency in recreational management across the country. The primary example of this was to use the rule as a means to develop a national trail classification system that all forests should use.

There was also a lot of discussion that focused on how forest users can engage with the forests. Generally, participants thought that forest users, with the proper education, can be reliable stewards of forest health. Attendees suggested that the Forest Service should actively work to educate forest users.

Education could be done in a multitude of different ways, from forest seminars to trail signs. Participants suggested that education efforts should focus efforts on:

- Teaching users the best way to recreate in the forest;
- Helping users teach their friends and family how to treat the forest better;
- Promoting the use of volunteerism; and
- Promoting the engagement of youth.

Many stakeholders acknowledged the need to include and balance interests from all levels. Some noted the importance of educating national stakeholders about local realities, especially when they engage mid-way in forest level planning process. Others commented on the overall need to have an educated public for any collaborative process to work effectively.

III. PROCESS TOPICS

I. Changing Conditions

1. ***How should the rule allow for flexibility in land management plans to adapt to changing science, information or conditions?***

   Flexibility

   Participants ranged widely in their views about flexibility in the planning process. On one end of the spectrum, some said the term "flexibility" is code for "gut NEPA", and believe the current forest planning process is too flexible. Stakeholders on the other end of the spectrum said the current planning process is too prescriptive and complicated, leading to delays and frustration.

   In spite of this divergence, a few ideas emerged that might help bridge these gaps, including:

   - Consider a tiered, segmented approach to planning with differing amounts of flexibility for different resources, level of risk, etc., but within a clearly defined national-level framework.
   - Require that plans and projects be developed more cooperatively and with both community and scientific involvement – thereby building the buy-in and accountability that are pre-requisites for many stakeholders to trust the Forest Service with flexibility. Move away from the "decide, announce, defend" paradigm.

   Amendment Process

   In regard to the amendment process, there was a consistent message about the need for plans to be more easily updated to keep pace with changing conditions.

   A few specific suggestions for what the rule might say about the amendment process included:

   - Require triggers for updating plans, but specify that the actual triggers be defined at the local level.
   - Specify regular intervals for updating plans.
   - Include a petition process for stakeholders to be able to initiate an update when they think there is a problem to be addressed.
   - Institutionalize a "cooling off period", during which no changes to a plan can occur for a specified length of time, so that there is an opportunity to see how things evolve.

J. Plan Revision Process

Many participants supported making planning an ongoing process and plans living documents. Specifically, they suggested the process should be iterative, collaborative, and self-correcting based on new data - more of an on-going, rolling effort as opposed to a large undertaking every fifteen years.

1. ***Is it more important to get a plan right (and take a long time to produce) or to be able to update (amend) the plan quickly based on new information?***

   A wide diversity of participants favor making plans living documents that are developed and revised through a collaborative process. This would result in formal revisions being less cumbersome.

   Some acknowledged that it is hard to engage a community on an on-going basis, but others stated that if the Forest Service is truly working through an open, transparent process and uses the input of diverse stakeholders, people will remain engaged. The NFMA requirement of revisions every 15 years should not preclude small changes between major revisions through adaptive planning or adaptive governance.

2. ***What would you like to see as ways to streamline the plan revision process? How might the revision process be improved so to keep people engaged?***

   A variety of suggestions were made regarding how to improve the revision process so that stakeholders remain engaged. Foremost, stakeholder input should, to the extent possible, be strongly considered and incorporated into planning and project decisions. Such an approach can help in the development of a shared vision; produce buy-in from participants; foster a sense of ownership in plans; help ensure that relevant topics are addressed and acceptable solutions proposed; and, ultimately lead to more useful and legally robust forest plans.

   Some suggested that the Forest Service should adopt a tiered planning approach (national, regional, and forest) to help streamline the process and allow for coordination from the national level and site-specific input from the local level.

   Other suggestions include:
   - Forests should endeavor to identify where there is agreement among stakeholders about forest planning issues so more time and energy can be devoted to controversial issues.
   - Consider a mandatory timeline to ensure that planning processes stay focused.
   - Specify when in the planning process to employ both formal and informal collaboration so as to better align plan development and NEPA requirements.

3. *Are there suggestions you can offer for how to craft a rule that is simple, straight forward, and not too expensive to implement? What are they?*

   Several participants suggested that the Forest Service should make better use of data from other entities when possible, as opposed to generating its own. In addition, many suggested that the role of cooperating agencies could be expanded in the planning process, and that the rule should provide guidelines for how and when inter- and intra-agency collaboration and coordination should occur. Some said they had less trust in some of cooperating agencies in than they do the Forest Service.

4. *There is a backlog of revisions right now across the country – how should plan revisions be scheduled to meet any new requirements?*

   This issue was not directly addressed.

5. *Should the entire forest plan be redone in a plan revision, or can parts be retained from the previous plan? What parts could stay and what would have be started all over?*

   Many participants suggested that the on-going planning processes should focus on updating those parts of plans that have become outdated in an iterative, rolling fashion.

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

   To the extent this topic was addressed, it has been summarized under the uncertainty section of this document.

K. Planning Update (Amendment) Cycle

As noted above, a diversity of participants recommended that plans be "living documents" that could be amended fairly quickly, i.e., plans should not stay static for fifteen years between revisions. They should be updated as needed. As discussed elsewhere in the document, there was a strong emphasis on monitoring in order to understand the changing nature of the forests and allow for more responsive amendments.

1. *Should it be easier to amend a plan, so amendments can be done more frequently? Why or why not? Any thoughts how this might be done?*

   Most participants favored making the amendment process easier as long as there are sufficient controls to ensure accountability. One specific suggestion was to set

a high bar for amendments during the first year or two of a plan's life to give it a chance to work.

Suggestions for making the amendment process easier included:

- Consider implementing sector planning. Sectors were generally defined by participants as the forest actions surrounding an action, activity or natural resource (such as grazing, logging or water). There could be a master forest plan would give guidelines for how to develop subsequent plans for each sector. Sector plans could be updated more or less frequently than the forest plan. Sectors where management actions are out of sync with forest goals and priorities should be updated before other sectors. Thresholds for revision and/or a public petition process could trigger a sector plan revision. All sector plans could be examined after a certain amount of time.
- Designate some parts of a plan to be "permanent" between revisions, and other sections as open to amendments.
- Allow amendments after catastrophic events (such as a fire) to be streamlined so that new management approaches can be put in place more rapidly and therefore be more effective.

2. ***How often should we evaluate if the plan is working?***

Generally, participants recommended an iterative, rolling process for evaluating the effectiveness of plans and/or an evaluation and updating that takes place every five years, but not re-write the plan every time.

3. ***What should the rule say about when a plan has to be amended or revised?***

Many participants thought that plan amendments and revisions should be tied to changing conditions, so that plan updates are focused on real needs rather than the entire plan.

Specific suggestions included:

- Require forests to set thresholds and/or triggers for amendments and/or revisions. Once a threshold is crossed, the plan must be revisited to see if action is necessary.
- Specify when and how often critical parts of plans will be reviewed or revised.
- Base amendments/revisions on benchmarking and how successfully the plan is at meeting the marks.

4. ***Should a planning rule outline how to do adaptive management? Why? How?***

A wide diversity of participants encouraged the Forest Service to incorporate adaptive management concepts, or practices that allow forests to respond to changing conditions, into the rule. However, approaches on how to do this varied.

At a minimum, there should be a way for forest plans to incorporate new information as it becomes available. Many stakeholders believe the rule should require a more rigorous version of "adaptive management." However, many expressed concern about the lack of resources for monitoring and the failure to ensure feedback loops between monitoring results and management choices – both of which are essential to an adaptive approach. The consequence of trying to implement adaptive management without the necessary resources and steps could be additional litigation and delays.

Many suggested that the rule should incorporate a structured framework for incorporating adaptive management with clear approaches for reducing uncertainty, analyzing and reducing risks, and addressing unforeseen changes. Forests should be monitored consistently for many characteristics (plants, animals, temperature, precipitation, fire, variability, etc.) This data would be analyzed for trends that emerge beyond natural variability. The Forest Service could then implement different management approaches to address these changes and help achieve desired conditions spelled out in a plan. There should be clearly defined desired outcomes in order to determine whether or not management practices are, in fact, making progress toward outcomes.

Some thought that rule could foster accountability by requiring plans to include triggers for management actions based on the monitoring results. The specifics could be outlined in forest plans. The rule could set rules or give guidance on how to develop these specifics.

Many noted that if adaptive management is used, there is a need to establish clear guidance in the rule about how to utilize an adaptive approach for determining when and under what conditions amendments to forest plans should be made. The planning rule should make the link between monitoring, desired outcomes, key indicators, and triggers for forest plan amendments—i.e., the process of adaptively managing in the face of changing conditions.

A number thought that the public should have the opportunity to engage in adaptive management processes. A collaborative group (possibly a FACA committee) that is very involved and meets regularly can help ensure that all issues are thoroughly considered and can help inform management decisions that are more robust and withstand judicial scrutiny.

Finally, some suggested that the Forest Service could use a tiered approach to adaptive management, in that low levels of rigor are appropriate in some aspects of a forest plan, and higher levels or rigor are important in other aspects.

5. ***How can a new planning rule appropriately build in the flexibility land managers will need to adapt to changing science, information or conditions?***

   Many participants said the planning rule needs to encourage the utilization of the best, most current science while allowing flexibility as science evolves. However, as this report details in the section focusing on the role of science, many acknowledged the challenges inherent in trying to specify what constitutes the "best science".

   In general, recommendations focused on opening up the planning process, including more consistent evaluation at a range of scales, developing measurable objectives, monitoring towards objectives, establishing triggers for revision, and making small changes to forest plans between major revisions. Many suggested that the Forest Service should keep the parts of forest plans that work intact while revising only the pieces which need to be addressed.

6. ***What mechanisms should be used to incorporate new data?***

   Although the term mechanism was not routinely used by participants, many mentioned the value of sharing and analyzing data through a collaborative process to promote more understanding and buy-in. Many participants discussed the importance of recognizing and including information from Native American and community perspectives as well as from more traditional "scientific" sources.

   For example, communities and scientists from diverse perspectives could work together to determine what type of data needs to be collected, how it should be collected, and what the results might mean.

7. ***Do you know of any successful adaptive management regimes that can inform our process?***

   Participants noted that the BLM is using adaptive management processes in many of its planning efforts.

L. Review and Appeal Processes

1. ***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?***

   Across all collaboration events participants expressed a sense of frustration with the current appeals process. It was too easy, many said, to hold up forest plans with appeals. Others said that the appeals process was too long and cumbersome,

and that the way appeals are currently processed is not independent enough to ensure fair resolution.

Many participants suggested that because people sensed the appeals process was broken, they were more likely to take litigious action, a key factor that has led to increased contentiousness around forest planning. There were a variety of suggestions for how to improve the appeals process:

- Appeals should only delay implementation of the contested portion of a plan; uncontested parts of the plan should be able to be implemented while an appeal is underway.
- Appeals decisions should only be made by the Regional Office or the Washington Office. Many felt that Forest Supervisors are too directly involved in the planning process to be independent enough to objectively evaluate appeals.
- Place a time-limit on appeals.
- Establish criteria for what constitutes a valid appeal, for example some level of scientific backing or other evidence requirements. Appeals that fall short of these criteria would not be allowed to proceed and hold litigants financially liable for court costs if their lawsuits are deemed "frivolous".
- Involve stakeholders early and often throughout the planning process in order to better identify and respond to potential problems before they turn into appeals. Some suggested a pre-implementation appeals process for involved stakeholders.

Some participants also indicated that they would support a pre-decisional objection process as long as it was designed in line with the principles outlined above.

M. Forest Planning Compliance with the National Environmental Policy Act of 1969

1. *What is the range of options for fully complying with the National Environmental Policy Act (NEPA) during the plan development, amendment, or revision?*

Nearly all participants said forest planning should be subject to NEPA requirements. Many said that it is essential to do a full EIS. Participants stressed the need for NEPA alternatives to be realistic. A common suggestion was to better increase collaboration in the NEPA process through both formal and informal channels.

Some specific suggestions included:

- Land management planning should entail a collaborative process in which NFMA provides the framework for defining common ground and NEPA to analyze proposed actions. A collaborative process can help in the development of a shared vision; produce buy-in from participants; foster a sense of

ownership in plans; help ensure that relevant topics are addressed and relevant solutions are proposed; and, ultimately lead to more useful and legally robust forest plans.

- The planning process should be designed to work within the budget constraints on the Forest Service.
- Cooperating agencies in the planning process should have roles that go beyond just reviewing draft documents. They could help resolve big issues and smooth out the process.
- Forests should endeavor to identify where there is agreement among stakeholders about forest planning issues so more time and energy can be devoted to controversial issues.

2. ***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?***

   Participants recognized that planning is a complex process. They suggested that public understanding can be improved through innovative approaches for collecting and reporting data such as standardized reporting requirements, requiring EIS summaries, combining EIS analysis across multiple forests, or ongoing analysis. Many noted that with greater public understanding, the Forest Service may be able to decrease the amount of time associated with NEPA requirements.

   Some specific suggestions included:

   - The rule should provide clear and unambiguous guidance to forest planners about the steps and requirements in the planning process, including for example "check lists" of issues that have to be considered. However, forests should decide how to address the issues.
   - The data necessary to assess land management decisions should be collected and available on a consistent basis. A system of triggers and thresholds, informed by regular monitoring of ecosystem indicators, will allow for appropriate management changes when necessary.
   - Utilize scoping and pre-scoping in the NEPA process to inform the development of draft plan proposals. If the input from the scoping processes is used in a transparent manner, there will be more public buy-in.
   - To cut down on redundancy, there should be a clearer, more stream-lined connection between upper level Forest Service strategic planning and planning at the forest level.
   - The planning process should be "tiered" appropriately; there will be different kinds of analysis and levels of certainty associated with plans at the forest, regional, and national levels.

- The Forest Service needs to strike a balance between specificity and flexibility. Specificity provides accountability, but also makes the process more complex and more open to litigation. On the other hand, flexibility cannot be open-ended. The rule should give structured guidance on how to respond to change conditions.
- The rule should provide higher-level guidance, and an accompanying manual should provide more details and specific examples of how the rule could be implemented.

N. Rulemaking Compliance with NEPA

1. ***With regard to the development of the planning rule itself, how should the Agency describe and analyze the environmental effects in the environmental impact statement of the proposed rule?***

   Participants noted that since most people are accustomed to performing NEPA analysis on plans or projects, where direct actions are taken and direct effects are measurable, it is very difficult to envision NEPA analysis for the planning rule revision, which will not direct any specific on-the-ground actions or projects. Nevertheless, there were a couple of ways suggested for how the rule might approach the NEPA analysis.

   First, since different management actions will have general environmental impacts, the Forest Service could look at examples of forests where the management direction proposed in the rule is already taking place and examine the general effects of those management strategies. A qualitative analysis of the expected outcomes of the direction given in the planning rule could be the basis of a NEPA analysis. The expected effects of management strategies could be contrasted against the baseline of plans developed under the 1982 rules. NEPA alternatives could be framed as the predicted outcomes of pursuing one management direction versus others.

   A second approach could be to contrast the kind of flexibility that is inherent under the 1982 rule for conservation or commodities extraction versus a less flexible approach where there is more clear direction.

   Some participants also suggested that the Forest Service could produce an analysis of litigation on previous rules and forest plans, and an explanation of what is proposed in the current rule to address the issues that were litigated.

O. Collaboration and Coordination

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

   Participants discussed the need for a well defined decision space, i.e., clarity about the role of collaboration within the decision making process and about who has decision making authority. When stakeholders invest in collaboration they need to clearly understand the limits of their input. Ambiguity can lead to distrust and a sense of disempowerment, particularly when stakeholder input seems to be discounted.

   Participants recognized that there are many stakeholders involved in these issues and all should have the opportunity to be engaged in the collaboration process. Many participants stressed the need to involve more diversity and lower the barriers of entry for disadvantaged stakeholders.

   Some specific suggestions relative to this topic included:

   - It is important to understand the legal limits and obligations of the Forest Service. It is also important to define the extent to which input from collaborative groups can and will be used in decision-making processes.
   - Laws such as the National Historic Preservation Act, Clean Air Act, Clean Water Act and the Endangered Species Act already dictate certain actions that need to happen in forests. It is helpful for stakeholders to be aware of the legal context for forest management.
   - Collaboration should focus on the aspects of forest management where stakeholder input can actually make a difference. It is not useful to have stakeholders discuss options for things they cannot change.
   - For plan revisions and amendments, it will be important to define what is working and should not change, as well as addressing new needs that any collaborative process should focus on.
   - Ongoing monitoring and readily available data will help stakeholders understand where their attention should be focused. Data and collaboration lead to adaptive governance.
   - It is important to identify and intentionally reach out to the important groups and communities that need to be involved in the planning process.
   - Sometimes the culture of the Forest Service resists input from specific groups or communities. All groups need to have a chance to participate in the collaborative process.
   - Some groups do not have the resources or time to attend meetings, including for example some Tribes, cultural groups, community-based groups and forest workers. Resources should be available to support participation.

- It is important to involve youth; they have a lot to say. However, youth may not feel comfortable attending meetings unless they have been specifically invited.
- There should be deference to local stakeholders who understand and are directly affected by forest plans; however, there should be opportunities for non-local forest users to engage and offer feedback as well.
- Constant communication with stakeholders and efforts to connect forest users to the land will keep people excited and involved in the process.

2. ***Is efficiency and transparency important to you? What other public involvement principles would work for you?***

   Participants expressed a strong desire for efficiency and transparency in the planning process. They did note that these two ideals are often difficult to reconcile, and are not usually hallmarks of the way that government functions. It will be important to take these difficulties into account when trying to build these ideals into the planning process.

   Some specific suggestions included:
   - Striving for efficiency may result in going too fast. It is more important to conduct planning process collectively and collaboratively than to do them quickly. History tells us that trying to go too fast can result in failure.
   - A transparent process will allow stakeholders to see how a decision is made and the justification is for the decision.
   - Efficiency needs to extend beyond just the planning process; it should also apply to plan implementation. Litigation during implementation can greatly slow the management process.

3. ***What would be some effective and efficient ways for people to provide input and comments on the proposed plans?***

   Participants highlighted the difference between collaboration and input. Many expressed frustration with traditional input mechanisms, where input was gathered but not necessarily used – a feeling exacerbated by non-transparent processes. They expressed the desire for real collaboration and transparency as to how their feedback is being used. Some participants suggested that the rule incorporate the concept of adaptive governance – which could entail stakeholders collaboratively identifying needs, problems, and opportunities, collaboratively creating solutions to those needs and problems, collaboratively implementing those solutions, and collaboratively monitoring those solutions in a continuous manner to feed back into the system.

Specific suggestions included:

- Collaboration should be tiered and implemented at various levels (national, regional, forest, project).
- Forests should collaborate with stakeholders in defining the forest vision and desired future conditions.
- Having stakeholders work together in the forest planning process can be a way to build mutual trust and respect. Stakeholder involvement, done well, can also lead to greater acceptance of outcomes, even when not all interests are accommodated.
- There is a difference between input and influence. Stakeholders are interested in influencing the process. Stakeholders are more likely to feel as though they are influencing the process if they can be involved in scoping and in collaborative groups.
- If input is gathered, it needs to be utilized. For example, the Forest Service blog looks like it is not being used. People need to understand the role of their input before they will engage.
- There should be efforts to collect meaningful input throughout the planning process, including during the initial stages because some decisions are made early.
- Traditionally, it seems that in most cases the Forest Service has conducted only the minimum legal amount of public involvement and collaboration. This planning rule process indicates that the Forest Service is ready to engage in collaboration and adaptive governance above and beyond what has happening previously. This process should be institutionalized for further planning rule processes and for future planning purposes.
- There also needs to be inter-agency collaboration with other entities that have decision-making power and resources that can be leveraged to achieve forest land management objectives.
- Collaboration is an iterative process that can feed into adaptive management and restoration over time.
- Elected officials should have a prominent role in any collaborative effort because of their unique role representing other stakeholders.
- Because local governments are exempt from FACA, they could be used to convene advisory committees to help guide forest planning.

P. "All-lands" Approach

There was considerable, but not universal, interest in and/or enthusiasm for the concept of an "all lands" approach, depending on how it is defined and implemented. Many suggested the term needs more definition. Those who were more skeptical suggested that a vague requirement for forests to consider things outside of their boundaries could be perceived as overreaching and, as a result, open up plans to legal challenges.

It was also noted that the planning rule is not the only or even the primary means for implementing this concept. Many suggested that this concept is broader than forest planning, and that effective implementation would require changes throughout the Agency through various policies and directives – not just through the planning rule. If the Forest Service wants to employ an all lands approach, there needs to be vocal support from the Secretary and the Chief.

Many noted that the concept of an all lands approach is connected to land management planning in terms of the need for effective communication and collaboration between the Forest Service and both its immediate neighbors and land owners in the surrounding region / landscape. The Forest Service should consider the types of interactions it wants beyond its boundaries and build an overall framework to promote those interactions. Many suggested that the Forest Service should promote a spirit of collaboration throughout the agency. This spirit could be advanced in the planning rule, but further training and agency support will be required to make it a reality.

1. ***To what extent and how should the Agency collaborate/coordinate with adjacent landowners and partnerships?***

   Participants identified three potential paradigms for an all-lands approach: (1) contextual, where Forest Service lands are managed with an understanding of their unique role in the greater landscape, (2) cooperative and complementary, where the Forest Service works with surrounding land owners to enhance the likelihood of compatible and complementary uses, and (3) reactionary, where Forest Service lands are managed to compensate for or react to land management practices occurring beyond their boundaries over which they do not have control or authority. These are not mutually exclusive approaches.

   Participants noted that boundaries are permeable and that an "all lands" approach could be useful for achieving many different management objectives, including protecting at-risk species, creating resilient ecosystems, protecting watersheds, historic preservation, supporting trails that cross jurisdictions, and providing recreational access.

   They also said that an "all lands approach" is already being employed in some contexts. For example, coordination already occurs with respect to wildlife habitat and wildfire. A few specific suggestions for coordinating forest management with exterior circumstances included:
   - Adjust and adapt coordination to take into account rapid development at the urban-forest interface.
   - Plan for commodity extraction and production in conjunction with market analysis to assess demand.

2. ***Should the forest planning process include an evaluation of how land management off the national forest affects national forest resources?***

   This is related to the "contextual" and "reactionary" approaches to land management described above. Many participants agreed that such an evaluation would be very useful; however, they were some concerns about whether or not the Forest Service had the capacity to conduct such an evaluation.

   Data management will be important to the success of an "all lands" approach including any evaluation component. The Forest Service will need to utilize the best data available, and share information with other agencies, academics, and citizens. Some worried that the Forest Service already has difficulty using the data it collects, and that if an "all-lands" approach is implemented, there may not be resources to share and manage data effectively.

3. ***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?***

   Participants broadly agreed that forest plans should be coordinated with other planning and assessment processes.

   This coordination should occur at all levels and with a variety of different processes. Some specific suggestions included:
   - Require forests to work with the states in during plan development and implementation. States have a significant stake in the rule.
   - The rule could require coordination with state, regional, and county agencies that are affected by forest management. Forests should utilize and build upon inter-agency arrangements and planning processes that are already in place.
   - Federal agencies need to collaborate more with one another because there are a lot of shared land management goals across agencies. It is very challenging for state and local governments to try and coordinate with multiple agencies when those agencies are not coordinating with each other. In particular, it is important that the Bureau of Land Management and the Forest Service are working with each other.
   - Consultation and coordination with Tribes will be a key component of any "all lands" approach.

4. ***Should the planning rule require the Agency to start or join efforts to propose landscape goals for large geographical areas that include all ownerships (including National Forest System lands)?***

   There was tension in the discussions around the extent to which an "all lands" approach should be mandated versus encouraged by Forest Service. Some felt that

since the Forest Service has national reach, it was well position to take the lead in developing an "all-lands" approach nationally.

Examples of concerns about a strong Forest Service role included:

- If this concept were to be mandated in the rule, it would appear that the federal government is attempting to regulate state or private lands where it has no jurisdiction; incentives could be a better way to achieve the purposes of an all lands approach.
- An all lands approach could be construed as a way for the Forest Service to avoid meeting requirements specified in the National Forest Management Act – especially with regard to species diversity.
- If an all lands approach is mandated in the planning rule, it may imply that the Forest Service should take the lead on coordinating agencies and landowners. Traditionally, the Department of Interior and specifically National Park Service have served more often as leads in such efforts. A more active role on the part of the Forest Service could be seen by some as over-reaching from Washington DC.

An example of why some participants favored a strong Forest Service role included:

- In some instances it might be appropriate for the Forest Service to assume a lead because of their significant land management responsibility in a region.
- An all lands approach could be a way for the Forest Service to be more accountable for coordinating its land use and land management decisions within the broader landscape.
- An "all lands" approach by the Forest Service in coordination with other land managers could strengthen protection for resources such as national historic sites and interstate trails that have congressionally mandated protection.

5. ***Should plans be required to include a description of the unit's distinctive roles and contributions to the local area, state, region, and nation?***

This is also related to the "contextual" approach discussed above whereby each national forest and grassland would define its specific role, contribution or niche in the context of the broader landscape. While this approach was probably the least controversial of the three approaches described above, there was not universal agreement that all forest plans should be required to include such a description.

Q. Coordination with other Agencies and Governments

1. ***How should plans be coordinated with other agencies and governments?***

Participants strongly suggested that Forest Service planning and management should be closely coordinated with other county, state, federal and tribal

government land management agencies. Many suggested that because the Forest Service oversees a National Forest System and has the benefit of a broad multiple use mandate, it is uniquely positioned to assume a leadership role in coordination and collaboration across agencies.

A few specific suggestions included:

- Recreation access should be supported by coordinating access routes across different jurisdictions.
- Management of roads should be coordinated across federal lands.
- Wildlife corridors should be similarly protected in different jurisdictions.
- Restoration activities should be coordinated when the damaged area is in two different jurisdictions.
- Place a high priority on involving local and county officials in forest planning, and take local and county plans into account. Many supported the cooperating agency framework that is currently in place as a good way to involve local governments.
- Develop better ways to share data and information with other agencies and governments.
- Coordinate with other jurisdictions to protect heritage sites and trails. Tribal input and involvement will be especially important.

R. Local and Regional Differences

1. ***Should the planning rule allow a choice of planning processes in different locations? If so, how? What kinds of provisions would need to be included to guide and evaluate a process choice?***

   Throughout the collaboration, there was a recognition that each forest is unique, and that conditions and concerns vary around the country. Participants generally said that the planning process should allow for the development of plans that best fit local conditions; the rule should provide an outline of the process, but allow forests to build plans that are best suited to their needs.

   There was a lot of support from many stakeholders for collaboration with local stakeholders and governments as the best way to identify planning issues and potential solutions. Suggestions for collaboration mechanisms included: developing local advisory committees (similar to Resource Advisory Committees) and/or "coordinating agency" agreements with local governments. The rule could specify the basic characteristics of such mechanisms.

   Some participants expressed concern that too much local control could result in a loss of accountability for sound management. They recognized that an overly prescriptive rule could impede rather than support forests; however, they wanted

some sort of oversight, national direction, and/or outcome based standards to guide the way that local decisions are made on critical management issues such as:

- Resiliency;
- Landscape connectivity;
- Water supply;
- Water quality;
- Commodity outputs;
- Recreational uses;
- Biodiversity;
- Climate change; and
- Restoration.

S. What is the role of science in the planning process?

1. *If the rule requires the use of "best available science," how should "best available science" be characterized?*

   Stakeholders generally agreed on the imperative to use accurate and up-to-date science in forest service planning, but they struggled with whether and/or how to mandate and define "best available" science. A concern with the term "best available" science was that "best" is highly subjective. A few stakeholders also raised the concern that requiring the use of best available science has the potential to create even more barriers and mistrust if it leads to competing science instead of complementary science. They noted that this is not in keeping with the tone of this rule-writing effort. Some suggested that the rule simply identify the characteristics of good science (e.g., objective, peer-reviewed, repeatable, transparent and collaborative, etc.) and/or that it encourage Forests to seek to develop a mutual understanding of data with affected stakeholders

   Many participants were confused by the phrase "latest planning science" in the NOI. They did not know if it referred to decision science or natural resource management science. There also was a divergence of opinion of the value of "latest" science. Some participants observed that latest science doesn't always mean best science. Further, some noted that there is often disagreement among scientists what is latest, and, in any case, the latest science may not be relevant or scalable to the issues being addressed.

2. *What, if anything, should the rule say about the role of science in decision-making? How should science and public participation be integrated or weighted in decision-making? What should the rule say about the relationship?*

   Participants from a diversity of perspectives suggested that science should help inform, but not be the only factor in, forest plan decisions. Many said it is important to involve non-scientists in decision making because many of the issues

and problems in forest planning have social and economic components that cannot be resolved through scientific or technical solutions. There was disagreement about whether or how science could be used to address differences in value judgments.

Specific suggestions about how to incorporate science into decision making included:

- Interdisciplinary Forest Service teams could work with communities to ensure that science is incorporated and communicated in ways that enlighten rather than confuse the decision-making process.
- Integrate science and scientists into the collaborative process. For example, invite scientist to be members of collaborative groups and/or utilize scientists as resources for such groups to build capacity and help them provide more informed input.
- Draw on the expertise of resource managers and resource specialists, local and public knowledge, and indigenous knowledge to help build a shared body of knowledge that includes science – for example, through joint fact finding.

Many noted that science is only one way of knowing, and that forest planning should also accommodate traditional knowledge, the wisdom of Tribal elders, and social and planning science

Finally, a number of participants suggested that scientists should be engaged in the creation, validation, and implementation stages of rule development.

3. ***What should the rule say about decision-making in the face of scientific uncertainty?***

Most participants recognized that uncertainty is inherent in the scientific process. The range of suggestions for decision making in the face of scientific uncertainty included: utilize the precautionary principle; employ adaptive management and/or scenario based planning to evaluate the potential outcomes for a range of actions; and establish collaborative planning frameworks to enable scientist and stakeholders to jointly address uncertainty by devising accountable processes tied to monitoring and adaptive management.

Many noted that better monitoring and data-sharing would allow the Forest Service to deal more intelligently with risk and uncertainty.

IV. PLAN CONTENT

T. Information and Issues

4. *Should the planning rule require a list of issues that must be dealt with in every plan revision? What information do you want to see in a plan?*

A number of participants liked the idea that the rule specify topics/issues that should be addressed in each forest plan. Many thought this was a good way to ensure some measure of consistency nationwide in forest planning. However, some stakeholders thought that doing so could be problematic, fearing that a critical issue, local issue or an issue that develops in the future could be left off the list and therefore not be address. The alternative was for the rule to outline a process for forests to determine which issues/topics to address. Others suggested that if the rule includes a list of issues/topics, it should include a caveat that each forest can choose to address other topics if the need arises.

Many worried that if forest plans become too specific, they will become outdated before they undergo revision. It was suggested that plans should be process documents that outline how the forest will identify management issues, prioritize among them and develop solutions.

There was significant debate as to how prescriptive the planning rule should be in requiring forests to address issues (for example, are plans required to address an issue, or only asked to consider an issue; are there specific standards that are set around topic?). The divergent views on this subject are further characterized in the section dealing with standards and guidelines.

Possible issues that the planning rule could require forests to address included:

- Resiliency;
- Landscape connectivity;
- Water supply;
- Water quality;
- Recreation (all types);
- Biodiversity;
- Invasive species;
- Climate change;
- Historical change cycles;
- Stressors;
- Restoration;
- Protection of heritage sites;
- Maintenance of heritage trails;
- Contribution to local economies;
- Travel management;

- Education of forest users;
- Collaboration with stakeholders;
- Tribal consultation and collaboration; and
- Collaboration and coordination with state and local governments and other federal agencies.

U. Shared Vision

1. ***Should the planning rule support the creation of a shared vision for each planning area and, if so, how?***

   To the extent people responded to this question, most supported the idea of a shared vision of the national forest system in the preamble of the rule, as well as a shared vision of the purpose, priorities and niche of each unit at the forest level. However, there was wide divergence in what they thought the vision should be.

   Specific ideas included:
   - Maximize ecological sustainability;
   - Maximize human uses in the forest;
   - Maximize traditional economic uses (such as timber, coal and oil and gas);
   - Maximize recreational uses;
   - Maximize non-motorized recreational uses;
   - Provide habitat for plant and animal species;
   - Protect water resources;
   - Protect ecosystem services; and
   - Promote multiple uses within a framework of sustainability.

   An alternate perspective was that the Multiple Use Sustained Yield Act and NFMA already outline a vision for the national forests and that vision is sufficient.

V. Standards and Guidelines

1. ***Should the new planning rule require standards and guidelines in all plans?***

   There was no consistent message on this question. Participants did recognize that standards could be included in the rule, in plans, or in projects, and that including standards at one level does not exclude developing standards at another. The range of opinion included the following general perspectives:
   1. **Clear standards and guidelines in the rule are essential to ensure healthy forests and consistency nationwide.**
   2. **Specific standards should be developed within each forest plan to ensure accountability, and the rule should merely give guidance on when and how to develop them.**

3. **Plans need to be flexible to allow the Forest Service to address the unique conditions at the local or project level. Standards and guidelines limit the options for flexibility in a forest plan.**

Specific suggestions included:

- If standards are used, they should help Forest Service staff interpret the rules in a consistent manner across the country, make concrete decisions, and be accountable for those decisions.
- Some prefer standards over guidelines, because standards require action. Others noted that guidelines would better allow for plans to account for regional differences.
- The rule should develop standards that are outcome based for resiliency, connectivity of lands, water quality and quantity, local economic development, recreation, biodiversity, climate change, forest stressors and restoration. Plans could develop the specific requirements to meet these outcomes.
- The rule should give guidance on how to best engage in collaboration with stakeholders, including users, adjacent landowners, youth and local, state, and federal governments. However, collaboration and adaptive management cannot allow the Forest Service to sidestep standards or good science.
- Some expressed concern that in the past, funding has been awarded to allow forests to meet standards; many were concerned that without a clear system of standards and guidelines, it would be easier to cut funding that is not directly linked to mandates and/or outcomes.
- Forest plans should not develop specific standards for anything that might change in the fifteen years between plan revisions.
- Standards and guidelines should be consistent across a landscape or eco-region.

W. Scale

1. ***Are there any elements in a plan that should be dealt with at a scale larger than a national forest or grassland unit? (e.g., large watershed, landscape, multi-unit, state, region, or nation)***

Participants in the roundtables and presenters in the Science Forum both discussed the need for the Forest Service to address issues of scale. Many issues, they noted, occur at scales that are different than the size of a national forest. They suggested that the planning rule should allow forests to be flexible enough that they can approach forest management from a variety of different scales. The scale at which each issue is addressed would be dependent on the nature of the issues and /or specifics of the problem at hand. For issues that are national in scope, they suggested that a clear directive and strategy from the Washington Office could be used to coordinate actions across forests.

Some issues may be more localized within a forest. To address these, the planning rule would need to allow forest managers to think about and respond to issues at very small scales. Examples of this may include small animal habitats, mine restoration sites or industrial locations.

Similarly, there are many issues that exist at scales much larger than an individual forest. The majority of the discussions on scale focused on these types of issues. Participants suggested that these issues should be addressed at large scales:

- Plant and animal habitats;
- Restoration;
- Watershed protection;
- Recreational access;
- Heritage sites; and
- Climate Change[1].

For example, many water quality and quantity issues would require management decisions that are based on what is happening in the watershed. Attempts to protect plant and animal habitats would have to extend to the breadth of the habitat. Heritage sites and recreational access would need to be protected at the scales at which they occur.

Climate Change posed some unique issues and challenges. Many noted that because climate change is global, some of the response steps taken in national forests (such as efforts to manage forest ecosystems as carbon sinks) should be coordinated at a national level. However, some participants noted that the effects of climate change (such as changes in precipitation or seasonal cycles) may be local or regional, and forests need to be able to customize their responses to changes in local phenomena.

At more local and regional scales, participants suggested a number of options for coordination and collaboration with local landowners and stakeholders that could help confront issues of scale. Collaborative groups, similar to BLM Resource Advisory Committees, could be used to develop trust and partnerships among local stakeholders. Coordinating Agency agreements were seen as a good way to develop relationships with state and local governments and federal agencies and could be used to coordinate management practices across a landscape or a watershed. Some also suggested that other partner agreements, such as conservation easements or land cooperatives could be utilized to build relationships with private landowners that could help extend land management to the appropriate scales.

[1] Many of these topics are addressed in more detail in other sections of this report. This section focuses specifically on the components of these topics related to issues of scale.

Some participants noted that as the Forest Service deals with issues of scale, it is important to remember that the Agency's authority only extends within its jurisdictional boundaries. While it is appropriate to look outside of forest boundaries and form partnerships that can lead to complementary management, forests should not avoid decisions that would seem to require actions on adjacent lands. Some warned that even the appearance of this could cause a backlash in some local communities.

V. Appendix A: URL Links to Event Summaries

National Events

Roundtables

- First National Roundtable: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5151736.pdf
- Second National Roundtable: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5158019.pdf
- Third National Roundtable: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5165922.pdf

Science Forum

- Science Forum Summary: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5150104.pdf

Regional Events

Region One

- Billings, Montana: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5154759.pdf
- Coeur D'Alene, Idaho: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5154760.pdf
- Missoula, Montana: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5152284.pdf

Region Two

- Lakewood, Colorado: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5156885.pdf
- Cody, Wyoming: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5156886.pdf
- Cheyenne, Wyoming: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5156887.pdf
- Laramie, Wyoming: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5156884.pdf
- Rapid City, South Dakota: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5156883.pdf
- Sheridan, Wyoming: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5156882.pdf

Region Three

- Region Three Summary: http://www.fs.fed.us/r3/planningrule/summary/summary-report.pdf

Region Four

- Region Four Summary: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5155488.pdf

Region Five

- Bishop, California: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5154761.pdf
- Redding, California: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5154762.pdf
- Sacramento, California: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5154763.pdf
- San Bernardino, California: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5154764.pdf

Region Six

- Portland, Oregon: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5154765.pdf

Region Eight

- Atlanta, Georgia: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5155330.pdf

Region Nine

- Chicago, Illinois: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5162148.pdf

Region Ten

- Juneau, Alaska: http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5155497.pdf