U.S. Institute for Environmental Conflict Resolution
Udall Foundation

USFS SOUTHERN REGION 8
ROUNDTABLE TO HELP DEVELOP NEW NATIONAL FOREST PLANNING RULE
Friday, April 16, 2010
Atlanta, GA

-- Roundtable Summary --

Prepared for:
USFS Region 8

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MEETING OVERVIEW

On April 16, 2010, the U.S. Forest Service (USFS) Southern Region (Region 8) convened a roundtable meeting in Atlanta, Georgia in order to provide opportunities for public discussion on the development of a new Forest Service Land and Resource Management Planning Rule (planning rule). Additional background information on the planning rule can be found on the Web site (http://www.fs.usda.gov/planningrule).

Participants

In addition to Regional and National Forest Service staff, members of the public participated in the roundtable discussions. These participants represented a wide variety of interests as indicated in the categories below. (See Appendix A: Participants List for a full list or participants and their respective organizations.) USFS made the roundtable available via webcast for all those unable to attend the meeting in person. Additionally, people were able to provide their comments via USDA's blog (http://blogs.usda.gov/usdablogs/planningrule/).

Financial Users
Timber users
Ecotourism

Users
Off-road vehicle
Mountain Bike
Horse Riders
Hiker
Wilderness

Academic
Science

NGOs
Environmental Groups

Other Governmental Entities
Fish and Wildlife Service
State Government

Forest Service Staff
Regional FS staff
National FS staff –including planning staff

OPENING REMARKS

Welcome, purpose of roundtable, policy context (Dr. Jerome Thomas, Deputy Regional Forester)

Dr. Jerome Thomas welcomed participants to the roundtable and discussed the desired outcomes and objectives of the meeting. He conveyed the regrets of the Regional Forester who was not able to attend the conference. Dr. Thomas thanked everyone for assisting in the process of gathering information for the new planning rule. Dr. Thomas provided an overview of why participants are here – to create and implement a stable planning rule – and also discussed the future of the Region 8 Forest Service. The result of this new rule can help address a number of environmental and social challenges facing the country. The rule will provide the framework that national forests and grasslands will use in their processes. It will ultimately help to protect, restore, and sustain National Forests and Grasslands, and will allow the USFS to be more responsive to challenges and better adapt to future needs.

Regional roundtables throughout the country and in Washington, D.C. focus on locally relevant issues in each USFS region. The input from these roundtables will be used to develop a Draft Environmental Impact Statement (EIS) and proposed rule. The collaborative nature of this roundtable shows the Forest Service's renewed commitment to collaboration and transparency.

The scoping period associated with the notice of intent (NOI) has ended and now the USFS is evaluating comments, including those posted to the USFS blog. Summaries of regional meetings will be posted to the Web.

Dr. Thomas described the three objectives for the roundtable meeting:

1. Engage in an exchange of views about approach and content of new National Forest planning rule.
2. Document range of participant views, themes, any areas of agreement and disagreement that may emerge, and any unique characteristics of the Southern Region of which participants would like rule writers to be aware, so that this input can be considered in development of the national planning rule.
3. Enhance relationships between USFS and others with stakes in National Forest planning.

The desired outcome of the roundtable is to gain Region 8 input regarding a new national planning rule. It is important to keep in mind that developing an individual Forest Plan is different than developing a planning rule. USFS is not updating the previous planning rule; they are creating a new rule from the ground up. USFS hopes to build on the strong relationships in the Southern Region to continue working on projects that benefit the region.

Message of appreciation & encouragement (Tom Tidwell, Chief, US Forest Service (by video))

Tom Tidwell expressed his appreciation for everyone's participation in this planning process. The USFS role in this process is to help people sort through their differences and help them to understand the implications of their suggestions.

The participants will approach this process in a spirit of collaboration and openness. Through the discussions, participants need to address certain principles in the rule. The plan will need to address current challenges while being flexible to adapt to future challenges. National Forests and Grassland plans are very important to our country.

National policy context (Larry Hayden, USFS Planning Rule Team Lead)
Larry Hayden provided the policy context for the day's agenda. Roundtable participants are passionate about their National Forests. Mr. Hayden discussed the history of the rule. The Secretary of Agriculture, Tom Vilsack has charged the Forest Service to develop a new planning rule that is more responsive to current forest management challenges. It is important to create a rule that the public feels will be effective and takes into consideration their priorities.

There are no preconceived notions as to what this rule will include. The Secretary of Agriculture and all leaders want this to be an open process. USFS has support from political leadership to ensure the rule incorporates public feedback to be effective. USFS wants to begin revising forest plans in 2012. USFS need a final planning rule and final EIS in November 2011, so drafts are needed by November 2010 (see Attachment 1: timeline).

At the end of the public participation process, USFS will have conducted 34 public meetings and posted all meeting notes (and video clips where possible) to their Web site. It is important that a broad range of stakeholders, including tribes, be involved in the process. USFS will consult with the National Oceanic and Atmospheric Association (NOAA) and the U.S. Fish & Wildlife Service (FWS) early in the process so that when USFS rule team develops the draft, they will be aware. When evaluating participant comments, USFS will need to determine if ideas are legal, within USFS jurisdiction, and feasible. The USDA Under Secretary of Natural Resources and the Environmental will make the final decision on the rule.

The rule team is working on how to keep stakeholders updated between now and when the Final Rule is published.

Mr. Hayden discussed the difference between a process-based rule and a forest plan, which is a place-based management framework. The participants in this meeting may be more used to place-based forest plans that are more substantive. In order to revise these plans, it is necessary to first think about making the process changes to the rule.

In March 2010, USDA convened the Science Forum as part of the planning rule development process. During the forum, scientists discussed the following comments related to the rules:

- Drivers of ecosystems;
- Planning, management, and measuring at the landscape level;
- Plant and animal diversity;
- Social, cultural, and economic dimensions; and
- Science of planning.

One hundred participants attended the first National roundtable to discuss the following issues:

- Watershed health;
- Restoration;
- Climate change;
- Plant and animal diversity;
- Use and enjoyment of National Forest Service lands; and
- Contribution to local, vibrant economies.

Review of Roundtable Agenda and Introductions
Marci DuPraw, facilitator from SRA, reviewed the agenda and "rules of engagement" for the roundtable.

Participants introduced themselves and shared the organization they represented (see Appendix 1: Participants List).

PANEL: Multi-Stakeholder Perspectives on the Implications of Forest Planning Experience in USFS Southern Region & Implications for New Planning Rule

Panelist 1: Paul Arndt, Regional Planner, USFS Region 8
Paul Arndt provided a historical perspective on Forest Service planning in the Southern Region. The first Forest Plans were developed in the late 1980s. Many of these plans have been revised. For example, in 1995, the USFS conducted the Southern Appalachian Assessment (SAA), which was completed in 1996. There were 12 common issues that all of the forest plans included, but each forest plan needs to address a separate set of unique local issues. Mr. Arndt provided examples of the planning processes for a few forests in Region 8.

All forest plans that have been revised to date have been subject to the 1982 regulations. When revising the plans, planners first tried to find the economic values of the forest, but found that the interaction between people cannot be captured in an economic model, so changed to be a more collaborative process. Then they began to focus on the Desired Future Conditions (DCFs) and Objectives Needed to Reach DCFs and to balance the social versus the ecological needs. Plans have both standards and guidelines, and the plans note the difference between the two.

Mr. Arndt also provided some specific information about the state of several forest plans. In March 2010, they released the Notice of Intent to revise the Uwharrie National Forest in Mississippi under the 1982 rule. The George Washington Forest is going through their third round of planning. The next forest plans that will likely follow the new rule are the Nantahala-Pisgah National Forest, Francis Marion National Forest, and National Forests in Texas.

Panelist 2: Jack Swanner, Southern Appalachian Multiple Use Council; North Carolina Forestry Association
Jack Swanner believes in land management and the health of the forests. Mr. Swanner worked at a saw mill and represents the timber industry. This saw mill is no longer in operation and its closure left 80 people unemployed. It is important to consider these local economic impacts.

The forest plan process is too long, so the rule should provide a framework to make this process progress more quickly. The planning process can accommodate everyone's views and opinions and the decision process should reflect stakeholder impact.

Mr. Swanner discussed the importance of working together as a group and being in the Nantahala-Pisgah National Forest during the planning meeting to truly understand the impact of the plans on the forest.

Biomass and biofuels may become new forest industries. The future of these industries and how they will affect National Forest Service lands is unknown, so the rule should have the flexibility to adapt to the emergence of these new industries.

Panelist 3: Ray Vaughan, Wildlaw
Ray Vaughn mentioned one problem is different groups that represent different interests often have not talked to each other nor listened to each other. Mr. Vaughn was involved in the first plan in Alabama in 1986, and public discussion comments were not included in the plan. There is a need to make good management decisions by talking with people who have experience with the land.

Planners need to be out on the land figuring out how things work instead of sitting inside a building. To get things done, need people out in the woods working with nature and working with each other. Mr. Vaughn hopes this planning rule process helps to gain the trust of local stakeholders.

In Alabama, there were a lot of good roundtable discussions and meetings with representation from all interest groups. It is not the rule that makes a good plan; it is the people coming together in the area that make a good plan. In the planning rule, we need something that allows for this type of collaborative process. With this type of rule, there will be less controversy and legal dispute because people would have come to consensus.

All stakeholders want to do more than comment on the plan or tell the USFS what they think about their plan; they want to be able to influence the plan. USFS should not expect that everyone will agree on everything, but important that individuals ideas are reflected in the rule.

Panelist Question and Answer Session

Question 1: Where logging occurs there is concern that valuable natural resources are damaged by logging practices. Do you think anything in the plan can help to address this issue?
Response (Ray Vaughan): We need a flexible process that harnesses collaboration to encourage the development of a place-based plan for each forest.
Response (Jack Swanner): There are examples where places should not be cut for timber, but there are places where trees should be cut.

Question 2: Is this the first time stakeholders have been asked to provide input?
Response (Paul Arndt): This is the first time USFS has sought public input so early in the process. In the past, USFS followed the traditional, structured way, but now they are engaging the public from the beginning of the process.

Question 3: The final plan will go to the U.S. Office of Management and Budget (OMB). What kind of synergies are you anticipating with the current administration? Do we have the economic support to make sure the plan is implemented?
Response (Paul Arndt): We are excited about the level of commitment from the USDA. USFS is working with OBM, the Council on Environmental Quality (CEQ), and others to get administration officials and other federal agencies on board with what is accomplished with the rule.
Response (Larry Hayden): Currently, USFS is drafting a charter that the Under Secretaries of 11 departments would sign to commit to working in a collaborative fashion while this rule is developed. USDA has 30 agencies and each agency gives money. The goal is to pool this money to make sure that projects are funded in a systematic way to contribute to the overall good.

Question 4: In reviewing these plans, we use the term “restoration,” but do not define what were restoring and what we are restoring it to be. We would like to enhance it from today’s state. We use restoration often and it means different things to different people.
Response (All Panelists): Panelists agree that it is necessary to discuss this terminology as a part of the planning rule.

SMALL GROUP DISCUSSION: Priority Participant Suggestions for the New National Planning Rule

During the morning small group discussions, participants were invited to articulate anything they wished about what they would like to see in the new planning rule. A number of comments focused on how the rule should reflect the topics of the draft NOI principles mentioned in the Federal Register and discussed in detail in the afternoon sessions; thus, those comments have been incorporated into the summary of the NOI principles. Participants divided into five small groups to discuss what they hope to see in the new rule. In their small groups, participants introduced themselves. Participants wrote their suggestions for the new rule on sticky notes and then shared them with the group. For any suggestions that were written down but not shared with the group, participants provided these written comments to the roundtable note-takers to incorporate with the spoken comments. A complete list of participant comments can be found in Appendix B.

In response to the question "What is the most important thing you would like to see in the new planning rule," participants identified a number of priority items, which are categorized thematically below.

Guiding Philosophy/Principles

A few of the comments touched on the overarching philosophy or principles that should be reflected in a new planning rule. The group highlighted the need for regional comprehensive planning for natural resources, beyond just the national forests themselves, in order to help meet both ecological and social needs. Some felt that the new rule should emphasize planning at the watershed level by using a landscape-level "all lands" approach. While some attendees seemed to agree that planning should be done within the watershed context, others noted that there should be a nested approach, in which forest plans play a contributory role in landscape-scale and eco-region scaled goals. Others stated that the planning rule should emphasize strategic planning (big picture) over tactical planning (site specific). Others stated that the guiding philosophy of the new rule (and individual forest plans) should clearly reflect science-based ecological restoration. Some thought the planning rule should delegate decision authority to the lowest level possible (e.g., the forest level).

The Forest Service should approach the rule from the perspective of a conservation agency with a responsibility to the people of tomorrow, as much as to the people of today. The rule should require national forests to assess the carrying capacity of their forests before determining the extent to which, and how, to appease social needs and wants from the forest. If we don't know the carrying capacity, and what it takes to sustain the resource base, future generations will lose options associated with the resources here today. The rule should have a conservation focus; forest planners will need to be able to tinker to get the balance of different forest uses right, but the rule should protect resource integrity so that we don't lose any of the parts that the planners are tinkering with. Ecological needs should drive management decisions; management should be a tool, not an objective.

The Forest Service needs to analyze cumulative impacts, and needs better tools to do this. For example, national scenic trails cross multiple regions and forests; what is the cumulative impact on one forest in one place compared to another?

One person highlighted that the current planning rule describes desired future conditions, but does

not include a process on how to make the vision actually come into being. Another person suggested that "Ecological Restoration" be used as the primary implementation tool for resource management. Several people mentioned that current guidance should be consolidated and used for the forest plans, whether it is from regional guidance documents or peer-reviewed science.

Flexibility

Forest plans should be flexible, living documents that evolve with changing conditions, new technology, and new science, instead of requiring a revision every 15 years. They should not be too prescriptive, and should refer to existing guidance such as the "Principle Laws Pertaining to the Forest Service," other USFS high-scale planning efforts and state assessment and strategy processes as authorized in the 2008 Farm Bill. This included having a flexible framework to promote best management on individual forest system parcels because "one size doesn't fit all." It will be necessary to define the scope, scale, and context of each individual plan. Participants also stressed that the rule should allow flexibility to make changes to forest plans. To that end, some suggested using adaptive planning because it is a continuous process.

Multiple Use and Recreation

The group discussed the wide range of ecological, recreational and economic components that should be considered when developing a forest plan. Many participants highlighted the need to prioritize management activities related to climate change adaptation and mitigation, fire management and invasive species. In fact, one participant suggested that all plans should be required to conduct a threat assessment to prioritize management activities. Some participants highlighted the need to include an economic analysis that includes consumptive uses (e.g., timber) and ecosystem services (e.g., water, carbon and recreation). They highlighted the desire for forest plans to consider the effects on the local economy and to include guidance on economic development, especially related to recreational tourism. Participants highlighted the need to include the wide range of recreational uses, such as: motorized and non-motorized areas, hunting, mountain biking, primitive backcountry designations and scenic areas.

The group discussed their desire for increased public access, for every form of recreation, while keeping it ecologically sound. Wilderness designations and other types of access closures should only be used when absolutely necessary and should be based on science, and opportunities to use trails for limited use should be considered first (e.g., closing a road, but converting it to a walking path). Others urged that the planning rule should include a mandate for multiple use and/or balance among user groups Regarding recreation, participants cited examples of successful multi-use trails systems that cut across forest service, county, and private lands (e.g., the Hatfield McCoy Trail in West Virginia). Similarly, the group suggested that economic opportunities such as timber and tourism should be considered, but it is important that they are ecologically sound.

All recreational pressures (as it is necessary to manage people and not just natural resources) and options need to be included in a comprehensive plan. Specifically, it was noted that the USFS should apply a recreational opportunities spectrum on the regional level, as this type of zoning system best meets all needs.

Collaboration and Partnership

Many participant comments pertained to collaboration. Several participants urged that the planning rule should at a minimum encourage collaboration or even require collaboration. The planning rule may indicate that, at the outset of the planning process, USFS should develop an action plan guiding

public input into the planning process (e.g., a process design or roadmap for the collaborative component of the planning process). If not actually in the planning rule, then the need for such a collaboration roadmap should be part of the planning rule package (i.e., maybe found in an associated manual or handbook.) The collaboration roadmap should itself be developed collaboratively.

Planning processes should be as publicly accessible as possible, from the initial development of the plan. There are good forest plan examples that used this type of interactive discussion. Some noted that for true collaboration to take place, the Forest Service will have to yield some control. Participants also urged that collaboration begin early in the process prior to decision-making. Ongoing public collaboration is one way of ensuring adaptive management.

Some thought that there should be different levels of collaboration or partnership. For example, state resources agencies should be engaged as full partners in the decision process because they act as full partners in land management, maintenance, enforcement, and public safety. As such, they should have a higher level of involvement in Forest Service decisions than other stakeholders. The group highlighted the need to develop relationships with local stakeholders and noted that advocacy groups can help bridge the gap between local and federal groups. It may be necessary to ensure cross-agency collaboration as well as better coordination with the other branches of the agency (e.g., State and Private; Research).

Participants also inquired about how best to bring the public into the planning process. In response, some participants urged more aggressive use of social media and more frequent bi-lateral dialogue between the Forest Service and different groups. Further, participants suggested that the planning rule recommend methods for ongoing communication between the Forest Service and stakeholder groups.

The planning rule should address the following questions related to collaboration: How do we handle situations where the US Forest Service wants to collaborate, but some or all stakeholders do not want to? How do we handle the fact that “collaboration” means different things to different people?

<u>Science and Knowledge</u>

There were a few suggestions and limited discussion about the kind of information that should inform forest plans. Overall, participants suggested using science-based techniques to preserve, protect, and restore indigenous species in indicated ecosystems throughout the lands managed by the US Forest Service. Some suggested the use of best available of science to describe the impacts of certain user activities, noting that all activities have impacts.

Others suggested that science should integrate Tradition Ecological Knowledge and other knowledge claims. Social science is also essential to the planning process. Stakeholders, science, and monitoring are all required to be able to see if you have achieved what you said you wanted to accomplish on a forest.

One person also suggested the rule needs to develop standards or “limits of acceptable change” to ensure recreational opportunities are not harmful. The need for realistic expectations that take funding streams into account was highlighted.

Adaptive Management

Many participants also expressed the hope that the planning rule would be grounded in science and use an adaptive management approach. The planning rule needs to reflect current science while allowing flexibility to evolve as science evolves without having to issue a new planning rule. Because forest plans need to be adaptable, the planning rule should allow for an efficient plan amendment process (e.g., for use between plan revision cycles). Adaptive management must be driven by data and a transparent process, or else the plans lose meaning. Keep the 1982 management prescription requirement, but consider its linkage with an adaptive management process. The planning rule should allow for adaptation as time passes, and knowledge develops; it needs to support planners in changing direction as we learn more.

The rule should require forest plans to identify triggers that would require the plan to be revisited. The trigger should include a threshold and a range. Once the threshold is crossed, the plan must be revisited to see if action is necessary. The planning rule needs to address multiple types of adaptive management for different levels of activity. There are different ways to conduct adaptive management – some more rigorous than others. The Forest Service should 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 of rigor are important in other aspects.

Monitoring and Evaluation

Some participant comments pertained to monitoring and evaluation of forest plans. Some suggested that the new planning rule should include language regarding the need for, and mechanisms to conduct, realistic but effective and scientifically-valid monitoring and evaluation processes. Monitoring should include assessment of implementation (did we do what we said we were going to do?), effectiveness (did it work?), and validation measures. The rule should ensure that each national forest has a system for monitoring the forest to ensure continued resource viability. This system should prevent cumulative impacts that lead to an ecosystem beginning to fall apart.

The essence of the forest is the (ecological) "matrix," and the plan should identify important indicators of matrix health; if these indicators are ok, then everything is okay. The Forest Service is not using enough in-depth indicators to ensure that the matrix is okay. Some people noted that there should be baseline conditions to determine if minimum ecological conditions are not being met, and monitoring should be done through an adaptive management framework.

Planning Process

Participants made several comments on the planning process itself. Some thought the new rule should provide time constraints for developing individual forest plans (perhaps a maximum of two years). When forest plans drag on, personnel changes and the planning process loses momentum. Some believed that the plans should include on what specific Forest Service projects will cost and how much revenue they will generate; it would be helpful for the public to have this information. Some thought the planning process itself should be streamlined so that the funding spent on the process could be used for implementing needed projects on the ground. Others questioned the need for forest plans, noting that a flexible procedure would be more appropriate to changing forests than a fixed plan. Another participant suggested that the planning process be tiered such that the strategic goals are set in one planning process and tactical goals in another process. That would create one long term plan that was then broken up in to smaller plans (annual, two year, five year).

Coordination with Other Land Management Plans

One participant suggested that the rule provide guidance that planning documents should be consistent with goals of other science-based natural resource plans (state, regional, local) and not be inconsistent.

SMALL GROUP / MORNING DISCUSSIONS:
"What Participants Want To See In the New National Planning Rule"

Small Group Discussion Summary

Small group discussions took place in the morning, focusing on eliciting participants' views on what they would like to see in the new USFS planning rule. Following the morning small group discussions, participants came together as one group and shared key themes from their small group discussions about what they would like to see in the rule. They reported the following highlights of discussion topics.

- Include comprehensive regional planning that takes into account what happens outside of the boundaries of the National Forest.
- Need realistic but effective and scientifically valid monitoring and evaluation process.
- Importance of science-based decision making in the plans.
    - Integrate western science with traditional ecological knowledge (other knowledge claims such as indigenous beliefs).
- Consider recreationalists and others who use the forests in developing the plan.
- Forest plans should be built around maximizing ecosystem services and scientific research while providing recreational access and scientific and cultural opportunities not provided on private lands.
- Collaborative from the very start (pre-scoping).
- There is a need for management, education, and enforcement regarding recreation in particular but to address other issues as well. Protect resources and acknowledge the lack of law enforcement.
- Provide for effective forest plan amendment process to take into account adaptive management processes.
- One size does not fit all as there is great variation across the country (back country vs. urban; eastern vs. western). Plan cannot be too prescriptive.
- Leverage and protect cooperative investments made by private volunteer organizations.
- Plans should integrate recreational use on a regional basis and include congressionally designated areas. Include wild and scenic wilderness areas, and national scenic trails.
- Difference of opinion among roundtable participants: Should the plan define the terms "restoration" and "enhancement" or should they require that these terms be defined at the regional or forest level?
- Disconnect between what we plan for and what we implement because there is a lack of funding. Sometimes we promise to do something, but are not able to keep that promise. Need to recognize the reality of the funding situation so that we do not make promises we cannot keep.
- Make the process streamlined, flexible, and have a time frame. Emphasize science-based approach.
- Need peer review to ensure the science used is not tailored to a predetermined outcome.
- In the context of climate change, need a plan to address climate mitigation and climate adaptation.
- Stability in plans for production for consumptive uses should be a principle.
- Mandate protection of cultural and historical resources.
- Keep the process credible – Forest Service needs to give up a certain amount of control to ensure the stakeholders have a say in the process. Need shared ownership of the process.

- Plans need standards and guidelines. Adaptive management needs to be data-driven and have a transparent process.
- Consider that these are natural resources and they are finite. We have talked about how to use these resources, but also need to consider that scientists determine how much of a resource exists. Need to consider the needs of future generations.
- Recognize that there are levels of partnership that need to be informed about the decision making process on the rule (e.g., FWS provides resources for public safety and recreation.) Need a formal recognition of the interagency collaboration.
- Efficient and effective forest plans.
- Provide for an inclusion of services Memorandum of Understanding (MOU) with USFS to streamline the consultation process with FWS.
- Ecological restoration should be the principal driver for ecosystem management.
- Forest plans should be revised as necessary, should be a living document and not be held to a 15 year review timeline as is the current status quo.
- Guidance for forest plans should be consistent with other science-based management plans (e.g., state plans).
- Require guidelines and standards for safety.

Morning session closing comments (Chris Liggett, Director of Planning, USFS Southern Region)

Chris Liggett mentioned that participants provided many good comments about what is necessary in any planning process. He emphasized the need for stronger integration with state, local, tribal, and other planning processes.

Mr. Liggett summarized the comments in alignment with the process for developing a plan. USFS first needs to get all the information we can about the areas we are trying to manage. The assessment process should identify threats, and utilize western science and traditional knowledge. The next step is to launch a process that is collaborative and works closely with other partners, such as federal and state agencies, and local organizations. It is important to make sure to consider all resources and uses, specifically safety, tourism and recreation, culture and historical uses. Once a plan is developed, it needs to be implemented, which requires more than just funding; the plan needs a framework for prioritization and implementation. A nested framework for planning can create a hierarchy from the national plan to the USFS region to individual forest plans. Monitoring and evaluation are critical for ensuring effective planning.

SMALL GROUP / AFTERNOON DISCUSSIONS: "Input on Principles That Should Underlie New National Planning Rule & How Rule Should Reflect Them"

During the afternoon, participants rotated in small groups through four stations that each focused on a subset of the eight NOI planning principles. Five of these planning principles are classified as substantive principles, and three are classified as process principles. Participant comments are summarized here and a complete list of participant comments can be found in Appendix C.

Station 1 focused on Substantive Principles 1, 2, and 3.

Substantive Principle 1: Land management plans could address the need for restoration and conservation to enhance the resilience of ecosystems to a variety of threats.
Substantive Principle 2: Plans could proactively address climate change through monitoring, mitigation, and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information.
Substantive Principle 3: Land management plans could emphasize maintenance and restoration of watershed health, and could protect and enhance America's water resources.

Restoration

Most participants indicated that, in practice, the definition of "restoration" is ambiguous. They discussed whether there is a need to include a definition of "restoration" in the new rule. There were differences of opinion about this, but the general trend of comments seemed to be that it might be helpful to have a high level definition of the term in the rule and direct forest and grassland planners to address it more specifically when developing plans for individual land management units (e.g., identifying specific restoration goals and implementation tactics, perhaps with the help of a multi-stakeholder advisory group). It was noted that there is a definition of the term in the Forest Service Manual that could work, and a similar one used by the Society for Ecological Restoration.

One of the controversial restoration-related issues identified by participants is the selection of the reference point for restoration – i.e., to what state an ecological community is being restored. To the extent that the reference point selected is (or is perceived to be) "pre-historic" conditions, that would meet with resistance in some quarters. One reference point suggested was the best native communities existing in the area. Related suggestions offered by participants were to:

- Manage with a focus on: (a) species diversity; (b) ecological resilience; (c) ecological integrity (e.g., all the parts of the system are present and intact); (d) ecological stability; and (d) ecological functionality;
- Focus first on those forest stands that are least resilient, and use adaptive management to guide restoration efforts;
- Retain the provisions on ecological sustainability embedded in the 2005 and 2008 planning rules;
- Factor watersheds and water quality into restoration goals.

Another point of controversy involved the potential harvest of biomass from national forests for energy production. Some participants expressed strong views that no biomass harvest for energy production should be allowed on the national forests. Their concern is that this would contribute to the development of an unsustainable market. A Forest Service participant observed that biomass

harvest may be the only way that the USFS will be able to accomplish some restoration goals. There was some indication that if the biomass harvest was done for the purpose of restoration, it might be more acceptable even if the biomass were used for energy production; however, some still had strong concerns about any biomass harvest for energy production.

Watersheds

Participant suggestions about the "watershed principle" included the following points (in addition to the above-referenced suggestion to factor watersheds and water quality into restoration goals):

- The rule should give forest planners guidance on how to manage water supply in the context of forest fragmentation;
- In the Southern Region, watershed health requires an "all lands" management approach; the rule should direct planners to take local land management initiatives into consideration in developing plans for individual management units such as a national forest or grassland;
- Watershed health is scale-dependent, and thus needs to be defined at the level of the individual forest or grassland;
- The water quality on our national forests and grasslands should be the best in the nation. Thus, there should be some kind of standard for watershed health identified or called for in the new national planning rule (e.g., perhaps focusing on turbidity, which is linked to roads); state water quality standards cannot be assumed to be sufficient to protect water quality on national forests and grasslands.

Climate

Much of the discussion related to the "climate change principle" focused on how to work with the uncertainties associated with climate change impacts. There was some difference of opinion among participants about how proactively national forest and grassland management plans should address climate change. Many participants acknowledged that there is uncertainty associated with various aspects of climate change (e.g., how exactly its impact will be felt on the level of an individual forest or grassland), but that enough is known about climate change and humans' contribution to it that it should be addressed proactively in management plans. One participant saw it as a natural phenomenon, requiring no elevated response. Another felt that it should be "considered" in the planning process, but because there is significant uncertainty about likely impacts, it is premature to address it "proactively."

Participant suggestions about how the rule might guide planners in considering climate change despite the associated uncertainties included:

- Acknowledge the uncertainties;
- 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, we'll take this management approach; under "y" conditions, we'll take that management approach);
- Frame climate change as 1 of a cluster of "disturbance events" (including fire, invasive species infestations, ice storms, etc.);
- Require management plans to identify risks pertinent to that forest or grassland, but that a national rule should 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; and
- Identify trigger points for updating management plans.

Other

Participants in the afternoon discussions also suggested that the USFS add another "landscape scale" principle to the framework underpinning the new planning rule, but this one should be of a social nature. The principle should require planners to consider the "social landscape" – i.e., land rights, recreation needs, commodities potentially produced from the management unit, and special uses.

Station 2 focused on Substantive Principle 4

Substantive Principle 4: Plans could provide for the diversity of species and wildlife habitat.

Participants were asked to reflect on the above principle and respond to the focal questions:

1. At what landscape scale and how should the Forest Service analyze and provide for diversity of plants and animals (individual unit, watershed, landscape scale)?
2. How should the planning rule guide monitoring and protection of at-risk species of animals and plants and their habitats?

There were a few comments regarding the *appropriateness of two specific questions in that these are prescriptive and not strategic and do not capture all aspects of species diversity.*

Science

There seemed to be a general agreement that the USFS should use best available science and adaptive management processes in order to incorporate new information. The science and outcomes must be measurable and deliverable. There was a lot of discussion related to viability. Some of the specific suggestions include: provide guidance on how to measure for species viability; maintain a species viability standard; update viability science; use population viability assessments (PVAs) for focal/target species; and do not include MIS as a viability indicator. There were also several participants who noted that plans should include a "precautionary principle" to deal with uncertainty.

Monitoring and Evaluation

Many participants highlighted the need for meaningful monitoring and evaluation to ensure plans are meeting their stated objectives. Some people suggested that monitoring needs to be targetable and measurable so that the Agency does not over-monitor. There should be a distinct reason for monitoring and the planning rule should not commit forest plants to monitoring that they can not practically accomplish. Some participants suggested that the planning rule should not prescribe the protocol and methodology, as science is always advancing. However, others gave specific ideas on how to monitor, such as: encouraging the use of existing monitoring/community classification data where it exists and developing standards to ensure it is used consistently; taking advantage of new

monitoring approaches for individual species; and using DNA monitoring. It is not clear whether participants wanted this level of detail included in the planning rule.

Management System and Scale

In general, participants seemed to agree that management should focus on the community/habitat/ecosystem/guild system, as opposed to single species. They highlighted, however, that there are some cases when a single species approach is appropriate, such as when a species is so imperiled and depends solely on a Forest and when it is required by law. The group also seemed to agree that assessments and goals should be focused on the eco-regional or landscape scale, though there were some differing opinions. For example, some participants felt that species diversity should be applied to the individual unit (e.g., forest boundary and watershed area) instead of the region.

There was also differing opinions on what specific guidance the planning rule should give. Some participants thought the planning rule should not prescribe what level to manage at; there should be flexibility in individual forest planning processes to make these decisions. Others thought the planning rule should say that forest plans need to address species at the landscape scale. For example, one suggestion was that the Forest Service utilize available landscape-scale assessments and analyses such as the Resource Protection Act (RPA) Assessment. The key thing is simply to identify the references you are using in this landscape framework; it is not always necessary for the US Forest Service to develop the assessments; it can use the ones that are out there.

The rule should provide guidelines for corridor management for national scenic trails consistent with the National Trails System Act. It can provide guidelines for addressing corridor management associated with Congressionally-designated natural or scenic areas. It can view Forest Service lands as refugia (corridors) in the age of climate change. Participants mentioned the need for a solid framework to connect forests to allow for species migration and movements - consider eliminating the islands of extinction.

Diversity

There were a range of opinions related to what the USFS priorities related to diversity should be. Some participants felt that biodiversity conservation should be a goal, especially in the face of climate change. Others thought that species diversity should not be over emphasized over other planning considerations, such as human interaction and economics. There was some discussion about what time period restoration should focus on. Some participants felt restorations should be based on existing (or anticipated) conditions on the ground and not necessarily what was is the past, and others thought a long-term perspective should be used. There were also some differing opinions on what to do about non-native invasive species (NNIS). Many participants felt that USFS should provide for the removal of NNIS and that management strategies should be developed to protect against insect, disease and invasive species. Others thought that there may be instances where USFS should accept some non-natives as part of the community. Finally, some participants felt the USFS questions for feedback were too tactical and implied a prescriptive answer. They felt that the there should be a strategic emphasis.

Station 3 focused on Substantive Principle 5

Substantive Principle 5: Plans could foster sustainable NFS lands and their contribution to vibrant rural economies.

Local Economics Incorporated into Planning

There was some division among participants on whether local economics should be incorporated into forest planning. Most participants seemed to agree that plans should consider how implementation will affect local economies since the forest has such a large impact on local communities. Some noted that plans should work to create a stable business environment. Others, however, felt the role of USFS is not to be operating as a business, but instead to serve the public today and in the future. They noted that forests do not need to contribute to the community.

Identification and Assessment of Forest Resources

Many participants suggested that the Rule prescribe that the USFS clarify the outputs from the forest, and some suggested that USFS have the authority to quantitatively value forest resources. The type of values participants were referring to ranged from ecosystem services (e.g., water, scenery, wildlife, carbon sink), consumptive uses (e.g., timber), non-traditional markets (e.g., biomass), ecotourism resources and jobs.

Some wanted to allow the Forest Service to engage in market-based approaches to conservation, such as habitat markets, wetland banking, and water quality trading. The planning rule could allow the Forest Service to evaluate how the agency can function as the end destination for conservation projects, such as wetlands banks and habitat areas.

Comprehensive Planning and Prioritization of Ecology

Participants acknowledged that comprehensive planning supports vibrant communities as all users interact, which leads to various forest uses interacting well. Many discussed the need to prioritize ecology over other uses. They noted that a healthy ecosystem promotes ecotourism and the process of restoration, maintenance and enhancement. Participants suggested that the Rule require thresholds for economics, based on ecological sustainability. They also suggested that USFS incorporate mechanisms that provide for social and economic inputs at a variety of spatial and temporal scales.

Consideration of the Local Economy

Most participants highlighted the need to consider the local economy by first understanding the expected future. This could be done by: reviewing local economic development plans and tourism plans; collaborative processes to identify priorities and drivers; conducting a value assessment as described above, capturing economic, political, and social data with GIS; and identifying potential forest-related jobs (e.g., in restoration). Many participants felt that while economic impacts should be considered, decisions should be based on the resources availability and sustainability. Some participants noted that it is outside the scope of USFS to encourage or discourage a certain type of economy, though some thought plans should discourage a single industry economy. One participant noted that plans should let the capital market run its course, meaning that USFS should not be too prescriptive in economic planning.

Collaboration with Local Stakeholders

Most participants highlighted the need for buy-in from local communities, and therefore the need for a collaborative process that is accessible to the public. This will likely require proactively involving advocacy groups and local stakeholders. Some participants suggested that there be a pre-implementation appeals process for those stakeholders that have been involved in planning. Since forest planning involves people's livelihoods, there may be conflict. Therefore, the Rule could provide direction on how to foster collaboration and conflict resolution. It is important to note that

some participants highlighted that while locals should have input, forests belong to every American citizen, and so local stakeholders should not necessarily have prioritized input.

Definitions/Terminology

Many participants highlighted terminology questions. They suggested that the Rule should have clear definitions for the following terms: vibrant, rural, sustainable, ecosystem services and social sustainability. They suggested using "local economy" instead of "rural economy" and "values" instead of "multiple uses." The reasoning for the latter is so that people do not feel a need to defend their individual uses, but can instead focus on their common values.

Station 3 focused on Process Principles 1, 2, and 3

Process Principle1: Land management planning could involve effective and pro-active collaboration with the public.
Process Principle 2: Plans could incorporate an "all-lands" approach by considering the relationship between NFS lands and neighboring lands.
Process Principle 3: Plans could be based on the latest planning science and principles to achieve the best decisions possible.

Process Principle 1 (Collaboration)

Participants offered many comments in response to the focal question about collaboration. These are sorted into various themes below.

Early efforts at collaboration: Many participants suggested that the rule should encourage if not mandate early efforts at collaboration. Additionally, it should require providing feedback on how public input is used (influence on the process). They suggested that collaborative workshops should be held prior to scoping sessions and that the Forest Service should create and publicize blueprints for the entire planning process.

Breadth of involvement: Many participants encouraged the Forest Service to seek broad stakeholder involvement from a broad representation of user groups. The Forest Service should also involve all adjoining land owners at the beginning of the process to identify joint efforts for land management. There was some disagreement about the degree to which certain stakeholders should be involved. State resource agencies believe they should be treated as full partners in the decision process since they share in land management responsibilities, whereas other stakeholders should involved but not treated as full partners.

Institutionalize Collaboration: Participants urged the Forest Service to look for ways to institutionalize collaboration. The Forest Service could develop partnerships in the planning process through a consortium, joint fact finding, or data collection. It should find ways to solidify partnerships from creation through monitoring and evaluation. True collaboration can only be achieved when the Forest Service gives up some control.

Clarify Roles and Responsibilities: Some participants asserted that the rule needs to clearly articulate up front the roles and responsibilities of various participants in the decision process. All will have a better understanding of their roles and know who the decision maker is that needs to be held accountable.

Outreach for Collaboration: Participants urged that the rule should suggest mechanisms for reaching out to the public/stakeholders to educate them about the importance of planning and get more involved in the planning process. Forest Service should promote the use of social media to broader participation and collaboration.

Process Principle 2 ("All-Lands" Approach)

In discussing this principle, participants commented that an "all-lands" approach could potentially be useful from an analysis and planning point of view, but its poses implementation challenges. For example, some participants commented on the importance of considering trans-boundary issues when planning and, to the extent possible, the usefulness of viewing other contiguous public lands within strategic goals of the rule. Some participants noted that an all lands approach would work well for some issues (e.g., water quality and forest health, diseases, insects, fire, invasive species, habitat corridors, easements). Others noted that an all-lands approach would not work because of the uniqueness of adjacent tracts. All agreed that any all-lands approach would require extensive collaboration with adjacent landowners, whether public or private, and that the Forest Service would have to consider the land-use plans of other entities. Several participants found the term "all-land" problematic and troublesome (i.e. "why don't you just put a bulls-eye on the Forest Service") and that the Forest Service should not be in the business of telling other landowners what to do with their land.

Process Principle 3 (Scientific Foundation)

Many participants were confused by the phrase "latest planning science." They didn't 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. Others noted that science itself is only one way of knowing, and that forest planning should accommodate other ways of knowing (such as traditional ecological knowledge and professional judgment) and social and planning science. Others had very specific recommendations (e.g., all forests should have a lidar flown at 10 year intervals on a 1 meter cell size; the Forest Service should prescribe to the precautionary principle to handle management uncertainties). There was also some discussion on the role of science in addressing value differences. One participant noted that collaboration should be used to reach agreement on the values for forest management; science should be used to reach agreement on the objectives that reflect those values.

Additional Comments

USFS received additional participant comments via e-mail (see Appendix D) and blog (see Appendix E).

CLOSING PLENARY

Facilitator Marci DuPraw reported themes from the small group discussions focused on Substantive Principles 1, 2, and 3 ("Restoration," "Climate Change," and "Watersheds").

- There is confusion or lack of awareness regarding the term "restoration." Should define this in the rule at a high level, but individual forest plans should be able to tailor this rule.
- What reference point do you use for restoration? Use native communities as a reference point.
- There was some good language in the 2005 and 2008 planning rule on restoration planning.
- Manage water supply with forest fragmentation.
- Watershed health tied closely to all-lands approach.
- Watershed health is a scale-dependent factor. The rule can have a standard to help determine how to measure watershed health.
- In terms of climate change, should uncertainties in the science and magnitude of effects get in the way about addressing climate change? Give guidance on the scale at which climate change impacts should be assessed.
- Social landscape principle may be added.
- Controversy around biomass harvest in the forest.

Facilitator Mary Apostolico reported themes from the small group discussions focused on Substantive Principle 4 ("Species and Habitat Diversity").

- Need for good science.
- Inventory, monitoring, and evaluation is very important. Provide guidance but leave methodology for best science.
- Coarse and fine filtering approach and temporal scales.
- Do what you say and say what you do. We promise many things, how to we measure if we have done them?
- There was a lot of agreement in using a community rather than a single-species approach.
- Strategic approach rather than a tactical approach.
- Most thought there should be a nested approach. Forest plan should complement the larger eco-regional approach.
- Technology, people, and funding are crucial for on the ground implementation.
- Need to include state and private adjacent lands.

Facilitator Laura Sneeringer reported themes from the small group discussions focused on Substantive Principle 5 ("Vibrant Rural Economies").

- Planning rule should prescribe a value assessment for recreation, tourism, new industries, ecotourism, etc. This assessment may provide a quantitative value for these services.
- Comprehensive planning. For example, a comprehensive recreational management plan would consider all recreational uses and stakeholders. Some think this should include land beyond Forest Service land.
- Should consider local economies. They should proactively involve local stakeholders. However, need to remember that the forests are here for everyone today and in the future.
- Need to clarify some terminology (e.g., vibrant, rural, and multiple-use should be better defined).

Facilitator Steve Garon reported themes from the small group discussions focused on Process Principles 1, 2, and 3 ("Collaboration," "'All-Lands' Approach," and "Scientific Foundation").

Process Principle 1 (Collaboration)

- Should make early efforts toward a collaborative process.
- Create or publicize a blue print.
- Should involve all adjoining landowners.
- Have requirements for collaboration.
- Provide feedback on how public input is used (i.e., the degree of influence the public input has made on decisions).
- Institutionalize collaboration.

Process Principle 2 ("All-Lands" Approach)

- This is a good approach for analysis, but maybe not for decisions.
- Some areas will need specific plans based on their unique attributes.
- Consider trans-boundary planning concerns that may create impediments to successful management.

Process Principle 3 (Scientific Foundation)

- Confusion about this principle. Is it best available science or planning science? People interpreted this both ways. Some suggested deleting the word "planning."
- Science should be viewed broadly. Want to consider traditional ecological knowledge.
- Collaboration is a tool to reach consensus on values, while science is a tool to reach consensus on objectives.

Closing Comments (Chris Liggett, Director of Planning, USFS Southern Region)

Chris Liggett provided closing comments and thanked participants for their ideas. The final national round table will provide a summary of all of the regional roundtables. Mr. Liggett will attend this national round table. USFS looks forward to continuing this dialogue.

APPENDIX A: PARTICIPANTS LIST

First Name	Last Name	Company/Organization	City	State
Fareez	Ahmed	USFS		
Elwood	Barka			
Todd	Berman	Huber Engineered Woods, LLC	Spring City	TN
Ruth	Berner	USFS	Asheville	NC
James	Bishop	Bishop Tree & Horticulture	Marietta	GA
Brooks	Bollman	GA Forestwatch	Atlanta	GA
Brooks	Bollman	Moble Media Enterprises	Norcross	GA
John	Brubaker	South Carolina Native Plant Society	Awendaw	SC
David	Byrd	USFS		
Haven	Cook	National Forests in Florida	Tallahassee	FL
Mike	Countess	Southern Group of State Foresters	Cottontown	TN
Tony	Crump	USFS		
Michael	Crump	USFS Southern Region	Atlanta	GA
Darcy	Douglas		Atlanta	GA
Meredith	Dowling	SouthWings	Asheville	NC
Bruce	Dreher	Georgia Recreational Trail Riders Association (GARTRA)	Roswell	GA
Steve	Duzan	Ozark-St. Francis National Forests	Russellville	AR
Herndon	Elliott	SFWDA	Madison	AL
Martha	Fillingham	Back Country Horsemen of North GA	Epworth	GA
Paul	Finke	USFS	Winchester	KY
Mark	Fly	University of Tennessee	Nashville	TN
Judy	Francis	NC Dept. of Environment & Nat. Res.	Swannanoa	NC
Heather	Frebe	USFS Southern Region	Atlanta	GA
Bob	Gale	Western North Carolina Alliance	Asheville	NC
DJ	Gerken	Southern Environmental Law Center	Asheville	NC
Al	Hammond	National Rifle Association, Southern Regional Director, Field Operations Division	Alachua	FL
Larry	Hayden	USFS		
Andrew	Howe	GA Cruisers	Roswell	GA
Felicia	Humphrey	USFS		
Wayne	Jenkins	Georgia ForestWatch	Ellijay	GA
Josh	Kelly		Asheville	NC
Chris	Liggett	USFS Southern Region	Atlanta	GA
Mary	Long	USFS		
Jeff	Long	USFS		
Heather	Luczak	USFS		
Carlos	Martel	Back Country Horsemen of N. GA	Mineral Bluff	GA
Brent	Martin	the wilderness society	Franklin	NC
Dan	McKeague	Florida Trail Association	Tallahassee	FL
John	Medicus		Woodstock	GA
Michelle	Mitchell	National Forests in FL	Tallahassee	FL
Gary	Monk	GA Appalachian Trail Club		
Rick	Moon	Georgai Pinhoti Trail Association	Dalton	GA
Michael	Morris	Domtar Paper Company	Kingsport	TN
Mary	Morrison	USFS		
Catherine	Murray	Cherokee Forest Voices	Johnson City	TN

Stephen	Novak	WildLaw	asheville	NC
Brett	Paben	WildLaw	St. Petersburg	
Bill	Pell	USFS		
Gary	Peters	National Wild Turkey Federation	Prosperity	SC
Rob	Pitts	USFS		
Ben	Prater	Wild South	Asheville	NC
Denny	Rhodes	Georgia Appalachian Trail Club	Smyrna	GA
Dorian	Roffe-Hammond	Georgia State University	Atlanta	GA
Felipe	Sanchez	US Forest Service	Asheville	NC
Tom	Sauret	IMBA-SORBA	Gainesville	GA
JP	Schmidt	University of Georgia	Athens	GA
Susan	Shaw	USFS		
Mark	Shelley	SAFC	Asheville	NC
Alan	Shirley	Southern 4WD Association	Ringgold	GA
Stan	Simpkins	U.S. Fish & Wildlife Service	Jacksonville	FL
Marek	Smith	The Nature Conservancy	Warm Springs	VA
Morgan	Sommerville	Appalachian Trail Conservancy	Asheville	NC
Kent	Streeter	Deltic Timber	El Dorado	AR
Robert (Bob)	Sullivant		Trinity	AL
Jack	Swanner	Southern Appalachian Multiple Use Council		
Roger	Theurer		Manchester	TN
Jerome	Thomas	USFS		
Paul	Trianosky	The Nature Conservancy	Mountain City	TN
Ray	Vaughan	WildLaw	Montgomery	AL
James	Walker		Ellijay	GA
Alex	Watson		Atlanta	GA
Barbara	Wysock	USFS		

APPENDIX B:

LIST OF COMMENTS FROM MORNING SMALL GROUP DISCUSSIONS ("What Participants Would Like to See in the New National Planning Rule")

- Preserving the natural state of the forest-part without human influence.
- Flexibility to make changes.
- Realistic but effective-scientifically valid monitoring and evaluation process
- Streamlined process so funding can be used for implementing needed projects on the ground and not caught up in endless planning process.
- Flexible framework to promote best management on individual national forest system-unique in south vs. out west. One size doesn't fit all.
- Recreation opportunities-these need to be included no matter what recreation purpose. I do a lot of that and not in outline of upcoming plan.
- Recreation not part of substantive or process principals.
- Integrating science with TEK. Tradition Ecological Knowledge-other knowledge claims i.e. tradition we don't bow down at western science.
- Best available science beyond FS-incorporate local knowledge, partnerships with schools.
- Recognize levels of partnership for input i.e. state resources agencies engaged in decision making not just input specifically for state fish and wildlife agencies b/c responsible for wildlife in state. Act as full partners in land management-act as full partners-maintenance, management, enforcement, public safety-higher level of involvement.
- Mandate for multiple use within planning rule.
- Upfront collaboration echoing Ray and Jack things work out better when ask for input before decision is made.
- Way to allow for balance of user use, squeaky wheel gets the oil right now and that is not good enough.
- Important FS gives up some level of control to really be really collaborative. Only time really successful when they succeed some level of control to stakeholders.
- Rule needs to articulate roles and responsibilities up front of various participants (i.e. state agency or stakeholder-who is going to sign that decision-person also needs to be accountable).
- Utilizing of best available of science information that will describe the impacts of certain user activity. Regardless of your activity there are areas on national forest lands that can accommodate a variety of users. Show real impact of activity.
- Rule provide guidance that planning documents are consistent with achieve goals of state, regional, national i.e. other science based natural resource plans and not be inconsistent.
- Expectation of balances of different aspects – social, economic and ecological-framework. We consider all these but not equally balanced.
- Have some method of ongoing communication between FS and stakeholders.
- Emphasis on monitoring including implementation-did we do what we said we were going to do. Effectiveness-did it work and validation.
- Time constraint in developing individual plans so that the personnel don't change or the emphasis. Maybe 2 yrs maximum. Lose momentum.
- Should define timeline period. Well defined not just timely.
- Vegetation Management-Science based ecological restoration guiding philosophy clearly reflected in both rule and plan.

- Address financial issues-commenting on FS projects don't have information on how much is it going to cost. Helpful for the public to know.
- What this is going to generate-will project generate money for forest
- Emphasis on planning at watershed levels. Climate change implication on protecting our water sources. Landscape level-all lands approach. Forests go down to smaller level.
- Some system for communicating two ways-I have a way to report my date for others to use and benefit from. Everything needs to come together. Systematic way to share information.
- Greater collaboration between county lands, Forest Service for user groups. Trail systems that go across property.
- Multi-use recreation trails in collaboration with private and public partnership i.e. Hatfield McCoy Trail in West Virginia includes private property and Forest Service, state. Option to be discussed available to anyone who wants to use-not available in southeast, seen it more out west.
- Rules should require collaboration with stakeholders better than HFI or HRA.
- Missing a huge opportunity to bring public in. How do we take advantage to planning process?
- Publicity that people can get-news ways to receive information-social media.
- Better and more bi-lateral dialogue with groups.
- Emphasize strategic planning over tactical planning. Big picture vs. site specific.
- Need to communicate importance of planning process-it is a challenge. Very difficult to try to get people there and they don't show up.
- Find a better way to message-missing an education piece-how we message, educate public better collaboration. Missing communications piece and bring more people to the table.
- This is neat that this is occurring. Policy will be set on what comes out of this meeting.
- Adaptive planning versus big gulp planning. Adaptive is continuous process or big gulp its all junk and we are going to scrap and start over.
- Proactive instead of reactive.
- Good to see process being open but Forest Plans in past at implementation stage have been obstacle not as visionary, forward looking goals of how want forest to look. More like an albatross around people's neck
- Why do we have to have a forest plan? What we need is a procedure to move on and keep a flow. It is an ongoing process change day to day.
- Way to set strategic goals in one planning process and tactical goals in another process. Have one long term plan and then broken up in to smaller annual or two, five year plans. Tiered level approach in planning.
- Species viability concerns - address framework to ensure NFMA requirements are satisfied.
- Sustain diversity.
- Include regional comprehensive planning for natural resources, not just the national forests themselves. Meet both ecological and social needs. Include other agencies and private stakeholders. Nested approach for landscape and ecosystem planning can accomplish this. The Planning Rule should evidence a nested approach to planning where the National Forest plan plays a contributory role in landscape-scale and eco-region scaled goals.
- Consider forest plans within the context in watersheds. Consider connectivity of water bodies. Consider multi-jurisdictional planning (i.e., one plan would address a river that crosses through federal and non-federal lands). Should consider analysis of roads within the watershed, because they are a major source of runoff into the watersheds.

- Coordinate with state assessment and strategy process as authorized in the 2008 Farm Bill, particularly related to specified "priority areas."
- Plan should recognize that one size does not fit all and there is diversity across the country. Need to define scope, scale, and context of each individual plan.
- The planning rule should reference the other USFS other high-scale planning efforts.
- Commit agency to comply with best available science. Conduct meaningful monitoring and evaluation of that monitoring
- Monitoring is the heart of adaptive management. The rule can direct that monitoring be an important part of adaptive management. Need money to monitor. Need to make sure there is funding. The rule has nothing to do with the budget. Rule is powerless at driving what gets done, need funding to accomplish that.
- From a business perspective not taking advantage of money that they can take in. Where a forest is meeting social and ecological needs, should consider ways to bring in money from forest resources.
- Use and enjoyment should be encouraged. Want a minimum threshold for damage. May have to close a road that is causing damage, but for continued usage and access may look to open walking paths which would cause less damage.
- Make the process as publicly accessible as possible.
- Want public access for every form of recreation while keeping it ecologically sound. Want to keep trails low impact but open for everyone to use.
- Wilderness designations limit access. Suggested judicial use of wilderness designations so as to not prevent access unless it is necessary. Make designations based on science and understand what the damages are if you are going to allow multi-use purposes. Timber and tourism provide economic value to the forest, but it is important to ensure they are ecologically sound. Management strategies can default to wilderness too quickly.
- Rule should not be prescriptive. Rule should refer to "Principle Laws Pertaining to the Forest Service."
- Rule should consider law enforcement. If things in the rule are not enforced, they are useless. Needs to focus on federal, state, and local law enforcement.
- Rule needs to direct that any particular forest plans needs to identify the recreational pressures on the land. The Park Services manages people (and not just the natural resources). Need a comprehensive plan for all recreational options. Need to approach this process in a collaborative way.
- Need to take a significant look into local issues. Forest Service does not relate well to the local stakeholders. Need them to develop relationships with local people. Advocacy groups end up being the mortar between the local and federal groups. Without an advocacy group, they were not talking to one another. Need better coordination with local interests. Local people want tourism revenue and there is an opportunity to have an economic impact in these areas. If planning happens on a regional basis, there is good opportunity to form partnerships and determine the best recreational opportunities. Relationships with local governments are important for recreational portals into the forest.
- Rule should specify that there is a collaborative approach for the initial development of the plan. Some forests already do this at the forest plan level. It removes some of the problems that have come up when the public was not engaged in the first place. There is interactive discussion that leads to the development of a good plan and there are good examples of this.
- Plans need to be developed in a timely fashion, so that these good ideas do not cause a delay in plan development.

- In the past, decided to revise forest plans every 15 years. Want to streamline the revision process that capitalizes on the huge investment the public has invested in the planning process. Build on the lessons learned. The forest plan should be a flexible living document that evolves with changing conditions, new technology, and new science. Make plans adaptive and responsive without burdening the Agency and the public with procedural gridlock.
- Forest Service funds need to go where they are supposed to.
- Need collaboration from the beginning -assessment of management situation – before things are set in stone. Need to integrate collaborative input from the public into the planning process.
- Apply recreational opportunities spectrum on the regional level. Zoning system to best meet all needs. Forest Service cannot do everything. Need to develop standards or "limits of acceptable change" to ensure recreational opportunities are not harmful. There is insufficient knowledge to understand the limits of acceptable change. These limits vary across the country. Need funding to do this analysis
- Will they get the recreational funding once a forest is designated as a recreational area?
- In the past, calculated carrying capacity and set up standards to monitor. We do a poor job of monitoring. Want to see a return to determining a baseline carrying capacity number. Challenge with this is it varies based on weather, type of use, time. The reason for moving away from the carrying capacity number is due to these variations.
- May need to ensure cross-agency collaboration to develop partnerships.
- Need a way for adaptive management because that would take into account the most current science.
- Rule needs to address connectivity.
- Increase development of multi-use trails.
- Incorporate all types of outdoor recreation, including motorized and non-motorized types.
- Environmental analysis should include accurate disclosure and detailed discussion of social and economic impacts of proposed rule.
- Should oppose the "all lands" approach. USFS lacks jurisdiction over state and private forests. It should not waste resources.
- Assess cumulative impacts and impacts on adjoining land through a multi-jurisdictional planning approach that crosses scales.
- There should be effective intergovernmental coordination on resource planning at landscape levels.
- Quicker decision making would be great as well as more flexible planning process.
- Find a way to ensure that the process is accessible to a wide group – not just to those already involved.
- Ensure that information needed for monitoring is provided in an additional format that is less technical so that interested members of the public can provide input on potential regulatory violations.
- Build in process for ensuring appropriate interagency planning, MOUs, etc at regional, state and local levels.
- The Rule should direct forest plans to focus on forest resiliency as a management goal for dealing with climate change, protecting diversity, etc.
- A rule should direct plans to prioritize and protect forest stands that are the most intact and ecologically healthy (i.e., diverse with appropriate species). These areas are invaluable for maintaining present resiliency and diversity.
- A way to ensure objective science.

- Objective science would inform forest planning and insure adequate monitoring of decisions. To maintain/enhance ecological viability and diversity, provide for inventory and monitoring using best available science and methodology.
- Allow construction of designated shooting ranges and designated recreational shooting areas to be a part of management plan.
- Direct plans to be "say what you do, do what you say" oriented. Use this approach to quality assurance (QA).
- All plans should outline how to sustain the supply/production of multi use; goals for multi-use should be outlined.
- Recognition of national scenic trails & other congressionally designated areas as landscape features requiring special management considerations and practices, requiring appropriate guidelines and standards to direct management in rule
- Clear definitions for recreational planning.
- Provide for viable timber sales program.
- Define Climate Change adaptation strategies.
- Provide for fire management, climate change adaptation/mitigation, strategies for addressing forest fragmentation.
- Provide for clearly measureable and monitored goals for management designations. *Contact provided by: J.P. Schmidt, Ecology, UGA*
- Science based decision making that draws from a consensus across the existing peer-reviewed literature. *Contact provided by: J.P. Schmidt, Ecology, UGA*
- Provide for scale for monitoring—maybe at the management unit level.
- All plans should establish a framework for "Adaptive Management" based on sound science, principles of conservation biology, and robust cost effective monitoring protocols. *Contact provided by: Ben Prater, ben@wildsouth.org*
- Include procedures for implementing goals and desired future conditions, provide process for implementing vision. Current planning rule has desired future conditions but does not include a process of how to make the vision actually come into being.
- Include direction to prioritize management for those areas most in need of management and provide goals in plan to identify priorities of management, e.g., fire, WUI, fuel reduction.
- All forest plans should develop a systematic approach to implementing "Ecological Restoration" as the primary tool for resource management, enhancing both ecosystem services & maintaining resilient ecological communities. *Contact provided by: Ben Prater, ben@wildsouth.org*
- Economic thinking and modeling should consider & incorporate carbon budgets, recreation, hydrologic and ecosystem services. Provide for analysis of economic opportunities for ecosystem services. *Contact provided by: J.P. Schmidt, Ecology, UGA*
- New rule should have analysis for economic markets for ecosystem services (water, etc). Current rule doesn't foster anything but timber economy.
- Plans should leverage and protect investments made by private organizations, e.g, volunteer organizations do work and then lose the area.
- All plans should provide guidance on economic development and trails tourism for outdoor recreation.
- Should provide active management against invasive species.
- Ensure hunting is one of recreational multi use activities.
- Consider setting in which the unit lies—planning processes provide mutual gains and compatibility for public land management—consider adjacent lands, both public and private.

- Provide for (and need) better consultation with state partners.
- Provide for integrated and regionally specific outdoor recreation management in planning rule; have national consistency but with appropriate use in regional differences based on management areas and CDA.
- Provide an ecological fiscally sustainable travel, i.e., road, system. Provide guidance for road systems that reflect budget reality and minimum road systems that can be afforded. Current regulations require forests to "identify" the road system. Planning rule should go the next step. This is one area where on-the-ground decisions should be made at the plan level.
- Define consumptive use sales goals for 10 yr time horizon, e.g., private corporations can't build facilities due to changes.
- Uniformly employed national trail classification system, i.e., Interagency Trail Data Standards, with standards and strategy for conflict resolution
- Consider and provide guidelines for conflicting interest (e.g., woody biomass removal effecting wildlife habitat).
- Required public participation should be emphasized.
- Keep the provision for use of maps and descriptions of geographic areas.
- Should be base line minimum standards to define ecological conditions and monitoring to determine if conditions aren't being met.
- Provide public access to all managed lands (discussion below).
- Categorize and treat mountain biking as non-motorized vehicle use.
- Consideration of effects on local economy as high priority.
- Prioritize Climate Change as central issue in Forest planning to develop both mitigation (carbon) and adaptation (biodiversity) strategies. *Contact provided by: Ben Prater, ben@wildsouth.org*
- Consideration of all forms of motorized and non-motorized recreation as a priority.
- All plans should be required to conduct threat assessments to prioritize management activities and address threats to forest health as they arrive, e.g., fire, disease, non-native invasive species, etc. Context is do threat assessment at plan level and part of metric on how to do this proactive or in a timely response manner. *Contact provided by: Ben Prater, ben@wildsouth.org*
- Provide for management of cultural and historic resources as a critical component, through inventory, protection, interpretation.
- Provide for inter-agency coordination and intra-agency coordination. Example, all info needs to be consolidated and put into forest plans— southern forest threat assessment, TACCIMP, FIOA, SRS, currently not enough synergy into forest decisions and could be synergized to inform forest plan development.
- Develop a sense of synergetic management prescriptions for specific management areas. *Contact info provided by : Dan McKeague, Florida Trail Association, dmckeague@fs.fed.us, 850-523-8525*
- Public and agency staff safety should be incorporated into management plans. Example is there are issues with LEO not being able to get to areas of the forests
- Mechanism that incorporates regional guidance documents in all plans within region (e.g., R8 old growth guidance only implemented in North Carolina but since it's not part of the plan, it's not enforced).
- Should offer alternative primitive, non motorized back country designations
- Question-is USFS asking for content for rule or mandating for plan? Response-USFS needs to know how to provide for these things in a planning rule—we may agree this is a goal to

reach but how can the planning rule help us achieve this—what did the previous rule not adequately do, or how can it be done better.

- Question-do we want feedback on old rule? Response-it's fine to reflect on past plans. USFS is starting over from scratch but we want people to tell us what works or what you like or don't like in past rules.
- One attendee noted a lack of local or state government participants attending and felt it was because USFS was not "used to talking with us".
- Attendee involved with contracting for scientific studies stated the need ensure objective science (captured in bullet above) and sometimes the science answer is crafted or provided to fit what the customer wants. "We need real science in policy."
- All access—keep all lands accessible. Is this a way to build more roads? Response—example-NPS tried to "shut down" the Everglades using Clean Water Act. Concern was this could be done using Designated Wilderness Areas—areas can be accessed in various ways (leave this to the planning unit) but continue to have public access. "Just write it into the planning rule and don't assume it's there." Question about research on forests—fencing out forest areas for restoration and research and the need to exclude these areas for scientific purposes for short term need; discussion was one must be cautious when writing a statement into the rule in that the definition could be difficult [to interpret]. Response-without getting into specifics this can be done-statement written in [and still retain research, special exceptions/uses]. Attendee doesn't want Designated Wilderness Areas to exclude people.
- Question—in reference to siting of wind farms on NFS lands—is there a USFS national policy? Response-we know one is written but do not know if it is signed. Attendee response-there is a real need for this policy.
- The Forest Service should approach the rule from the perspective of a conservation agency with a responsibility to the people of tomorrow, as much as to the people of today. The rule should require national forests to assess the carrying capacity of their forests before determining the extent to which, and how, to appease social needs and wants from the forest. If we don't know the carrying capacity, and what it takes to sustain the resource base, future generations will lose options associated with the resources here today.
- The rule should have a conservation focus; forest planners will need to be able to tinker to get the balance of different forest uses right, but the rule should protect resource integrity so that we don't lose any of the parts that the planners are tinkering with.
- The planning rule should delegate decision authority to the lowest level possible (e.g., the forest level).
- Use science-based techniques to preserve, protect, and restore indigenous species in indicated ecosystems throughout the lands managed by the US Forest Service.
- The planning rule should place importance on science. It is critical that science informs the decision.
- Social science is essential to the planning process.
- Ecological needs should drive management decisions; management should be a tool, not an objective.
- Keep the 1982 management prescription requirement, but consider its linkage with an adaptive management process.
- The Forest Service's current approach to cumulative impacts analysis is insufficient. It currently is done for each land unit in each place, which is not really cumulative. The agency needs better tools and a better approach for cumulative impact analysis.

- The planning rule should recognize that forest plans embody decisions, and thus require standards to guide decision-making.
- There is a quandary about how prescriptive the rule should be. The rule should be prescriptive enough to allow for programmatic consultation with the US Fish and Wildlife Service, and the rule should be consistent with the 2000 MOU between the US Forest Service, US Fish and Wildlife Service, and National Marine Fisheries Service.
- We need to put the definition of "restoration" into the rule. Correct bad past practices, such as thinning out tulip popular stands.
- The rule should require forest plans to include place-based restoration (e.g., restoration objectives and outcomes).
- The rule should contain a definition of restoration that encompasses the varying realities of different regions; restoration needs to be looked at in the context of local physical land and social conditions.
- The rule should make a distinction between restoration, enhancement, and maintenance. Each should be defined in the rule. (In the case of the Uharrie plan for habitat management, we started with ecosystem needs, and then defined the forest. Restoration followed, and the social context fell into place).
- The planning rule should not define restoration, but allow for its definition at multiple levels (e.g., for forest plans, for regions, etc.). The rule should provide a process for that to take place.
- The rule should require plans to include a component on meeting the challenge of climate change.
- The agency should take a regional approach to analyzing climate change impacts, and then use that information to downscale to forest plan revisions.
- The national planning rule should situate forest plans in a nested, multi-scale planning framework. This means taking a national, regional, and landscape level look at how the forest fits into its context in terms of landscape change and resource use. On one planning unit that is flat, we have parameters for erosion (e.g., hydrology protection requirements, slope considerations, and other environmental factors) that were developed on western mountains sides. Thus, we are left with requirements to consider things that are meaningless because our erosion parameters weren't developed for our context. Such considerations should be identified locally, but in a landscape context.
- The Forest Service should utilize available landscape-scale assessments and analyses such as the Resource Protection Act (RPA) Assessment. The key thing is simply to identify the references you are using in this landscape framework; it is not always necessary for the US Forest Service to develop the assessments; it can use the ones that are out there.
- The planning rule should ensure that Forest Service planners consider:
    - At the national level, the large-scale drivers of resource use and landscape changes that affect forest health and sustainability;
    - At the regional level, assessments of ecological systems, natural communities, and species representative of the eco-region that address where the forest plan fits into the bigger picture; and
    - Landscape-level needs and strategies; and
    - An adaptive management process that "roll up" impacts to determine success.
- The rule should provide guidelines for corridor management for national scenic trails consistent with the National Trails System Act. It should provide guidelines for addressing corridor management associated with congressionally-designated natural or scenic areas.

- Plan for Forest Service lands as refugia (corridors) in the age of climate change.
- Exotic and invasive species – ensure that no species is willfully introduced on landscape until it is proven to be non hazardous
- Maintain species viability standard, build on 2000 rule tiered structure and require best efforts but adapt process for exceptions for recognizing factors beyond FS control.
- Acknowledge and value ecosystem services offered by Forest Service lands, and consider these in making planning decisions.
- Incorporate the value of ecosystem services into the Forest Service's economic analyses. The agency evaluates the money spent and the money coming in. It should also consider non-monetary values of the natural resources it manages.
- Allow the Forest Service to engage in market-based approaches to conservation, such as habitat markets, wetland banking, and water quality trading.
- The planning rule should allow the Forest Service to evaluate how the agency can function as the end destination for conservation projects, such as wetlands banks and habitat areas.
- Incorporate mechanisms that provide for social and economic inputs at a variety of spatial and temporal scales.
- There are so many users on the borders of the national forests and grasslands that some management scenarios could bankrupt forest resources by going too far in appeasing social demands. The Forest Service should look at what is there and how to sustain it first -- then dole out the rest to society as it is affordable. It is the scientific community who should assess what is there, and should continue to have a lot to say about what is portioned out. Social demand from our lands is increasing, and could result in taking more from the forest more than it has to give.
- With transparency and education, you get the social understanding of capacity.
- 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. Ecosystem restoration and forest health considerations should drive levels of management activities.
- Consideration of all forms of motorized and non-motorized recreation as a priority.
- Encourage development of comprehensive recreation management plans to address the user experience; discourage segmented use planning (separate plans for motorized recreation vs. equestrian use vs. bicycles vs. developed recreation vs. disbursed uses).
- We need a more integrated approach to dealing with recreation planning. It should be driven by desired landscape conditions.
- All social and recreational aspects of forest planning should be based on a scientific capacity analysis, so that we preserve options for future generations.
- When we did the southern Appalachian plans, it took 9 years. Both the leadership and participants came and went. We generated a lot of ideas, and some were really involved – especially in the area of science and social science. We need a planning rule that gives us a strategic approach to doing our planning revisions so that we can revise our plans in a timely manner, and not let the revision drag on for years at enormous cost.
- Because forest plans need to be adaptable, the planning rule should allow for an efficient plan amendment process (e.g., for use between plan revision cycles).
- Adaptive management must be driven by data and a transparent process, or else the plan loses meaning.
- Adaptive management must be driven by data and a transparent process.

- The rule should definitely mandate adaptive management.
- The rule should require forest plans to identify triggers that would require the plan to be revisited. The trigger should include a threshold and a range. Once the threshold is crossed, the plan must be revisited to see if action is necessary. The planning rule needs to address multiple types of adaptive management for different levels of activity.
- The essence of the forest is the (ecological) "matrix," and the plan should identify important indicators of matrix health; if these indicators are ok, then everything is okay. The Forest Service is not using enough in-depth indicators to ensure that the matrix is okay.
- The rule should ensure that each national forest has a system for monitoring the forest to ensure continued resource viability. This system should prevent cumulative impacts that lead to an ecosystem beginning to fall apart.
- The planning rule should require that outcome measurements are developed and used in monitoring forest plan implementation.
- There are different ways to conduct adaptive management – some more rigorous than others. The Forest Service should 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 of rigor are important in other aspects.
- Responsible officials are encouraged to develop and implement collaborative action plans for forest plan revision. These plans themselves should be developed and implemented collaboratively.
- The collaborative process should involve the public throughout all critical phases of the planning process: defining desired conditions, identifying suitability of areas, developing strategies to achieve desired conditions, developing standards, monitoring and adapting plans as necessary.
- The planning rule should indicate that, at the outset of the planning process, the US Forest Service should develop an action plan guiding public input into the planning process (e.g., a process design or roadmap for the collaborative component of the planning process). If not actually in the planning rule, then the need for such a collaboration roadmap should be part of the planning rule package – i.e., maybe found in an associated manual or handbook.) The collaboration roadmap should itself be developed collaboratively.
- The planning rule should address the following questions related to collaboration: How do we handle situations where the US Forest Service wants to collaborate, but some or all stakeholders do not want to? How do we handle the fact that "collaboration" means different things to different people?
- The planning rule should explicitly mandate that public collaboration needs to be part of the planning process.
- Emphasize collaboratively-defined desired landscape conditions at various scales.
- The Rule should evidence a nested approach to planning where the National Forest Plan plays a contributory role in landscape-scale and eco-region scaled goals.
- As noted under the "at risk species" question, the rule should require plans to protect species viability, factoring in variables beyond Forest Service control.

APPENDIX C:

LIST OF COMMENTS FROM AFTERNOON SMALL GROUP DISCUSSIONS ("Input on Principles That Should Underlie the New National Planning Rule")

Substantive Principle 1: Land management plans could address the need for restoration and conservation to enhance the resilience of ecosystems to a variety of threats.
Substantive Principle 2: Plans could proactively address climate change through monitoring, mitigation, and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information.
Substantive Principle 3: Land management plans could emphasize maintenance and restoration of watershed health, and could protect and enhance America's water resources.

Substantive Principle 1: Land management plans could address the need for restoration and conservation to enhance the resilience of ecosystems to a variety of threats.

- Vegetation Management plans should use the restoration definition from the Forest Service Manual and Society of Ecological Restoration.
- The rule should define ecological restoration in broad terms, and then identify the process by which it should be more specifically defined locally (e.g., restoration goals should be defined at the forest level).
- The planning rule should identify restoration priorities for the planning process.
- Restoration goals should clearly identify what you want your forest to look like.
- The planning rule should codify the definition of restoration that the Forest Service has already developed.
- The planning rule should require that plans define the reference conditions for restoration; the best existing native communities are appropriate to use as reference conditions.
- The planning rule should set a restoration goal of having forest and grasslands that are diverse in structure and function in perpetuity.
- The only restoration appropriate for national forest is ecological restoration.
- A suggested definition of restoration is "the process of assisting the recovery of an ecosystem that has been destroyed or degraded or damaged."
- The national planning rule should aim for ecological sustainability by maintaining the composition, structure, and process of an ecological system.
- The planning rule should define the intent of restoration and conservation. Individual units should establish specific goals.
- Return the fire cycle to appropriate portions of the landscape; do not burn indiscriminately across the landscape.
- Restoration should be guided by an objective (e.g., species diversity) rather than a past reference point condition.
- The planning rule should recognize that while restoration of a specific community/condition may be the objective on one area, it may not be the primary objective everywhere. Don't assume that all lands will be managed for restoration.
- The planning rule should allow the forest plans to specify ecological communities and restoration needs, desired future conditions and definitions.
- It is often unclear to what end restoration is being undertaken. Objectives are better stated in other terms, at least in some cases.
- Climate change uncertainty is not a reason not to act.

- Because climate change is at a broad scale, it must be incorporated into the rule -- institutionalized.
- The planning rule needs to reflect current science while allowing flexibility to evolve as science evolves without having to issue a new planning rule.
- Stakeholders, science, and monitoring are all required to be able to see if you have achieved what you said you wanted to accomplish on a forest.
- Take into account the non-static nature of systems and the need to address disturbance regimes across boundaries. Require collaboration between state and private research branches of the agency. Their action plans should be working toward the same goals.

<u>Substantive Principle 2</u>: Plans could proactively address climate change through monitoring, mitigation, and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information.

- The planning rule could direct that each forest establish a restoration team consisting of federal, state, and local governments and NGOs to develop restoration goals and implementation partnerships for that forest.
- There should be no biomass harvest for energy production on forest lands. I am very concerned about creating a new, but unsustainable market in biomass harvest for energy on the national forests.
- Biomass harvest for energy production may be the only way some forests can accomplish some of their restoration goals.
- If biomass harvest is done to accomplish a restoration goal, rather than to develop a market, it might be more acceptable. However, even then, some would be very worried about this contributing to the development of an unsustainable market.
- To properly position forests in the context of climate change, maintain a diversity of composition and structure across landscapes.
- Each forest needs to create a carbon budget.
- For any National Forest products sold for fuel, USFS should first calculate the life cycle carbon footprint of these products and only sell products with a positive net carbon footprint reduction.
- Address climate change by conserving geophysical stage, enhancing regional connectivity, and sustaining social-ecological systems and functions. These are already well documented and implemented conservation practices.
- Focus on adaptation to climate change at the forest level. The available science is currently limited to models of effects on broader regional and sub-regional levels. We need to be able to understand climate change effects on a small forest / land base area.
- The USFS climate change adaptation approach should be managed at the local level due to differences in forests by regional context.
- Given the often controversial nature of discussions over climate change, this should be addressed in forest plans as a potential liability, and managed through monitoring, adaptation, and mitigation. This potential liability needs to be addressed regardless of whether a consensus can be reached on the causes and impacts associated with climate change.
- The effects of climate change are so uncertain that, while it should be considered, it is premature to “proactively” address climate change in forest plans.
- The effects of climate change will be the same whether it is man-induced or natural climate change; species will change; new ones will move in and old ones may move out. We should

be able to allow ecosystems or landscapes to evolve and adapt to them. Maintaining native ecosystems is just "choosing a point in time." Should we continue to value this particular set of ecosystems and not value what ecosystems might emerge in the future?

- There is consensus in the scientific community that climate change is happening, but a lot of uncertainty about what it will mean; however, the uncertainty can be addressed through scenario-based planning.
- Maybe it would be more widely acceptable to address climate change as one of numerous kinds of "disturbance events," including both human-caused and natural events (e.g., ice storms, beetle infestation, fire, etc.).
- Disturbance events and climate change often occur at different time scales and make for different outcomes; we should recognize this and be careful about combining them.
- We can take climate change into consideration in some aspects, such as extreme events. We know it is coming, so we should plan for it, either adapting or mitigating for floods and droughts.
- We can address climate change by incorporating into plans well recognized conservation practices such as larger level assessment, corridors, connections, protecting drought tolerant species, and planning for extreme events.
- Plans should acknowledge the variability in local climate conditions and allow for flexibility in management strategies. For example, we can leave alone what is resilient to change, and focus on what needs to be changed in order for the ecosystem to be resilient.
- The planning rule should provide for a diversity of habitat across landscapes to make them more resilient to climate change.
- The rule should not require plans to address a particular threat (e.g., climate change) instead, it should require a collaborative process, informed by science, to define the threats that the individual forest does need to address.
- The planning rule should define what "science" is so that the results are objective.
- Managing for adaptation needs to focus on four areas: 1) don't exacerbate existing system stressors; enhance resiliency (function; processes, etc.); prepare for uncertainty using redundancy; continually adapt and refine your tools and monitoring.
- The planning rule should be adaptive to the science and state of knowledge with respect to climate change.
- The need for a solid framework to connect forests to allow for species migration and movements - consider eliminating the islands of extinction.
- The planning rule should allow for adaptation as time passes, and knowledge develops; it needs to support planners in changing direction as we learn more.

Comments That Participants Felt Applied to <u>Substantive Principles 1, 2, and 3</u>: (the "restoration," "climate change," and "watershed" principles).

- The rule should direct individual forests to develop timeframes for plan implementation.
- The rule should enable adaptability based on observations and monitoring data. Plans could be required to identify science-based trigger points that would indicate the need to revise the plan.
- The planning rule should create consistency in standards.
- The planning rule should allow for commoditization of uses for which there is currently no charge (e.g., recreation and water); these all cost the Forest Service to maintain and the national forests may want to require fees to supply these inherent public items to the public who utilizes them.

- Focus on promoting appropriate ecosystems, using local genotypes.
- All three of these principles should be incorporated into the rule.
- The planning rule should call for early involvement and joint planning with other agencies, both state and federal, and with the scientific community to take advantage of all this expertise.
- Consider recreation opportunities in implementing all three of these principles; if they are not considered at every step, they are often overlooked.
- The 2005 and 2008 rules both provided for ecological sustainability; this should not be lost in the new rule. How can we do better?
- The rule should require plans to identify the overall goals of the plan and strategic options for achieving those goals. The forest plan should be the tactics for achieving those strategic goals.
- The forest plan should consider key societal goals.
- Meeting the needs and expectations of the public for quality recreation requires more than simply managing a healthy forest.
- Providing a variety of recreation necessitates a conscious choice of how healthy and resilient the forest should be. This informs how lands and land uses are allocated. These decisions must be part of a strategic land management plan.
- The Osceola National Forest is using some really good tools for landscape scale assessment and characterizing ecological conditions, as well as suitability models. These are helpful in setting forest management priorities and developing implementation strategies. The planning rule should require the use of mid level planning exercises for identifying local tactics for meeting forest plan objectives.
- The planning rule should require that conditions that are most out of sync be addressed first, to improve its ability to meet objectives of watershed health, climate change adaptation, and ecological restoration.
- Forest plans should address ecological priorities, including restoration, watershed health, and resilience in the face of climate change (including NNIS, climate change, expanding urban/rural interface) in an integrated manner with clear objectives.
- Restoration and preservation seem inconsistent with sustainable use of forest resources. Isn't the USFS supposed to focus on sustainable use? We shouldn't be trying to revert back to forest conditions at the time of pre-human use.
- Watersheds are the appropriate scale for planning, including assessment, analysis, and evaluating outcomes.
- Leaving land and water alone will go a long way toward restoration, climate change adaptation, ecosystem stability, and watershed health. Large portions of the forest should not be managed. We do not need to use all of the forest. Keep users of all kinds out of some parts. There is no way that multi-use areas will be able to sustain life as it was meant to be. Wilderness should be left alone.
- Use principles of strategic habitat conservation planning.
- We need a new, landscape-scale social principle to guide the planning rule, covering minerals, private commodities, recreation, special uses and land rights.
- Provide clear guidance for working with communities on loss of green space. Early involvement during planning with other agencies (both state and federal) and the scientific community is needed to take advantage of their expertise in these areas.

<u>Substantive Principle 3</u>: Land management plans could emphasize maintenance and restoration of watershed health, and could protect and enhance America's water resources.

- The planning rule should consider fragmentation in the aquatic environment.
- Watershed health is a scale-dependant concept. The rule should allow for the forest to select an appropriate scale to assess watershed health (considering ownership pattern, resource conditions, and external pressures).
- The rule should mandate protection of watersheds through a well-defined monitoring system, which is based on an appropriate scale.
- The national planning rule should maintain necessary wetlands, refuges, and watershed integrity rules, while accommodating public access and recreational use.
- The planning rule should incorporate watershed scale planning; water and aquatic protection should be given more importance.
- The planning rule should require that watershed health be incorporated as part of the suite of restoration strategies employed.
- Watershed health should be the primary emphasis of the planning process. Watersheds are the appropriate scale for planning.
- Forest planning should be conducted in the context of cumulative watershed impacts.
- The rule should require forest plans to identify sustainable road systems and roads causing hydrologic problems.
- The planning rule should require forests to develop the minimum road system in order to protect water quality from road-related impacts. The forest plan should include objectives for road decommissioning; these objectives should be made into items for which line officers are accountable.
- The planning rule should require forests to conduct a full inventory of roads and of aquatic barriers prior to plan development.
- The USFS should identify human communities that are dependent on forest service watersheds and incorporate their needs and plans into forest planning.
- There should be public oversight and education of watershed impacts on and off USFS lands; provisions for this should be included in forest plans.
- Consideration should be given to how a forest plan fits with the Clean Water Act (CWA) and with the guidelines of other agencies such as state agencies responsible for implementing the CWA. The agencies should explore ways of working together to protect watershed health. The planning rule should identify these relationships and encourage inter-agency collaboration on water quality protection as a critical component of forest planning policies.
- To really make progress in dealing with impaired waters, you really need to employ an all lands approach. The planning rule should require the all lands approach for addressing watershed health.

<u>Substantive Principle 4</u>: Plans could provide for the diversity of species and wildlife habitat.

- Promotion of suitable habitat for a diversity of species should be in conjunction with state, local and private land management activities.
- Protection of the species should look at landscape availability of habitat as a percentage of the land base.
- Plans should be developed in a way to contribute to landscape scale and eco-regional goals. Forest can recognize its place in restoration within a regional context and recognize contributions of surrounding lands and plans. Provide for a landscape scale, nested approach that FS could contribute to through forest planning and on to a national level and higher

goals.

- Forest plans should emphasis forest structure and uneven age and recognize a diversity of wildlife habitats appropriate to forest types and specific forest communities and not narrowly focus to just few species.
- Species diversity should not focus on only indicator species but a diversity of species.
- Provide interpretation of "wildlife", "habitat", and "species" and needs at a high scale and broadly inclusive to ensure the functionality of systems.
- Assessment of species and system needs should occur at a higher scale, i.e., eco-region or landscape scale. Forest plans should be developed to support the role of that National Forest in meeting those landscape goals.
- Planning process should determine and put into the planning rule a reasonable collaborative process informed by science to determine what species and habitats "we" want more of, less of and what to maintain.
- FS needs to assemble committee of scientist (e.g., such as in 1999) to synthesize best available science in population assessments. Viability science needs to be updated.
- Viability concerns in planning rule should focus on rare, restricted, and specialized species *[note: also stated as rare, dispersed and specialized species]* and, most importantly, providing for connectivity and habitat for these species. Species range and connectivity of habitat within that range are more important than short term population trends. Forest Plans should maximize habitat connectivity for rare, dispersal limited species.
- Provide for lists of focal and target species that serve as indicator species that are vetted through scientific process.
- Rule should insure that plans are driven by the need to restore or maintain an appropriate range of species/habitat diversity, according to existing (or anticipated) conditions on the ground.
- Provide for definition, identification and utilization of target or indicator species to not include non-native species. Specifically, concern about non-native (and sometimes invasive) species being used as target or indicator species.
- Rule should address species diversity for Region but rule should indicate species diversity be applied to individual unit (forest boundary) as opposed to specific region or area, (e.g., Chattahoochee and Oconee NF should be separated for species diversity due to difference in habitat, etc)
- Promotion of species or habitat restrictions should not enjoin or restrict private land owners to manage their own land.
- Promotion of indigenous species should not negatively impact the economies of those regions.
- Plans should recognize economic value of existing ecosystem services.
- Require appropriate monitoring of actions and species potentially impacted in order to maintain viable populations. Plans should have monitoring appropriate to the proposed actions and projects and the species potentially impacted by those actions and projects in order to maintain to the extent reasonably possible viable populations of a diversity of plant and animal species and sustain their habitats.
- Monitoring should track the habitat objectives that are outlined by the vision section of the plan.
- The planning rule should outline how forest plans need to address species; species need to be conserved on an ecosystem based landscape scale through a Region 8 plan; the individual forest plans should be moving toward conservation.

- Forest plans should tier to forest service manual and handbook for monitoring of at risk species and should focus on a small number of high priority at risk species.
- Planning rule should address factors for habitat management for sustainability needs and count population trends on an annual basis.
- Provide for species diversity from long term perspective; currently scientific studies aren't long enough and long term trends are not being used.
- All plans should use population viability assessments (PVAs) for focal/target species. *Contact provided by: Ben Prater, ben@wildsouth.org*
- All plans should strive for ecological sustainability using biological indicators such as ecological integrity. *Contact provided by: Ben Prater, ben@wildsouth.org*
- All plans should protect, analyze and assess all intact (e.g., roadless) forest systems and connect these systems with corridors to allow for adaptation to climate change and to protect viability of meta-populations and gene flow. *Contact provided by: Ben Prater, ben@wildsouth.org*
- All plans must include rigorous and standardized mandatory programs across the entire forest landscape rather than just in the areas designated for management. *Contact provided by: Ben Prater, ben@wildsouth.org*
- All plans should implement "precautionary principle" to deal with uncertainty. *Contact provided by: Ben Prater, ben@wildsouth.org*
- Plan will encompass such a large and diverse area that this topic should require overall guidelines except for at-risk species of animals and plants. At-risk species must be defined.
- Plans should recognize/identify such at-risk species and make provision to improve habitat conditions through development of plan components that USFS has control/responsibility to effect positive change in their "negative" trends.
- When defining species diversity make basis of decision with consideration of human impact interaction.
- Define the period in history that "restoration" of wildlife species and habitat should be.
- Forest plans should provide for <u>sustainability</u> for all native communities that occur on forest landscapes, not just single species viability. Community could be glade, dry oak forest community, etc—use NatureServe ecological communities.
- Provide for adaptive management based on monitoring.
- Bring back community of scientists that are a standing group and are consulted throughout the process.
- Ensure planning process is adaptable to incorporate and use best available science.
- USFS should analyze and provide for diversity at as many different scales as can be feasibly accomplished with the funds and time set forth.
- Mapping plant communities and habitats in national forests should be a starting point to the forest plan and use these to inform plan rather than planning by compartment and stand. Past plans proceeded from stand and compartment data and this was not a good approach. Instead use communities that are mapped to NatureServe standards, maybe not alliance level but appropriate level. *Contact info by: J.P. Schmidt, School of Ecology, UGA*
- Develop management objectives for species and communities or habitats. *Contact info by: J.P. Schmidt, School of Ecology, UGA*
- Build in monitoring to assure success of management in meeting stated objective. *Contact info by: J.P. Schmidt, School of Ecology, UGA*
- Provide for landscape scale for eco-diversity defined as minimum at native communities and maximum at Forest.

- Rule should not over commit Forest Plans to monitoring that it can't practically accomplish.
- Rule should provide for placing more emphasis on utilizing other non-FS data sets and efforts (e.g., FWS, Natural Heritage, other existing ecological mapping and monitoring data.)
- Rule should instruct forest plans to identify at various scales, missing ecological elements, e.g., species, processes, and try to restore them. Broaden focus from single species. Can have keystone species play the role they used to play. Not enough to just identify the species.
    - Discussion about species, population or communities across what scale and what does this mean.
    - Combination of community monitoring and focal species monitoring but mainly community monitoring of a focal species.
- Provide for cost consideration when planning for sustaining species. In former rules it was sustaining all species that occur on national forests and sometimes that doesn't make sense due to shifting and climate change. Due to limited funding, must look at how species are changing and how they're on the landscape.
- Consider climate change and other changing factors on full range of species. Do not use single species management, except when required by law.
- Rule does not need to reiterate other federal laws, ESA, Clean Water Act, etc.
- Encourage use of existing monitoring/community classification data where it exists. However, there should be clear standards in place to ensure that pre-existing data is collected and used consistently.
- Concern and disagreement with above statement: Rule should direct we look at how to use pre-existing data but not set national standards and protocols due to concern of uneven playing field and that some forests [management activities] could be "brought to a halt".
- Ensure we monitor things we need; monitoring should be targetable and measureable. Monitoring is currently set up to understand things instead of putting money on the ground; ensure we don't over monitor.
- Ensure way to know if stated objectives are being met. Currently we have no method to determine if management activities are working (e.g., using fire to improve wildlife habitat but have no target, objective and no measure of whether objective is being met.)
- Define the concept of diversity and diversity of age classes of stands, which is currently problematic.
- Provide for a hands-off approach to species diversity. Keep people, motorized vehicles, cows and horses and other domesticated animals away from large tracts of land, don't pull out and move plants, we need some <u>un</u>managed land to allow for species diversity, natural evolution, health of air, water, and land. We do not have enough knowledge to manage these—let wilderness be that! If people want/need to use parts of the forest, leave that area on the edge, near where people live, and leave the more central areas <u>alone</u>-this would include roads.
- Planning rule should allow for species and communities to evolve (even accepting new species that move in and allowing some to go extinct) in light of the way species and communities will need to adapt to climate change.
- Provide for population viability assessment using focal species and target species.
- Provide for and ensure effective monitoring.
- Include the "precautionary principle."
- Provide for protection of intact ecosystems for wildlife/species protection and migration and to ensure adaptability in face of climate change.
- Provide for carbon storage for climate change.

- Promote native species, wildlife and vegetation, at landscape scale based on ecological communities.
- Provide for removal of non-native invasive species.
- Provide for habitat diversity from early successional to old growth.
- Do not include MIS as viability indicator; they are not good indicators of healthy habitats.
- Who owns the benefits from the genetic resources of a particular area, for example, a species is found that has economic/medical benefits to society, like yew and taxol). Does the local community benefit?
- Biodiversity conservation should be a goal, especially in the face of climate change. What level of importance is given to conserving biodiversity of the forest?
- How can we reach a point of accepting these non-natives as part of the community? Instead of spending millions of dollars controlling/eradicating, can we permit some vegetative communities to evolve? It may mean a change in the structure and composition of vegetative communities. Can we accept these aliens?
- Should provide for more attention in determining what the ecosystem could be and currently is. After establishing this, have an appropriate management plan to restore ecosystem and see what comes in with minimum disturbance. Follow rigorous plan to determine what the ecosystem actually seems to be. Target management plan to allow ecosystem to come in. Example: plant communities are defined today on FS land, surveyor does an inventory and most of forest land is degraded and what surveyor finds may have little or nothing to do with what should be there.
- Provide guidance on what exactly is adequate I&M; consider an inventory program similar to NPS I&M. Document what is there comprehensively then use the data to develop baseline conditions and monitoring protocols. Recognize what should be there but this isn't as important as what is actually there.
- Should not prescribe protocol and methodology for I&M; don't tie hands since science is always advancing.
- Plan should recognize and provide management strategy for the protection from factors that threaten species diversity (insect, disease, invasives, etc)
- Habitat as proxy for species population monitoring, trends, as well as diversity should have limited (at best) role. It is not precise and narrows down monitoring obligations and species data to the point of irrelevancy.
- Should emphasize habitat/ecosystem management vs. single species management, but with some exceptions: when a species is so imperiled and depends solely on a Forest then considerations to single species management is appropriate.
- Consider recreation components in how decisions affect recreation opportunities and how recreation impacts wildlife and plant management.
- Should emphasis strategic over tactical.
- Identify desired future conditions (DFC) based on best available science/data, i.e., potential natural vegetative types (PNVT), ecological classification system (ECS).
- Need a balance on guidance to point toward one solution or another.
- Ensure the use of a collaborative process that is deliberative, iterative, and rational.
- Assess diversity and habitat status utilizing guild system "groups of like species."
- Manage for the companion species/co-members of guilds and not individual species.
- Species diversity is just a component of healthy ecosystem—recognizing where you were in successional stage of vegetative component and where you want to go. All tied together, all connected. Recognize current successional stage and look at overall Desired Conditions.

- Desired Condition is never what it was in the past.
- Species viability and species diversity are big questions along with how to do species monitoring. Scientists say we can use DNA to monitor species. Do you think we could do this, i.e., use DNA as part of monitoring? Response: It is desirable if after everything else is done, it's affordable because then you can actually determine different ecosystems. Response: DNA knowledge is much less expensive than it was previously. An example of protocol for collecting DNA monitoring is to collect hair, etc from areas to determine what is the occupying area.
- Some attendees uncomfortable with questions on blue sheet (listed at top of this page) because they imply we're looking for tactical, prescriptive answer. We need a strategic rule.
- Should affirm biodiversity on an overall goal but leave flexibility for regional/district unit plans. Implementing measureable targets or goals should be local.
- Should not specify if the plans are for species vs. community management for diversity, the individual plans should be able to make that decision using best available knowledge on the local communities.
- Should commit agency to use good science and best available science, and continue to conduct meaningful monitoring and evaluation to have what is needed to manage for ecosystem resilience.
- Recognize that greater species diversity guarantees a healthy environment and should therefore be considered of paramount concern. This concept should in no way imply that one species ought to be given exclusive right over another species, unless the target species is non-native.
- Should ensure the use of adaptive management plans and incorporate a clear process for adapting to new information to meet the needs of species and their habitats.
- Species diversity should be only one of many planning considerations and not over emphasized.
- Should employ a coarse filter fine filter approach and the need to do both at temporal and spatial scales, i.e., look at systems and then individual species. The Southern Region's Ecological Sustainability Evaluation (ESE) tool, and The Nature Conservancy CAP, are time tested and make sense for sustaining diversity.
- Encourage volunteers for inventory and monitoring efforts; establish relationships with citizen groups, and provide tools and training and facilitate reporting.
- Encourage (and possibly train) volunteer service providers to handle basic field monitoring and detection to identify and report species depletion.
- Emphasize native species (pre-European settlement) but also allow for use of appropriate non-native species.
- Provide for migration corridors.
- Focus on strategic items and not specific management (tactical).
- Rule should recognize the unique diversity of species and capacity of forests and grasslands to support species and establish flexibility for a forest to design a diversity structure suited to species/resource conditions/known science/capabilities of a forest or grassland.
- Rule should <u>not</u> dictate "how" to manage for species or habitat diversity.
- Take advantage of new monitoring approaches for individual species looking at habitat range and genetic diversity, etc.
- Provide guidance and clarity on how to measure for species viability.
- Rules should be by individual unit/watershed area because of the differences of each area.
- Leverage and protect cooperative investments made by private groups--volunteerism.

- Ensure and recognize the need for monitoring using a science based approach and best science to inform management actions.
- Ensure Forest Plans are written so management actions do not contribute to loss of native species diversity.
- Maintain species viability standard, build on 2000 rule tiered structure and require best efforts but adapt process for exceptions for recognizing factors beyond FS control.
- Ensure the utilization of best science and monitoring and evaluation-these three things provide for managing for ecosystem resilience and species viability.
- Ensure the use of science is deliverable, not just accurate and ideologically correct, it must be deliverable.
- Ensure the needs of technology, people and funding for on the ground implementation of forest plan are met.
- Should not use MIS.
- Should plan at the USFS Regional level for priority areas for high priority species, e.g., Eastern Brook Trout Joint Venture.
- Should ensure proper land management. One of the biggest threats to resources is that resources aren't managed on national forests. Lack of management can be greater threat than management.
- Ensure good communication with internal and external groups, e.g., Tellico-built campground and then closed OHV area so it's not used.
- Ensure proper management to combat the outbreak of insects.
- Give expert attention to species that FS has greater proportion of habitat, look beyond forest boundaries for management and recovery.

Substantive Principle 5: Plans could foster sustainable NFS lands and their contribution to vibrant rural economies.

- How is vibrant defined? Does it mean sustainable? Is it something that betters the community? Need more sustainable resources (not just boom and bust cycles of resources extraction). Community and Forest Service should work together.
- The community should contribute to the forest; the forest does not need to contribute to the community. The forest does not owe the people anything.
- There is a reciprocal relationship between forests and community. The forest gives water, recreation, and resources. People provide the tax dollars that support the Agency that manages the forest.
- Plan should consider how implementation will affect local economies
- Provide clear language about the outputs from local forest.
- Clear on likely activities so that citizens can understand them and project what will happen in the future.
- If people understood the possibilities (e.g., the processes for permitting) they could use the forest more effectively
- Need to preserve culture and history. Many people made their living off the land and want to generally respect that.
- Provide authorities for USFS to engage in and value ecosystem services. Ecosystem services directly tie to local economies (e.g., value of the water in the forest). Rule needs to be explicit in what "ecosystem services" and "social sustainability" mean.
- May use the language "local economy" instead of "rural economy"

- Need buy-in from local communities. Need to show the benefit the community gets from the forest. If the community is a good steward, they get benefits from the forest.
- Preference to long-term sustainable timber
- Rule should direct the planning process to identify the services and the value of these services. Need to look at all services that a forest provides.
- Consider value of animals, scenery, habitat, trees, water
- Social impacts are significant. Consider how it affects private lands. need to consider this for timber harvesting.
- Incorporate mechanisms that provide for social and economic inputs at a variety of spatial and temporal scales.
- Strengthen ties between USFS Federal, state, and private branches
- Ensure input from local communities is taken seriously. Make the input process accessible to non-technical and non-scientist people. Ensure a collaborative process.
- Clarify the forest outputs so that local entrepreneurs can make use of that information if they would like to
- Need buy-in from local and state governments in order to be successful
- Want to add to question one "that contribute to economies, *cultures, and customs*" to provision of goods and services. Want to use this language to ensure people know it's about more than resource extraction.
- Can be a hierarchy in the rule when looking at the interdependency of social, economic, and ecological systems. Want to focus on ecology first. More important what we leave on the land than what we take off of it.
- While locals should have input, remember that these forests belong to every American citizen. Every American has the right to contribute to the planning.
- Consider recreation and volunteerism as some of the services provided by the forests. Use ecotourism to develop this.
- Proactively build relationships with advocacy groups and locals.
- Extractive uses (e.g., timber) must have realistic sideboards to avoid boom/bust cycles typical in National Forest surrounded and dependent communities.
- Do not change plans mid-stream. i.e., when groups supply materials, equipment, labor, to do some mitigation to help manage the forest – should not then be excluded from forest activities later.
- Rule should include all forms of recreation in a collaborative effort but also consider the interdependency.
- Need comprehensive recreation management plans addressing all user groups and resource needs. Volunteers are a user group.
- Have pre-implementation appeals process for those stakeholders that have been involved in planning. Planning rule should collaborate with proactive volunteer groups. Call groups to get their input before making a plan.
- Do not want silos. Need to think about all stakeholder groups and how they work together. The default should be to include as many groups as possible. Then if you do have to exclude a group for a particular reason, can do that (e.g., don't immediately start off with a single user trail. First approach would be to create a multi use trail to attract more tourism).
- For rural communities, would like to see timbering decisions made in consideration with other forest goals, so that timbering is not just a boon to the local economy but so it is a benefit to the forest to implement other goals. Planning rule can say when developing maps or timber harvest plans need to look at multiple objectives at the same time.

- Acknowledge that science based ecosystem management contributes to vibrant rural economies. If you have a healthy ecosystem that promotes ecotourism, the process of restoration maintenance and enhancement.
- Consider non-traditional markets e.g., carbon, biomass and biofuels.
- Acknowledge that comprehensive recreation planning and public service opportunities support vibrant communities. All recreational users interact. Our plans for their use on the forest need to interact as well. Educate people on "leave no trace behind" policies to ensure future recreaters have an equally enjoyable recreational experience.
- Look at federal and state lands comprehensively.
- May need collaborative recreational planning teams from the agencies.
- Emphasize the "service" part of the Forest Service. Should not be operating as a business. Need to consider the social and historical impacts before we close down trails because they are not profitable. Need a balance between service and economics. Want something in the rule that emphasizes the service that the Forest Service is responsible for. Need to serve the public of today and the public that will be there tomorrow.
- If we do what we want to do with restoration, it is very labor-intensive. There is an opportunity to serve the community and forest by developing a formal training to employ local workers to restore the forest.
- National Forests have small impacts statewide, but may have a large impact on the local community. Highlight the scale of the economic impact. Local economies can in some ways be in conflict with forest needs. A successful forest plans considers local economies and examines the value of the forest for the local economy.
- The plan should discourage a single industry economy.
- Recognize multiple use principles including consumptive and non-consumptive uses.
- Plans must assess impacts of alternatives on the local economy. look to local economic development plans and tourism plans (e.g., WNC Heritage Tourism Plans) to understand the future of local economies, that way the USFS does not have to guess what is happening locally.
- Sustainable uses should be incorporated in forest plan.
- Make decisions based on the resources availability and sustainability. Consider the local economy, but recognize it is outside the scope of USFS to encourage or discourage a certain type of economy.
- Decide what geographical or influence area you are looking at.
- Analysis of non-market resources (e.g., natural amenities attract residents, wildlife recreation of hunting and fishing, fishing and hunting guides, clean water, scenic, soil retention, climate regulation and carbon sink).
- Encourage state, county, and city land swaps. Specify standards for incorporating land adjustments.
- Want flexibility to sell or trade non-manageable small tracts of land that have lost their economic character. For instance, when a road is relocated, it can create slivers of land with little economic value.
- Keep USFS economy in local economy (Congress issue). This can be done with stewardship contracting or stewardship sales. Consider new technologies that can lead to new jobs.
- Identify non-traditional forestry jobs that are necessary to implement the plan.
- Let the capital market take place. If we write a good plan, the economy will build on its own.
- What is rural?
- All plans should work to create a stable business environment.
- All plans should include local leaders in deciding goods and services provided.

- Give attention to contribution of ecosystem services (e.g., carbon sequestration, drinking water, fire protection) and potentially determine their value to local economy.
- Require plans to set thresholds for economic sustainability based on ecological sustainability. Need to strike a balance between economic and ecological outcomes.
- Economic benefits of enhanced ecosystem services through ecological restoration (e.g., jobs for restoration, value added by enhancing wildlife)
- Recreation and forest products need their own principles so they are not consumed within this rural economies topic.
- analyze what the current largest economic drivers are
- Can be addressed through collaborate processes – priorities and drivers.
- Plans should include local leaders to determine what good and services are provided.
- Disdain for the term "multiple use." Instead talk about "values" so that people do not need to defend their individual uses, but can focus on their values. People may have the same value for the land even if they use it in different ways. The term "multiple use" used to have a more narrow meaning (e.g., one trail for hiking, biking, and off road vehicles) which may be more appropriate. This term has taken on a new meaning. It should not mean everyone gets to do what they want everywhere.
- Monitor economic metrics to determine the effects of the rule.
- Local stakeholders should be able to offer solutions to help keep the multi-use trails sustainable. Should be able to provide input in addition to their national input.
- The "rural economies" principle deals with conflicts. When you talk about economies, you talk about people's livelihoods and it becomes emotional. Rule can provide direction on how to foster collaboration and conflict resolution. It may be a good place to highlight demonstrations.
- Our lands are living laboratories that provide a value.
- Need a discussion of boundaries – geographical, political, and economic. Use a geographic boundary as a standard unit of analysis. Economies could be in very different areas.
- Capture economic, political, and social data with GIS.
- Sustainability science as it is defined today should drive the plan. The local economy should not drive the National Planning Rule. If a collaboration identifies timber production to be a high priority in a forest to support the local economy or is wilderness areas are found to be a high priority, the Rule has to be flexible to allow both, and not require both.
- Most of our natural resources are renewable and we need people in these rural communities to be able to make a living through work such as logging, outfitter guides and forest products. Young people need to be connected to the land by hunting, recreation, etc.
- USFS has the opportunity and obligation to help create and sustain markets for National Forest dependent communities, especially restoration by-products and small diameter timber, in order to help seed new and sustainable industries.
- Need to decide whether humans are part of the ecosystem or outside the ecosystem.
- While USFS decisions can adversely affect local communities, the Rule should indicate that all efforts to do the best possible to mitigate those consequences can be bad.
- USFS must find a way to recognize the "capital" both gained and lost by National Forest dependent communities.
- Estimate the number of traditional jobs (e.g., logging, mills and road construction) that the forest plan will sustainably support.
- Passive values such as solitude in recreation need to be a part of analysis along with ecosystem service, recreation, environmental education and tourism.

- Apply a long-term sustained yield analysis to recreation and social resources. This capacity analysis should project 30, 50 and 100 years into the future in order to recognize changing local economies.
- 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. Ecosystem restoration and forest health considerations should drive levels of management activities.
- Explore avenues to support and manage rural enterprises so as to market non-traditional services for the economic benefit of the local area (e.g., whitewater river recreation, planting wildflowers in meadows to help local bee keepers and herbalists).
- Create license processes to engender small cottage industries for slim job markets.
- The provision of goods and services should not be marginalized under the guise of "supporting vibrant rural economies." Outdoor recreation and forest products need their own principle.
- This principle should be morphed. It marginalizes timber and outdoor recreation, yet they are the biggest management challenges we have.
- Develop long-term program for sustainable production of high-value timber that gives preference to local or small scale operations.
- Ensure harvesting also contributes to other forest goals such as wildfire habitat and forest health. Trees should not be cut just for the sake of cutting, but instead we should find mutual gains.
- Where consumptive goods are not sold due to legal issues, economies should be compensated.
- The Recreation Opportunity Spectrum (ROS) needs to be updated to clearly include all types of uses, including mountain bicycles.
- Collaborate with town boards, county commissions and local businesses.

Process Principle 1: Land management planning could involve effective and pro-active collaboration with the public.
Process Principle 2: Plans could incorporate an "all-lands" approach by considering the relationship between NFS lands and neighboring lands.
Process Principle 3: Plans could be based on the latest planning science and principles to achieve the best decisions possible.

Process Principle 1: Land management planning could involve effective and pro-active collaboration with the public.

- Forest planning initiative collaborative workshops, public meetings before scoping goes out.
- To create and publicize a well defined blue print for public input-try to gather a broad representation of user groups-tourism, businesses, users, etc. Use the internet –web steaming.
- Forest Service did not do a good job of collaboration in previous planning processes. Needs to be a different type of way for the FS to do collaboration so it doesn't pit interest groups against each other.
- Forests plans are required to specify how public participation will be encouraged in site specific projects.
- Find ways to incorporate more "Forest Service Users" than the regular bunch. Must answer questions of importance, publicity and outreach.

- Engage local stakeholders who may not be available for regional daytime meetings.
- Collaboration should extend through implementation into projects and special uses.
- Focusing amendment/revision process on specific tasks capitalizing on investments and lessons learned through forest planning and implementation.
- Utilize stakeholder groups for input that includes NGOs and the local communities.
- Recognize development of a forum for collaboration for existing local, state, regional, and applicable national plans in place-conservation plans, etc.
- Responsible officials are encouraged to develop and implement collaborative action plans for forest plan revision. These plans themselves should be developed and implemented collaboratively.
- Distinction needs to be made between opportunities for public comment and input of federal employees.
- Utilize established proven decision support tools considering analysis of alternatives (A of A), risk, tradeoffs, etc., to arrive at supportable decision.
- Forest plans are required to specify how public participation will be encouraged in the specific projects.
- To get all adjoining public landowners in a process in the beginning to establish joint efforts for land management needs.
- Requirements for collaboration must ensure a feedback loop for how information was used and this must also apply to this rule making process.
- Should exist within NEPA process but before during and after project implementation.
- Specific plan would identity ways to reach out to the public and involve them.
- Have collaboration both scientific and general forest users input on monitoring and evaluation reports. We need to have a dialogue around them. Need to disseminate info that is found.
- Use intra-agency approach. Use own models agency developed.
- Forest plans should designate management areas and actions allowable in them based on areas of broad public agreement consistent with the best available science.
- In the development of a plan revision, the FS should facilitate ongoing and regular communication and collaboration between national forests, staff, states, tribes and other agencies and the public and make all reasonable efforts to maintain and continue public collaboration during the plan's implementation.
- LMP must be reviewed at the regional/local level to access site specific issues and considerations.
- Plan development collaboration is key from beginning to early implementation to then amended plan. Consider opening up another comments or peer review period 7-10 years into the plan and if plan needs to be revised do so. Don't put plan collaboration on a timeline.
- Collaboration should be required but not forced. If people don't want to be involved then it shouldn't stop the process.
- Previous planning processes not effective.
- Opportunity for education. Forest Service planning speaks a different language. If we want the public wants to be engaged need to create buy-in. Need to establish, re-establish connections.
- Every time we get new rule, we get knew language the public doesn't understand.
- Appeals process and how to deal with it if the process doesn't work.

- Collaboration will involve public, throughout planning. Local will be scoped. Pre-decisional field trips. P1-Appeal process that is fair and time limited.
- Easy to understand language.
- Provide for early collaboration before decisions have been made.
- Encourage involvement of broad group of stakeholders.
- Change word could to shall.
- Needs to go beyond shall. MOUs in place, special treatment for stakeholders. Planning rules need to say it is FACA process. Decision documents signed by one person and not shared by anyone. They want more than input, they want influence. Rule would need to have clear and strong language to that effect.
- Needs accountability.
- Ways to institutionalize partnerships in planning process through a consortium or joint fact finding data collection. Not just act of creating new entity-how are we investing into what we just created through joint management objectives and to implement. Find ways to solidify partnerships from creation through monitoring and evaluation.
- NIFMA vs. NEPA-by time NEPA process that concludes public involvement but a lot of work has already been done and there is little opportunity for change. A lot of behind the scenes work before public invited in.
- Collaboration is much more cost effective. Reduces litigation when you have widespread by-in.
- Public is such a broad term. How do you define what the public is? Don't know who the "public" is.
- Collaboration is something we should think about. Is that term overused?
- Term pro-active versus passive. Typically proactive means your active user groups. Passive is publishing in local newspaper. Realistic guideline of proactive vs. passive for the public.
- Integrated development instead of collaboration. Want to integrate everyone.
- Is engagement really what we are trying to do?
- No included in planning process in appeal before decision is implemented. If they had all information from groups impacted they could change. Lots of user groups can't litigate. If involved from day one minimize shorten the process in the long run.
- User groups have to interface with lots of government agencies. Would be helpful if surrounding agencies and Forest Service, private got together to determine needs and opportunities.
- Although professional judgment may be useful it is not legally defensible; therefore, care must be taken when using professional judgment.
- LMP can and should be effective and pro-active.
- Need to define roles and responsibilities of various participants.
- NEPA/NFMA/HFA/HFRI etc.-already require collaboration, but it still isn't happening to the extent it should be. Not sure why, but we can't do the same thing and expect a different result.
- The collaborative process should involve the public throughout all critical phases of the planning process: defining desired conditions, identifying suitability of areas, developing strategies to achieve desired conditions, developing standards, monitoring and adapting plans as necessary.
- Early in planning process include federal and state agencies as well as the scientific communities (universities and species experts).
- Intentions of the public ought to be a consideration especially that of special interest groups.

Those who just want free land to use should not be afforded equal standing with those interested in what's best management for the resource.

<u>Process Principle 2</u>: Plans could incorporate an "all-lands" approach by considering the relationship between NFS lands and neighboring lands.

- Planning rule should require other contiguous public land to be viewed within the same strategic goal of forest plan.
- Consider any trans-boundary policy concerns that may create impediments to successful planning and management.
- Urban landscapes need to be considered-FS did national forests on the edge that were threatened from sprawl how do you take in to consideration landscape scale changes. How will they change? What will development look like in southern Appalachians? Needs to be incorporated.
- Incorporate local and state plans into the FS planning process.
- Local, state, regional, national plans-planning rule should recognize this rule and incorporate into plan.
- Portions could incorporate all lands but individual properties need individual specific management plans for that area and unique features.
- Looking at urban interface mandate specific management planning for public access and fire.
- The responsible official should cooperate with other state, local, federal, tribal governments to determine the extent to which if all lands approach is feasible. At least consider plans of other agencies, entities.
- Forests should recognize unique resources that require landscape approach beyond national forests boundaries (e.g., water quality and forest health, diseases, insects, fire, invasive species).
- Planning rule requires other contiguous public lands to be viewed within strategic goals of the rule.
- Allow for land trusts and easements to accommodate land acquisition.
- Some to all Forest Service adjacent lands should be managed at border with other lands, with good neighbor policy.
- Identify and prioritize areas for easements.
- Coordinate recreation uses with adjacent public and private lands.
- Create an opportunity for forests to recognize those unique resources that require a landscape scale approach beyond NF boundaries-water quality and quantity, forest health, disease, insect, fire, invasive species.
- Identify and mange for habit refuge and adaptation corridors across lands in a climate change era.
- How are we as an agency are we going to influence private landowners or other agencies?
- Plans should encourage collaboration between FS and adjacent landowners. Exchange needs and desires of both parties from the beginning. Focus on commonalities of foundation for future management and collaboration. Should be communicated well. Would go a long way toward making this happen.
- Plans should be integrated with community plans and with adjacent landowners who are willing to be involved in broad scale analysis.
- A big issue with fire and the plans-developing fire use and fire monitoring. Needs to be reconciled with other management objectives. Plans should enclose fire use plan-for p-burn, wilderness, etc.

- Don't use term all lands approach-might as well put a bulls-eye
- Define expectation for level of cooperation/coordination for concept of "all lands" approach and sovereignty of private/industrial/state land owners versus NFS land management.
- Plans should encourage collaboration between NFS and adjacent landowners by exchanging needs and desires of both; focusing on commonalities as a foundation for management and future cooperation.
- The all lands approach cannot be unduly restrictive to private adjacent landowners.
- Clarify all lands approach in analysis but not necessarily in the decision making.
- Creates opportunities to work with NGO's. How do we convince private landowners for values they may not understand? NGOs might be able to work with private landowners to explain these values versus the FS that landowners might not trust.
- Forest Service does not need to be telling landowners what to do. Should be considering neighbors.
- All lands approach considers contiguous land-use. Make clean that decisions of USFS do not control private property. Analysis of appropriate adjacent lands.
- Taking an "all lands" approach is very hard to imagine given the extent of NIPL in the south and the patchwork ownership.
- Look at other public lands to identify corridors that might link areas of public lands (mainly for species migration and exchange of genetic material)
- Change could to should
- All lands could be included but if no data or access then it shouldn't be required.
- Cooperate with adjacent landowners in prescribed burns. FS lands are liability to landowners because of excessive fuel loads. FS should use crews in cooperative efforts to burn through.
- Lot of good in 2005 liked CER Phase 1 and 2 focusing on risks and threats, opportunities. Called them plan options. Amend language what are risks and threats to adjacent lands. Let's not re-invent wheel-lot of good in 2005 and 2008 rules.
- Look at cumulative effects looking at all lands approach.
- Address the recreation resource in plan to facilitate "all lands approach". Should incorporate with state's comprehensive outdoor recreation plan, counties, and major municipalities to evaluate capabilities of all providers and determine appropriate roles for each based on their unique capabilities.
- All lands will be more effective as a management tool-but will require much more elaborate public interface-over time (not just during planning process). Develop on-going partnerships to implement plan objectives.
- Land management should collaborate with the public and get feedback on issues at hand.
- Should avoid "all lands" approach because it wastes valuable resources on projects out of NFS jurisdiction.

<u>Process Principle 3</u>: Plans could be based on the latest planning science and principles to achieve the best decisions possible.

- Include biological, social and planning. Not just best science available for management but strategy for best planning science.
- Science should include physics.
- Science must be deliverable not jus theoretically correct or ideologically sound.
- Agency should disclose more about the "latest" planning science and principles.
- Planning area must be informed by science and by legal and financial sideboards.

- The planning rule must be consistent with NFMA.
- Incorporate regional science panels and studies of climate change as a precursor and coordinated element for forest level planning.
- All forests should have a lidar flown at 10 year intervals on a 1 meter cell size.
- Each plan should have publically available GIS clearing house.
- Based on panel of scientists –local leaders, forestry, wildlife, hydrologist, etc. so that the plan can stand on appeal.
- Planning is not just a science it is an art and should involve the design arts and artists in general.
- Plans should prescribe to "precautionary principle"-if you don't have the information to move forward-don't. Hippocratic oath kind of thing.
- Use common sense approach.
- If practical and feasible each plan should include an ecosystem change simulation model that could inform the plan and that could be updated based on monitoring.
- In order to facilitate "best science" the agency should work with researchers within the agency to provide critical data, resources, models, analyses, etc.
- Trying to make amendments to forest plans less painful.
- Scratch the word "planning" in the third principle.
- Collaboration used to reach agreement of values and objectives. Science could be used to achieve objectives.
- Plans should be living documents when new plans are developed. Used as a foundation for revision process.
- Can't really establish objectives without science being part of the discussion. Are you trying to get consensus or you trying to get it right?
- Reconsider what the "latest planning science" means. Clarify this.
- Use intra-agency approach. Use own models agency developed.
- Plans should be based on latest science (strike word planning)
- Make amendment process efficient.
- These 3 principles are similar. Can't do one without the other. Multiple jurisdiction outfits such as scenic trails-find out how they are doing this and put it in the rule.
- What is latest planning science?
- Use Strategic Habitat Conservation.
- Plans could be based on latest planning science. Three sciences of knowing (experience, etc)…alternative knowledge claims. Latest might not be the greatest.
- Don't need to rule out professional judgment. Statistics are good but we live professional judgment out. Need to allow for that.
- Problem with 2005 and 2008 was professional judgment took hold. Need a happy medium
- Address with standards versus guideline.
- Emerging solution approach-trust process give time to emerge.

APPENDIX D:

WRITTEN COMMENTS RECEIVED IN COORDINATION WITH THE ROUNDTABLE

Citizens Task Force on National Forest Management

2428 Guilford Avenue
Roanoke Virginia 24015

February 16, 2010

To: fspr@contentanalysisgroup.com
From: James Loesel, Secretary CTF
Re: Comments on Planning Rule NOI

GENERAL COMMENTS ON FOREST PLANNING

We agree a new planning rule should be adopted.

Forest plans are decision documents. Forest plans should make forest-wide decisions. If decisions are not made in forest plans, there is no reason to spend time and money in creating them. For members of the public, this is the opportunity to help shape the program for forest management for the next decade or 15 years. For the forest managers this is the opportunity to make the trade-offs decisions for the multiple-uses of forest resources.

Forest plans should generally not make individual project decisions. We were strong proponents of making project decisions as part of the Jefferson National Forest's opportunity area analyses (OAA), which were based on watersheds. Making project decisions within opportunity area analyses was ended because it was ruled that insufficient alternatives were considered and the shelf-life of project decisions should not go beyond five years. If project decisions could not be sustained under NEPA in opportunity area analyses, which encompassed only a small portion of the entire forest, we cannot see how project decisions made for the entire area and duration of a forest plan area can be upheld.

We thought the two-stage NEPA process developed under the 1982 regulations was reasonable. The forest-wide decisions made in the forest plan become the framework within which project decisions are made. The project decisions tier to the forest plan.

Based on our 30 years of experience collaborating on creating forest plans in the Southern Appalachians, we conclude it is detrimental to good forest planning to emphasize development of "visions" or "desired conditions" for the forest or portions of the forest if the vision or desired condition is outside the budget or capacity of the Forest Service to accomplish. The recent experiment with the failed 2005 and 2008 planning rules encouraged the public and forest staff to

formulate "aspirational" desired conditions for the forest and special areas. "Aspirations" for the forest by the Forest staff and the public outstrip the actual capability to turn the aspirations into reality. When visioning and development of desired conditions becomes the focus, the planning process becomes a distribution of symbolic gratification rather than the opportunity to make hard choices about what can be accomplished. Subsequently, when the plan revision begins there is a litany of complaints from the public expressing frustration that the aspirational goals and objectives of the last plan were not accomplished.

We have heard countless times the argument that a plan should based on what the Forest Service and the public think should be the desired condition of the forest, without regard to the likelihood of budgets available to accomplish the goals and objectives of the plan. The argument is made that if the public really wants to see the plan accomplished, sufficient political pressure can be generated through the political process to fund the desired management. It never happens that way because it misconstrues how the budgets are developed in congress and allocated by the Forest Service hierarchy. This argument only perpetuates the gap between what is desired and what is possible.

We see forest plans as a contract between the Forest Service and members of the public. When the Forest Service does not fulfill the provisions of the forest plan, it reduces the level of trust by the public in the Forest Service. When it fulfills the provisions of the forest plan, it increases the level of trust, and creates the foundation for public collaboration in the next round of planning.

The starting point for forest planning should be development of an Analysis of Management Situation (AMS). The AMS should display the "current management" which how the forest is actually managed. This should be contrasted with how the current plan said the forest should be managed, commonly modeled in NEPA as the "no action" alternative.

The Analysis of Management Situation (AMS) should contain, at a minimum:

- GIS maps showing timber harvests since last plan.
- GIS maps showing fires, both prescribed and wildfire, since last plan.
- GIS maps showing insect and disease affected areas since last plan.
- GIS maps showing current road system and management of roads.
- GIS maps showing inventories, e.g., roadless, ROS, SIO.
- Numerical displays summarizing management activities over span of the last plan, e.g., timber harvest volume and acreage, acres burned.
- "Need for change" in current management, based on management direction from administration and Washington/Regional leadership.
- "Need for Change" or "No Need for Change" in current management, based on results of monitoring and best available science.

This AMS should be available at the time the Notice of Intent is released. This information would be very helpful for the public to comment on current management information and what additional issues should be addressed in the revision of the plan.

We are proponents of developing a plan through iterations of a "rolling alternative". We believe the initial alternative should reflect "current management". (We know that the accepted "no action" alternative is to model the current plan, and an alternative should be displayed that shows the current plan. In our view this is needed both to meet current legal interpretations of NEPA and also to

display what needs to change in the old plan). It would be much easier to develop a plan that is actually achievable if we started from what exists on the ground and what management resources are likely to be available, and then discuss what trade-offs can be made to incorporate to the extent possible the public issues, management concerns and resource use opportunities formulated during planning.

We see a crucial role for the public to collaborate throughout the development of the plan. In addition to responding to scoping in the NOI, public and other agencies would have the following minimum collaborative roles with the FS:

- Updating inventories, e.g., roadless inventory, old growth.
- Assist in defining issues to be addressed in NEPA.
- Assist in outlining the alternatives to be examined in NEPA.
- Assist in setting priorities for implementing the plan, depending on yearly budget appropriations and agreements with cooperating agencies/groups for services.
- Enlisted groups and individuals to help implement the plan through cooperative and volunteer agreements.
- Starting with current management, assisting in developing iterations of the plan ("the rolling alternative").
- Comment on the draft plan as required by NEPA, which would result in the final iteration of the "rolling alternative".

Much of the analysis required under the 1982 rule was not helpful in creating a good forest plan. It was time-consuming and did not provide the public or forest officials with meaningful information for collaborative development of the plan. The new rule should focus analysis on generating information for making real trade-off decisions, within the resources likely to be available for actually implementing various alternatives.

The new rule should require use of "best available science" in development of the plan.

The planning rule should state that a forest plan should include a monitoring plan, designed to provide information needed for the next AMS.

There is merit in holding an annual conference for each plan unit to provide a setting for collaboration between the public and the Forest Service, both for development and implementation of the plan.

Thank you for the opportunity to comment. If collaborative meetings are held in Region 8 or in Washington, we would be grateful for the opportunity to participate.

SPECIFIC COMMENTS ON PROVISIONS OF THE NOI

BELOW, WE HAVE USED CAPITAL LETTERS TO DIFFERENTIATE OUR COMMENTS FROM THE TEXT OF THE NOI. WE DO NOT IMPLY SHOUTING BY USE OF CAPITAL LETTERS.

Substantive Principles

1. Land management plans could address the need for restoration and conservation to enhance the resilience of ecosystems to a variety of threats...

2. Plans could proactively address climate change through monitoring, mitigation and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information...

3. Land management plans could emphasize maintenance and restoration of watershed health, and could protect and enhance America's water resources...

4. Plans could provide for the diversity of species and wildlife habitat...

5. Plans could foster sustainable NFS lands and their contribution to vibrant rural economies...

COMMENT: OTHER THAN SUBSTANTIVE ISSUES SPECIFICALLY OUTLINED IN THE NATIONAL FOREST MANAGEMENT ACT (NFMA), SUBSTANTIVE ISSUES ("PRINCIPLES") SHOULD NOT BE ADDRESSED IN THE PLANNING RULE. SUBSTANTIVE ISSUES LISTED IN THE NOI, SUCH AS ECOSYSTEM RESTORATION, CLIMATE CHANGE, AND WATERSHED HEALTH, SHOULD BE ADDRESSED IN THE DEVELOPMENT OF A FOREST PLAN. SUBSTANTIVE ISSUES EVOLVE OVER TIME, AND ANY LIST INCLUDED IN A NEW PLANNING RULE WOULD BECOME DATED WITHIN A FEW YEARS. SUBSTANTIVE ISSUES SHOULD BE INCORPORATED IN SERVICE-WIDE DIRECTIVES, THE STRATEGIC PLAN, OR POLICIES BY THE CURRENT ADMINISTRATION OR FOREST SERVICE LEADERSHIP (E.G., NATURAL RESOURCES AGENDA). THESE DIRECTIVES, STRATEGIC ISSUES, OR POLICY INITITIATIVES SHOULD BE INCORPORATED INTO THE DEVELOPMENT OF A FOREST PLAN AS SIDEBOARDS, ISSUES, OR MANAGEMENT CONCERNS.

Process Principles for a New Rule

1. Land management planning could involve effective and pro-active collaboration with the public. NFS lands are the public's lands that the Agency manages in trust for current and future generations. The Agency welcomes and encourages public collaboration throughout the planning process, and will seek to structure a new planning rule to ensure that processes for developing, revising and amending plans are efficient, transparent, and effectively engage the public.

COMMENT: WE HAVE PARTICIPATED IN NATIONAL FOREST PLANNING FOR MORE THAN 30 YEARS. THERE IS NO DOUBT THAT PUBLIC PARTICIPATION IN DEVELOPMENT OF FOREST PLANS HAS VASTLY IMPROVED THEIR QUALITY. ANY NEW PLANNING RULE MUST STRUCTURE CONTINUED AND EXPANDED PUBLIC ROLE IN FOREST PLANNING.

After plans are approved, responsible officials will continue to work with the public to resolve issues, to evaluate management there is a need to adjust the plan.

COMMENT: BASED ON EXPERIENCES ON THE JEFFERSON NATIONAL FOREST, WE BELIEVE THERE IS GREAT BENEFITS FOR HOLDING A FOREST-WIDE ANNUAL CONFERENCE TO ADDRESS CONCERNS OF THE PUBLIC AND PROVIDE FEEDBACK TO THE FOREST STAFF. MANY OF THE CONCERNS AND ISSUES RAISED BY THE PUBLIC DURING SCOPING FOR A PLAN DO NOT FALL WITHIN THE SCOPE OF THE PLAN

REVISION. THEY ARE MORE DIRECTLY ADDRESSED BY CONTACT WITH FOREST SERVICE LEADERS AND STAFF IN THE SETTING OF AN ANNUAL CONFERENCE. THIS CONFERENCE CAN ALSO BE USED AS PART OF DEVELOPING A FOREST PLAN. SEE THE LIST OF COLLABORATIVE OPPORTUNITIES LISTED ABOVE.
One challenge the Agency has faced with regard to public participation is that plans can at times take 8–10 years to revise, a timeframe that is too long to sustain a true collaborative effort and use the most up-to-date science and management thinking.
COMMENT: WITHOUT ADVOCATING LONG TIME FRAMES FOR REVISING FOREST PLANS, WE NOTE THAT IN DEVELOPING PLANS FOR BOTH THE GEORGE WASHINGTON AND THE JEFFERSON NATIONAL FORESTS, THE QUALITY OF PUBLIC PARTICIPATION DID NOT DECREASE EVEN WHEN THE TIME FOR REVISING THE PLAN EXCEEDED EIGHT YEARS. AS LONG AS THERE ARE MEANINGFUL OPPORTUNITIES FOR THE PUBLIC TO COLLABORATE IN DEVELOPING FOREST PLANS, WE WILL COME TO THE TABLE.
Specific questions we would like the public to address include:
• How could the Agency foster collaborative efforts?
COMMENT: MONEY NEEDS TO BE BUDGETED FOR TRAVEL, MATERIALS, SPACE, AND STAFF TIME.
What kinds of participation, forums for collaboration, and methods of providing input have you found most engaging?
COMMENT: PARTICIPATION AT THE TABLE IN INTERDISCIPLINARY TEAM MEETINGS HAS BEEN THE MOST PRODUCTIVE.
• What should the rule require to ensure a planning process that is both efficient and transparent while allowing for full public collaboration and participation within a reasonable timeframe? SEE COMMENTS ON PROCESS.
• 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? SEE COMMENTS ON PROCESS.
• 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?
COMMENT: DURING THE FIRST ROUND OF PLANNING, ADMINISTRATIVE APPEALS GAVE THE PUBLIC THE OPPORTUNITY TO BRING DEFICIENCIES IN PLANS TO THE REGIONAL AND WASHINGTON OFFICES. IN BOTH THE CASE OF THE JEFFERSON NF AND THE GEORGE WASHINGTON NF PLANS, THE REGIONAL OFFICE AND THE WASHINGTON OFFICE PROVIDED MEANINGFUL QUALITY CONTROL IN RESPONSE TO APPEALS BY THE PUBLIC. WE DO NOT SEE EITHER PRE-DECISIONAL OR POST-DECISIONAL OBJECTIONS OR APPEALS AS EFFECTIVE IN PROVIDING QUALITY CONTROL IN THE SECOND ROUND OF PLANS BECAUSE OF THE REDUCED PERSONNEL AVAILABLE TO REVIEW PLANNING DECISIONS AT THE REGIONAL OR WASHINGTON OFFICES. QUALITY CONTROL IS MORE LIKELY TO BE PROVIDED BY THE COURTS. HOWEVER, WE STRONGLY RECOMMEND THAT APPEALS OR OBJECTIONS BE CONSIDERED AT THE REGIONAL OR WASHINGTON OFFICE LEVELS. THE FOREST SUPERVISOR SHOULD NOT BE ALLOWED TO DECIDE IF THE FOREST HAS ADEQUATELY ADDRESSED NATIONAL AND REGIONAL SUBSTANTIVE AND PROCEDURAL ISSUES.

2. Plans could incorporate an ‘‘all-lands’ ’approach by considering the relationship between NFS lands and neighboring lands. The threats and opportunities facing our lands and natural resources do

not stop at ownership boundaries. Healthy forests and grasslands are elements of integrated landscapes that need to be restored, conserved and managed across geographical and organizational boundaries in ways that respect private rights and multiple ownerships. The land management planning process provides direction for NFS lands only. However, the planning process provides an opportunity for the Agency to engage other Federal land management agencies; Tribes, State, and local land managers;
COMMENT: IF YOU STOP AT THAT POINT, YOU ARE ONLY REPEATING THE PROCESS OUTLINED IN THE 1982 REGULATIONS. THAT SEEMS REASONABLE.
...private landowners; and nongovernmental partners to collaborate on strategies to restore and sustain healthy forests and grasslands across landscapes. Incorporating an all-lands approach in the planning process is also important as land management plans anticipate the effects of broad challenges such as climate change which can cause impacts on a regional scale.
COMMENT: ANY HINT IN A FOREST PLAN OF GIVING DIRECTION FOR MANAGEMENT OF LANDS OUTSIDE PUBLIC OWNERSHIP WILL BE GREETED WITH CHARGES OF GOVERNMENT TAKE-OVER OF PRIVATE PROPERTY RIGHTS. COMMUNISM. BLACK HELICOPTERS. ONE-WORLD CONSPIRACY. EVEN SHOWING PROCLAMATION BOUNDARIES ON MAPS FOR THE 1993 GEORGE WASHINGTON NATIONAL FOREST PLAN CAUSED CONSIDERABLE AGITATION AMONG SOME LANDOWNERS THAT THE PLAN WAS TELLING THEM HOW TO MANAGE THEIR PROPERTY.
.Specific questions we would like the public to address include:
• How should the planning rule account for the relationship of NFS lands to surrounding landscapes?
COMMENT: THE LIKELY ENVIRONMENTAL EFFECTS OF PRIVATE LANDS ON NEARBY NATIONAL FOREST LANDS SHOULD BE INCLUDED IN FOREST SERVICE ENVIRONMENTAL ANALYSES. FOR EXAMPLE, THE WILDLIFE HABITAT PROVIDED BY OPEN FIELDS ADJACENT OR NEAR NATIONAL FOREST LANDS SHOULD BE INCLUDED IN ENVIRONMENTAL ANALYSES.
• 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?
COMMENT: RATHER THAN ADDING TO THE BURDEN OF INCORPORATING PLANNING FOR PRIVATE LANDS IN THE PLANNING PROCESS FOR NATIONAL FORESTS, WE BELIEVE A LESS CONTENTIOUS APPROACH WOULD BE FOR STATE & PRIVATE FORESTRY OFFICIALS ALREADY PART OF THE FOREST SERVICE TO ENCOURAGE THE PUBLIC TO COLLABORATE IN ADDRESSING SUBSTANTIVE ISSUES SUCH AS WATERSHED PROTECTION, ECOSYSTEM HEALTH, AND RESPONSE TO CLIMATE CHANGE THROUGH PROGRAMS AND BUDGETS THAT REFLECT THE POLICY DIRECTION BY CONGRESS, THE ADMINISTRATION, AND FOREST SERVICE LEADERS. THAT DOES NOT PRECLUDE ATTENTION TO THE FOREST PLAN BY STATE & PRIVATE FORESTRY OFFICIALS WHEN DEVELOPING COLLABORATIVE EFFORTS.

3. Plans could be based on the latest planning science and principles to achieve the best decisions possible. The new planning rule could encourage the creation of a shared vision of the planning area. Developing this through a strong collaborative public process could create a common understanding of the goals and direction for each plan, and will frame management actions and projects on the ground as a plan is implemented. Creating a plan that reflects a clear description of the shared vision and the desired conditions of a planning area, a strategy for moving toward the vision; and design criteria, including standards and guidelines that would apply to project and activity decisions, might be one way to move toward achieving the vision.
COMMENT: THE EMPHASIS SHOULD BE ON INCORPORATING THE BEST SCIENCE

AVAILABLE.
PLANNING IS NOT A SCIENCE, IT IS AN ART.
OUR EXPERIENCE IS THAT AGREEMENT AMONG VARIOUS GROUPS COMES FROM DISCUSSION ABOUT VERY SPECIFIC PARCELS OF THE FOREST, USING VERY SPECIFIC AND BINDING LANGUAGE.
SEE ALSO OUR COMMENTS ABOUT THE PLANNING PROCESS.
Specific questions we would like the public to address include:
• How can the planning rule support the creation of a shared vision for each planning area through the planning process?
COMMENT: WHILE IT IS POSSIBLE TO EXPEND A LARGE AMOUNT OF ENERGY IN ATTEMPTING TO CREATE A SHARED VISION AMONG THE PUBLIC AND FOREST SERVICE, THE HIGH LEVEL OF ABSTRACTION THAT THIS GENERALLY ENTAILS MAKES THE STATEMENTS MEANINGLESS IN GUIDING THE OPERATION OF THE FOREST. CREATING A SHARED VISION AMONG DISPARATE GROUPS ALSO RESULTS IN SEPARATION FROM THE REALITIES OF BUDGET CAPACITY TO IMPLEMENT PROGRAMS. GROUPS AND INDIVIDUALS HAVE PARTICULAR "WANTS" FROM A NATIONAL FOREST. DECISIONS ABOUT MANAGEMENT OF THE NATIONAL FORESTS SHOULD FOCUS ON THE TRADE-OFFS ON WHAT THE NATIONAL FOREST CAN ACTUALLY SUPPLY TO THE VARIOUS MEMBERS OF THE PUBLIC, NOT ON GENERATING "FEEL GOOD" STATEMENTS ABOUT A DESIRED FUTURE.
IN OUR EXPERIENCE IN COLLABORATIVE DEVELOPMENT OF FOREST PLANS IN THE SOUTHERN APPALACHIANS, IT IS POSSIBLE TO ACHIEVE A SHARED VISION ON SPECIFIC PIECIES OF LAND BY AT LEAST A PLURALITY OF INDIVIDUALS AND GROUPS. WE HAVE FOUND THAT AGREEMENT IS MORE LIKELY AS THE DIRECTION FOR MANAGMENT IS SPECIFIC AND BINDING, AND ACTUALLY IMPLEMENTED DURING THE LIFE OF THE PLAN. MEMBERS OF THE PUBLIC ARE MORE LIKELY TO SUPPORT MULTIPLE USE TRADE-OFF IN THE PLAN WHEN THE FOREST SERVICE DELIVERS ON ITS PROMISES MADE IN THE FOREST PLAN THROUGH PROJECT IMPLEMENTATION AND ADHERENCE TO STANDARDS AND GUIDELINES.
• Local and regional differences will have an impact on desired conditions and on the successful creation and implementation of a shared vision for any given planning area. Given that different areas will have different needs, should the planning rule allow a choice of planning processes? How could the planning rule create different process
choices, and how could they be presented in the rule? What kinds of provisions would need to be included to guide and evaluate a process choice?
COMMENT: THIS SEEMS LIKE A BLUEPRINT FOR CONFUSION AND ENDLESS ARGUMENT.
BECAUSE DIFFERENT AREAS WILL HAVE DIFFERENT NEEDS, THE PLANNING RULE SHOULD SET FORTH A GENERAL PROCESS THAT ALLOWS THESE DIFFERENCES BETWEEN AREAS TO BE ADDRESSED IN THE FOREST PLANS
• Much discussion has been centered on how land management plans should be viewed; are they strategic documents that lay the foundation for specific future actions to help meet unit goals? Or, should land management plans also make project or activity decisions?
COMMENT: ARE YOU ATTEMPTING TO PERPETUATE SUPPORT FOR THE FAILED/ILLEGAL VIEWS OF THE 2005 AND 2008 RULES?
SEE OUR COMMENTS ABOUT THE DECISIONS TO BE MADE IN FOREST PLANS
• Based on your response to the question above, what is the range of options for fully complying with NEPA during land management plan development, amendment, or revision?

COMMENT: THE DECISIONS MADE IN A FOREST LAND AND RESOURCE MANAGEMENT PLAN REQUIRES AN ENVIRONMENTAL IMPACT STATEMENT. PROJECT DECISIONS REQUIRE NEPA, BUT THE LEVEL OF DOCUMENTATION DEPENDS ON THE NATURE AND LEVEL OF THE IMPACTS IN THE PROJECT

• Should the new planning rule require standards and guidelines that are required for all plans?

COMMENT: THE NATIONAL FOREST MANAGEMENT ACT REQUIRES SOME STANDARDS AND GUIDELINES.

• How can the agency analyze and describe the environmental effects of a planning rule in the environmental impact statement?

COMMENT: ACCORDING TO NEPA.

Possible Alternatives

The Agency will identify a proposed action and a no-action alternative as it develops an EIS. Additional alternatives have not been identified, but will be developed based on the comments that are received. The Agency will frame issues and alternatives during the scoping and public comment periods in the NEPA process.

COMMENT: WE BELIEVE PUBLIC COLLABORATION SHOULD ALSO SHAPE THE ALTERNATIVES TO BE EXAMINED. THE APPROACH WE HAVE OUTLINED ABOVE SHOULD BE FORMULATED AS AN ALTERNATIVE AND EVENTUALLY THE PROPOSED ACTION.

APPENDIX E:

COMMENTS POSTED TO USFS BLOG ON APRIL 16, 2010

What should the planning rule say about how plans deal with the provision of goods and services that contribute to vibrant local and national economies?

Should, and if so how can, the rule include provisions for managing lands for the sustainable delivery of ecosystem services?

Posted by rcgriffith @ *09:47 AM CDT* Comments [9]

Comments:

We should not manage our forests for economic gains. We need to start preservation conservation - and stop the sustainable usage model. The planning rule should state that the first consideration must be to the well being of the forest - that commercial usage (timber, livestock, etc) of the forests should be phased out and that utilizing the forest for "goods and services" should be minimal and restricted and reduced so that less than 10% of all forest lands are utilized at all.

Posted by **CAnative** on April 16, 2010 at 08:27 PM CDT #

Use and Enjoyment of National Forest System Lands

What should the planning rule say about suitable uses?

What should the planning rule say about places of interest?

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

Posted by rcgriffith @ *09:44 AM CDT* Comments [21]

Comments:

National planning rule o The word RULE should be changed to GUIDELINE. o Should be written to address the 50 states (and territories?) as a whole, written at a very high level (leave specifics to regional (cross state), state and local plans). o Incorporate guidance that lead to comprehensive Regional (cross state), State, and local plans. o As stated above, D.C. cannot write one comprehensive, detailed plan that addresses issues from Florida to Oregon. The National level guidelines should outline what the subordinate plans should cover, encourage ideas, and not eliminate options. Blanket policies may even violate the 10th Amendment (Bill of Rights: “The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people.”). Written well enough, the guidelines could stand for decades without the need for a rewrite. Regional, state, and local plans could be updated as required. o Written as above, a national plan could be short in length, and actually save money due to the abbreviated nature of the document. o Some of the plans will be less successful than others. Successful plans can be used to improve sub-par plans over time. With a national, one size fits all plan, there is no room for innovation. What works in the deserts of Arizona may not work in the woodlands of New York, but individual ideas developed in Arizona may aid New York in plan refinement. Use and Enjoyment of National Forest System Lands • What should the planning "guidelines" say about suitable uses? o Guidelines should specify Regional, State, and local plans should address suitable uses o Don’t eliminate the possibility of new uses o Refer to use of forests as just that, use, leave the specifics to the Regional, State, and local plans • What should the planning "guidelines" say about places of interest? o Guidelines should specify Regional, State, and local plans should address places of interest o Leave specific comments to the regional, state, and local plans. • What should the planning "guidelines" say about access, visitor facilities, and services? o Guidelines should specify Regional, State, and local plans should cover access, visitor facilities, and services o Leave specific comments to the regional, state, and local plans.

Posted by **DavidF** on April 16, 2010 at 01:26 PM CDT #

Use and Enjoyment of National Forest System Lands • What should the planning rule guidelines say about suitable uses? o Guidelines should specify Regional, State, and local plans should address suitable uses o Don’t eliminate the possibility of new uses o Refer to use of forests as just that, use, leave the specifics to the Regional, State, and local plans • What should the planning rule guidelines say about places of interest? o Guidelines should specify Regional, State, and local plans should address places of interest o Leave specific comments to the regional, state, and local plans. • What should the planning rule guidelines say about access, visitor facilities, and services? o Guidelines should specify Regional, State, and local plans should cover access, visitor facilities, and services o Leave specific comments to the regional,

state, and local plans.

Posted by **DavidF** on April 16, 2010 at 04:16 PM CDT #

I agree with: "Our nation’s forest resources are perhaps more important now than ever. They need to be actively and sustainably managed to provide economic benefits, recreational opportunities, and such ecosystem services as biodiversity, clean water, and carbon mitigation." You touch on "recreationl opportunities." Tie that recreational opportunity into Obama's "Let's Move" "program to end the American plague of childhood obesity in a single generation." Now, you are pulling in other stakeholders into your program, increasing your visibility. Get the kids off the couch and into the forests. Skin up thier knees and they'll be better off for it.

Posted by **DavidF** on April 16, 2010 at 04:25 PM CDT #