

**National Advisory
Committee for
Implementation of the
National Forest System
Land Management
Planning Rule**

- Mike Anderson, *The Wilderness Society*
- William Barquin, *Kootenai Tribe of Idaho*
- Susan Jane Brown, *Blue Mountains Forest Partners*
- Robert Cope, *Lemhi County Commissioner, ID (Ret.)*
- Adam Cramer, *Outdoor Alliance*
- Daniel Dessecker, *Ruffed Grouse Society*
- Russ Ehnes, *National Off-Highway Vehicle Conservation Council*
- James Magagna, *Wyoming Stock Growers Association*
- Joan May, *San Miguel County Commissioner, CO*
- Peter Nelson, *Defenders of Wildlife*
- Martin Nie, *University of Montana*
- Candice Price, *Urban American Outdoors*
- Vickie Roberts, *Shelton Roberts Properties*
- Greg Schaefer, *Arch Coal, Inc. (Ret.)*
- Angela Sondena, *Nez Perce Tribe*
- Rodney Stokes, *Michigan Governor's Office (Ret.)*
- Christopher Topik, *The Nature Conservancy*
- Thomas Troxel, *Intermountain Forest Association*
- Ray Vaughan, *Noted Author and Raconteur*
- Lindsay Warness, *Boise Cascade Company*

April 5, 2016

Tom Vilsack
Secretary, Department of Agriculture
1400 Independence Ave., SW
Washington, D.C. 20250

Thomas L. Tidwell
Chief, U.S. Forest Service
1400 Independence Ave., SW
Washington, D.C. 20250-0003

Dear Secretary Vilsack and Chief Tidwell:

The National Advisory Committee for Implementation of the National Forest System Land Management Planning Rule (Committee) supports the 2012 Rule's requirements to provide robust, transparent and balanced public participation opportunities within forest planning. Consequently, in September 2014, the Committee provided recommendations to the draft directives that emphasized the need for strong public and governmental involvement and outreach during each step of the wilderness inventory and evaluation process. Through the subsequent two years of learning and interactions with revision forests, the Committee acknowledges and supports that some forests and regions desire to initiate work on the wilderness inventory before the assessment to help achieve the agency's goal to complete plan revisions within 3-4 years. The attached recommendation clarifies the Committee's support of beginning wilderness inventory work before the assessment, provided that public and governmental involvement and outreach are adequate and with the expectation that the assessment will influence the final inventory, and recommends that the Washington Office provide written guidance to Forest Service planning teams.

Respectfully submitted on behalf of the National Advisory Committee,



Susan Jane Brown
Co-Chair



Rodney Stokes
Co-Chair

**National Advisory Committee for Implementation of the 2012 National
Forest System Land Management Planning Rule
Recommendation: Pre-assessment wilderness inventory**

Problem statement: Need to clarify that wilderness inventory work can begin prior to the start of the Assessment, provided there are adequate opportunities for public and governmental participation.

Issues: Section 14 of the final directives states that wilderness inventories “may begin during or after the assessment using existing information to the extent possible, and must provide opportunities for public and governmental participation.”ⁱ This language could be interpreted to mean that wilderness inventories cannot begin until after the assessment starts. However, that was not the intent of the FACA in its recommendation on this part of the draft directives.

Based on early implementation of the 2012 planning rule and Chapter 70 process, some planners would like to get a head-start on wilderness inventorying to help achieve the agency’s goal to complete plan revisions within 3-4 years. A concern with taking that approach is there may not be adequate opportunity for public and governmental participation, since ordinarily there is no such opportunity prior to the assessment.

Recommendation: Provide written guidance to Forest Service planning teams that wilderness inventory work may begin before the assessment, provided that public and governmental involvement and outreach are adequate and with the expectation that the assessment will influence the final inventory. Adequate involvement and outreach should include notification to the public and other governments that the inventory process work is beginning, an explanation of what steps the FS will be taking during the entire wilderness recommendation process, including upfront and continued dialogue regarding management of existing uses in recommended wilderness areas, and opportunities for the public and other governments to provide meaningful input and dialogue with the FS regarding the information and the process. This recommendation is intended to manage expectations and avoid disputes at the end of the planning process.

ⁱ The directives state: “Before the Responsible Official invites comments on the proposed plan, an inventory and evaluation is required for lands that may be suitable for inclusion in the National Wilderness Preservation System (see FSH 1909.12, ch. 70), and an inventory of the eligibility of rivers for inclusion in the Wild, and Scenic Rivers System is required (see FSH 1909.12, ch. 80). **These inventories may begin during or after the assessment using existing information to the extent possible, and must provide opportunities for public and intergovernmental participation.** The inventories may only become final and evaluation of the inventories may only begin after the assessment is complete. The inventories and evaluation are not completed until the final environmental impact statement is published.” (emphasis added)