

## US Forest Service Planning Rule Regional Roundtable Report Eastern Region: Region 9 April 29, 2010 – Chicago, Illinois



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## **Executive Summary**

The Eastern Region (Region 9) of the U. S. Forest Service convened roundtable discussions in Chicago, IL on April 29, 2010 to obtain input regarding the development of a new Planning Rule that will govern National Forest and Grassland Management Plans. Approximately 50 people participated in the roundtable discussions, either in-person or on-line.

This document summarizes the comments received at the Eastern Region roundtable. The comment summaries are organized around four Planning Rule process principles and eight Planning Rule substantive principles as generally outlined in the Planning Rule Notice of Intent. This summary reflects the range of perspectives represented at the roundtable discussions. It does not represent a consensus, nor does it reflect agreement among participants. Where bulleted lists of ideas are included, they are not ranked or prioritized.

Appendix A includes the notes from each small group and plenary session. It also includes all written and e-mail comments received as part of the Eastern Region roundtable discussions. Roundtable evaluations results are tabulated in Appendix B.

This report also identifies and includes a summary of recurring themes that emerged from the Region 9 discussions. These themes are:

- 1. Build extensive and meaningful stakeholder collaboration into all aspects of the Planning Rule development process, as well as the processes for revising and amending individual forest and grassland plans.
- 2. Provide the structure for forest and grassland plans.
- 3. Build flexibility and responsiveness to changing conditions into the planning process.
- 4. Recognize that Eastern and Western Forests and Grasslands differ in significant ways.
- 5. Develop plans that the public can expect to see implemented.
- 6. Be pro-active in avoiding litigation.
- 7. Expand the Forest Service's education, outreach and volunteer programs.

#### Introduction

In December 2009, the U.S. Forest Service (USFS) announced its intention to develop a new national Planning Rule (Rule) to guide development of management plans for the nation's national forests and grasslands. In the Notice of Intent (NOI) to issue this new Planning Rule, the Forest Service identified a number of questions about both the process and substance of the new Rule. These questions covered a wide range of environmental, economic and cultural issues that may affect national forests and grasslands.

As part of the Planning Rule development process, the Forest Service initiated an extensive collaborative process to engage citizens, interest groups, governments, and scientists in roundtable discussions in each of the nine USFS region and at the national level.

The USFS Eastern Region (Region 9) hosted its public roundtable discussion on April 29, 2010, in Chicago, Illinois with the opportunity to participate via the internet. This roundtable was one of a series of regional and national roundtable events convened by the US Institute for Environmental Conflict Resolution in order to encourage dialogue and seek meaningful input to guide development of a new national Planning Rule.

The Eastern Region roundtable began with welcoming remarks by Deputy Regional Forester Logan Lee. Acting Regional Planner Rick Hokans then explained the process for developing the national Planning Rule and how the round table comments were critical to completing that process. Following the plenary session, there were several facilitated group discussions focused on the topics of particular interest in the Eastern Region. These small group discussions were then followed by an evening plenary discussion led by Deputy Regional Forester Logan Lee. Those who participant from remote locations via the internet provided comments through the wiki set up for this purpose.

## **Roundtable Themes**

The following themes emerged from several different group and plenary discussions and from written comments. These themes transcend specific Planning Rule questions identified in the NOI, and relate to issues that participants raised repeatedly—sending a clear signal that participants want the Forest Service to consider them over the course of Rule development and implementation.

**1.** Build on-going, extensive and meaningful stakeholder collaboration into the entire **process.** Participants called for meaningful stakeholder involvement throughout all aspects of the planning rule development process, as well as the processes for revising and amending individual forest and grassland plans. Roundtable participants lauded the Forest

Service for convening the roundtable discussions. They want the Forest Service to continue this collaborative approach throughout the Planning Rule development process. Participants suggested that the Forest Service create a stakeholder advisory group for the Rule development process. They also want the new Rule to mandate the creation and active involvement of stakeholder advisory groups for all plan revisions and major plan amendments.

- **2. Planning Rule structure.** Participants had varying opinions regarding how prescriptive the Planning Rule should be. Some participants want the new Rule to establish the structure and standards regarding what each forest and grassland plan should contain, without being prescriptive regarding the substance of individual plans. Others want the Rule to be very explicit and detailed regarding the standards that all plans must meet.
- **3.** Ensure the planning process is flexible and responsive to changing conditions. Participants want Forest Service managers to have the flexibility they need to be able to respond effectively to changing conditions.
- **4. Recognize that Eastern and Western Forests and Grasslands differ in significant ways.** Participants noted that Eastern Region Forests are situated in very different contexts than Western Forests. Eastern and Western land ownership and use patterns differ significantly, consequently forest management needs and goals also differ. Region 9 participants want the new Planning Rule to explicitly acknowledge these differences. The Rule should ensure Western issues don't "drive" forest plan development nationwide. An example was given regarding restoration. Eastern participants are concerned that the Forest Service equates "restoration" with "return to fire dependent ecosystems", because many Western eco-systems are fire dependent, whereas Eastern eco-systems are less fire dependent. Consequently, while fuels management is an extremely important component of Western Forest and Grassland management plans, it is not nearly as important in the Eastern Region.
- **5. Develop plans that will be implemented.** Participants expressed concern that currently forest and grassland plans do not get implemented because of significant funding limitations and because of litigation. Participants want a Planning Rule that results in plans that the public can expect will actually be implemented.
- **6. Be pro-active in avoiding litigation.** Write the new Rule so that it clearly is within the Forest Service's statutory mandates, as articulated in the National Forest Management Act (NFMA) and the Multiple Use Sustained Yield Act (MUSYA). Use clear, concise language and include definitions to reduce ambiguity and the likelihood of litigation. Involve affected stakeholders throughout the process.

#### 7. Expand the Forest Service's education, outreach and volunteer programs.

Participants encourage the Forest Service to take a more active role as public educator regarding stewardship and natural resource management issues.

A number of participants commented that they want the Forest Service to use volunteer energy and expertise more creatively and effectively. Volunteers offer the Forest Service a low-cost opportunity to expand its educative role, and accomplish more of its management goals. They commented that there are lots of knowledgeable and willing volunteers that can assist the Forest Service accomplish all aspects of its programs including research, plan development, and plan implementation and monitoring.

## **Process Principles**

The Planning Rule Notice of Intent identified a number of questions regarding planning process principles. The Roundtable participants used these questions as a starting point for small group discussions. Here is a summary of these comments. They are divided into four categories: Collaboration, Plan Content, Plan Amendment and Revision Processes, and All Lands and Regional Context.

#### I. Collaboration

Tribal and stakeholder involvement in the Rule development and plan revision processes was a major theme of the roundtable. Participants lauded the Forest Service for convening the roundtable discussions, and called for on-going collaboration with tribes and stakeholders throughout the process of developing the new Rule. They also want the new Rule to require intensive and meaningful tribal and stakeholder involvement throughout plan amendment and revision processes. Comments related to collaboration included the following:

- The Planning Rule should explicitly acknowledge and define the government-togovernment relationship with the Tribes, and delineate the extent and methods of Tribal consultation in the planning process.
- The Planning Rule should foster intergovernmental and interagency cooperation at the local, regional and national levels.
- The Forest Service should create a Planning Rule development stakeholder advisory group that includes forest users and state and federal agencies. This advisory group should be actively involved throughout the Rule development process, and might be responsible for assisting in defending and implementing Rule. This advisory group would help the Forest Service go beyond the current process of gathering input, and help achieve broad stakeholder buy-in and support for the new Rule. An example was given of a friends group in Idaho who worked with the Forest Service on the roadless rule committee.

- The Planning Rule development process should include far more events and far longer comment periods than those currently proposed.
- The Planning Rule should require extensive and meaningful stakeholder collaboration –including the creation of stakeholder advisory groups --throughout the process of developing and implementing forest and grassland plans.

### **II. Planning Rule Content**

Nearly all the participants agreed the Forest Service should do whatever it can to develop a Rule that is legally defensible. They want Forest Service staff to devote their time and resources to implementing plans, rather than defending the Planning Rule in court. Participants' views varied significantly, however, regarding how to achieve a legally defensible Rule. Some expressed the opinion that the new Rule should be concise and non-prescriptive—allowing individual forest managers more latitude in making decisions. Others want the new Rule to clearly articulate detailed management goals that all forest and grassland plans must meet, thereby minimizing the amount of interpretation that is left to individual forest and grassland managers, and to the courts.

A tension between the desire for consistency across the National Forest system and desire for flexibility to manage individual units in response to local and regional needs also permeated much of the roundtable discussions.

Participants made the following comments regarding Planning Rule content:

- To be legally defensible, the Planning Rule should stay within its current statutory authority. The 2000, 2005, 2008 Planning Rules were too complicated, and arguably-- exceeded the Forest Service's authority. Keep the Planning Rule clear and straightforward so that there is less for the courts to interpret. Some participants expressed the opinion that there is too much ambiguity in previous rules, and want to ensure that the Rule doesn't permit multiple interpretations that are subject to potential litigation.
- The Planning Rule should include well-defined terms to avoid forest and grassland plans that are complex, complicated, and subject to litigation. A number of participants are frustrated that litigation has prevented plans from being implemented.
- The Planning Rule should include clear timelines that limit the length of the plan revision process. Some suggested that the revision process be limited to at most two years; others felt that this was too short a time span and would have the effect of draining Forest Service staff time away from project work.

- The Forest Service should review past planning efforts and determine what has worked and what has not worked. This analysis would help the Forest Service and others create a better new Rule.
- The Planning Rule should not focus on making revision process *less expensive*, but rather should focus on making the process more *cost effective*.
- The Planning Rule should only provide the framework or structure of what to include in forest and grassland plans. The Rule should specify *what* to address, but leave the *how's* to individual forests and grasslands.
- The Planning Rule should require that every forest and grassland plan meet the Forest Service's multiple use mandate and explicitly address specific uses, including mineral extraction.
- Some participants felt that the new Planning Rule should retain the big picture ideas from the Notice of Intent regarding protection, restoration, adjacent lands and adaptation to climate change. Others felt that climate change issues are outside the Forest Service's authority and should not be included in the Planning Rule.
- The Planning Rule should require better links between the information collected during the plan development and the resulting management plans. For example, the planning process may require social assessments and species viability analyses, but this information may or may not appear in the final plan. A lot of information is collected in the planning process that doesn't seem related to the actual plans.
- The Planning Rule should not dictate units of analysis (e.g. watersheds) for all
  forests and grasslands. The Rule should allow individual forests and grasslands to
  choose appropriate analysis areas based on their specific needs and conditions.
  In many parts of Region 9 there is low topographic relief so analyses based on
  ecological units might be preferable to watershed-based analyses. For example,
  watershed analysis areas are not necessarily appropriate for prairie or grassland
  systems.
- Current forest and grassland plans try to do too much, and do not get fully implemented. The Planning Rule should foster forest and grassland plans that are clearly focused on what can actually be done.
- The Planning Rule should include a provision requiring unsuccessful litigants of Forest Service planning processes be held financially responsible for lawsuits that are found by the court to be frivolous.

#### **III. The Plan Amendment and Revision Processes**

The Deputy Regional Forester reminded participants that all Region 9 Plans were recently revised and that the new Planning Rule will primarily affect Region 9 forests and grasslands management plans when they are next amended or revised. The next round of Eastern Region management plan revisions isn't likely to start until 2014-2015. With that in mind, the following comments were offered regarding the amendment and revision processes.

- The Planning Rule should streamline the amendment process, but without bypassing the requirements of the National Environmental Policy Act (NEPA).
- The issues that "drive" revision of any given plan should be clearly articulated, analyzed and addressed in the plan.
- The new Planning Rule should call for plan revisions on a cycle of less than 15 years, so plans are kept current and the revision process takes less time.
- Major amendments to and deviations from a forest or grassland plan should require full NEPA analysis and public disclosure so that stakeholders have the opportunity to comment.

## IV. All Lands and Regional Context

- The Planning Rule should foster plans that permit Forest Service managers to look beyond Forest Service boundaries when considering ways to achieve plan goals.
   For example, trading of land allotments to achieve ecological goals should be actively encouraged.
- The Planning Rule should address transboundary land management issues, and allow for private-public collaboration to address differences in management practices of adjacent lands.
- The Planning Rule should require that plans include historical and cultural context as well as landscape context. This historical and cultural information is essential to plan development and implementation.
- The Planning Rule should make explicit that forests look outside their boundaries
  for opportunities to provide societal benefit. For example, maybe the forest can
  provide ecosystem services that adjacent areas cannot. The Forest Service does
  not have management authority outside of federal land, but it can look for
  opportunities for collaborative planning and implementation.
- The Planning Rule should address urban forestry, and the connection between Forest Service lands and urban lands, as is currently being done for invasive species.

## **Substantive Principles**

Roundtable discussions addressed some of the questions regarding substantive principles that were articulated in the Notice of Intent to develop a new Planning Rule. How the Forest Service interprets its multiple use mandate is central to many of these substantive principles. Not surprisingly, participants differed regarding how the new Planning Rule should define multiple use, and how much emphasis it should put on consumptive and non-consumptive uses.

Participants' viewpoints regarding these substantive principles are summarized in the following categories: Recreation; Timber Harvesting and Sustainable Communities; Restoration; Climate Change, Diversity of Plants and Animals, Watershed Health, and Ecosystem Services; Roadless Areas and Wilderness; Adaptive Management and Monitoring; Education and Outreach; and Plan Implementation.

#### I. Recreation

Recreational use of national forests and grasslands was of significant interest to a large number of the Region 9 roundtable participants, as was timber harvesting and mineral extraction. Specific comments:

- The Planning Rule should require that forest and grassland plans include master plans delineating what areas are best for particular recreational uses. Trails systems should be designed and designated for specific uses.
- The Planning Rule should require that each forest and grassland establish recreational steering committees that include representatives of all user groups to properly plan trail use and other recreational uses.
- The Planning Rule should require the integration of road construction and long term recreational trail system planning, so that new roads are built in a way they can serve other purposes in the long run.
- The Planning Rule should respect how user groups self-identify. For example, mountain bikers do not want to be categorized as "motorized" or "mechanized".
- The Planning Rule should ensure that forest and grassland plans include flexibility to identify and respond to the needs of new user groups that arise after plan development.

## **II. Timber Harvesting and Sustainable Communities**

- Several participants felt that timber harvesting is subject to excessive litigation because previous planning rules were too complex. Many small, family-size companies are affected by limitations on timber harvesting. The planning process should recognize that many people make their livings from the forests, including miners, recreation/tourism industry people, and harvesters.
- The Planning Rule should focus on providing consistent, reliable and sustainable sources of fiber to local and worldwide markets. Consistent, reliable fiber sources are critical to local economies.
- Each forest and grassland plan should directly address mineral extraction.
- The Planning Rule should ensure that socio-economic concerns are meaningfully described and analyzed in the forest and grassland plans, highlighting the economic benefits of ecological services and recreational activities.

#### **III. Restoration**

- The Planning Rule should better define "restoration". Currently "Restoration" means different things to different people. Other terms, such as *resilience*, *rehabilitation*, *remediation*, *and reconciliation* may be more accurate or meaningful.
- Some participants expressed the opinion that if the Planning Rule establishes restoration as a goal it should do so in a way that sets clear restoration goals nationally. Others feel that the regions should be given latitude to define restoration goals. Still others felt that restoration goals are best established at the individual forest and grassland level.
- Some participants expressed the opinion that it's unrealistic to try to restore systems to pre-settlement conditions.
- Almost all Region 9 national forest lands have been degraded and cannot be "restored". Resiliency rather than restoration should be the goal.
- Restoration is a problematic term in Region 9. In the western U.S., "restoration" is sometimes used to mean "return to fire dependent ecosystems". Because many Region 9 ecosystems are not as fire dependent as western regions, achieving fire dependency should not drive management strategies. .
- In the East, system resiliency and sustainability are perhaps better goals than restoration—particularly if restoration carries with it an implied return to fire dependency. These are important distinctions because they affect resource allocation and future Forest Service investments. If restoration and fuels

- management are built into the Planning Rule it will create a strong western bias limiting resources available to eastern national forests.
- East of the Mississippi watershed ecosystem enhancement and clean water are more important than fire dependency and fuels management.

## IV. Climate Change, Diversity of Plants and Animals, Watershed Health, and Ecosystem Services

- The Forest Service should focus on watershed, water quality, and water retention issues as it considers how to address climate change.
- The Planning Rule should require that all plans make native species protection a high priority.
- The Planning Rule should clarify and strengthen the population viability standard so that it's clear the goal is viable population numbers across the planning area.
- Forest plans should consider a number of factors including the affects of patch size, connectivity of protective canopy closure and availability of Old Growth when assessing a project's impact on habitat.
- Forest Plans should call for multifaceted funding for easements and bio-reserves built around shoring up county budgets, community development and Forest Service monitoring and operations budgets. The Forest Service should provide opportunities that vigorously stimulate and tap into the enormous public support for forest protection.
- Plans should include selling easements and adoptable habitat acres to rest or
  protect national forest habitats. Public and private entities could then buy
  easement leases to build carbon credits and green credits for protecting wildlife
  while generating funds for county budgets, local community development
  including value added logging initiatives. Proceeds from these easement sales
  could also help fund Forest Service initiatives, including comment period
  outreach, monitoring, controlled burns and road deconstruction of short-term
  deferrals and long term set asides like roadless areas, bio-reserves and even new
  wilderness.
- The Planning Rule should require that all forest and grassland plans identify and protect high quality lands and waters.
- Focus on ecosystem functionality rather than managing for specific species.
- Focus on *resilience* on federal lands by concentrating on genetic diversity rather than species diversity. Species diversity may help with adaptability.

- Forest Plans and projects should maintain actual viable populations of vertebrate and plant wildlife using scientifically based monitoring protocols.
- The pine marten, yellow birch, fresh water fairy shrimp, mussels, dragonflies, and freshwater sponges should be protected.
- The Planning Rule should include ecosystem services (e.g. carbon sequestration) and it should include tools for assessing the monetary value of these ecosystem services. Some participants feel that It is important that plans quantify the benefits of forest resources, so that we have ways to evaluate different options, others feel the benefits if wilderness have a boundless value that is not quantifiable.
- The Planning Rule should note that wild land is scarce, and becoming more valuable, and should include ways to assess the value of wild lands.

#### V. Roadless Areas and Wilderness

- The Planning Rule should focus more on *stewardship*, and less on *use*. Good stewardship is using the resources without doing harm. The Rule should guide forest and grassland management so that uses with adverse impacts are minimized, and uses with positive impacts are encouraged.
- The Planning Rule Planning Rule's highest priority should be preserving our existing wilderness and roadless areas for future generations.
- The Planning Rule should require that each forest and grassland plan include a roadless inventory consistent with the standards and guidelines provided in the Land and Resource Management Planning Handbook.
- The Planning Rule should clarify that roadless inventories are used for the sole purpose of making new Wilderness Area recommendations to Congress. The Rule should include clear guidance for the release of non-designated areas once the Wilderness decision is made.

## VI. Adaptive Management and Monitoring

- The Planning Rule should require that plans include a process for monitoring and measuring progress toward achieving the plan goals and objectives as the plan is implementation.
- The Planning Rule should include provisions for adaptive management that are flexible and easy to administer, and that provide for consistency between plans.
- The Planning Rule should require that management plans include clearly
  articulate future conditions so that strategies can be devised to measure progress
  toward these goals. Clearly articulated plan goals and a process for measuring
  progress toward those goals can also be useful in resolving the conflict that is

- inevitable with multiple uses. An example was given of a ffernproject in which storm water basins were constructed to rehydrate the prairie, then post-construction monitoring found that the basins had lead to unintended flooding.
- Monitoring is often called for in plans but is not conducted, because the Forest Service is not adequately funded. Congress should provide the funding needed so that the Forest Service can manage public lands well. Monitoring is an essential part of good land management.
- The Planning Rule should foster regional data sharing and partnering opportunities with local organizations. Partnering will increase access to more upto-date information and provide a larger view of what is going on at the landscape level.
- The Planning Rule should encourage forests to be innovative in funding monitoring.

#### VII. Education and Outreach

- Active collaboration with user groups should be built in throughout the plan
  development and implementation process. For example, when the Forest Service
  is planning a timber harvest that will result in a trail being closed to a user group,
  it should collaborate with the user group to ensure that users are informed. The
  organized user groups could help distribute that information to reduce conflicts
  and provide other options to recreate.
- The Forest Service's role in public education is very important.
- Citizen involvement in the planning process is crucial. Citizen advisory groups should be actively involved in all aspects of the planning process.
- Forest planning processes need to engage user groups to ensure that the groups'
  needs are being met. Labeling a trail on a map as suitable for mountain bikes
  doesn't mean that it meets the needs of the bikers.
- The Planning Rule should include requirements for public participation and collaboration, and should ensure that as broad a range of stakeholders as possible and multiple avenues of public engagement (blogs, meetings, wikis, roundtables, etc) are used.
- The Planning Rule should provide opportunities for public comment that meet the stakeholders' needs rather than in ways that make sense to the Forest Service.
- The Mountain Bike Association has developed a great model for working with State Parks on recreational use (Trails Advisory Board), and would like to develop a similar working relationship with the Forest Service.

- The Forest Service needs to look at stewardship and other ways to provide incentives instead of using a regulatory and punitive approach. Self-policing by user groups has been quite successful in addressing rogue behavior and enhancing public perception.
- Every forest and grassland plan should include a plan for education and outreach. This should include natural resource issues, and information about timber harvesting, recreation, mining.
- The Planning Rule should include language to ensure that every Forest Service program area actively incorporates public opinion.
- Outreach efforts need to reach the user groups directly for input on how to manage the forests so that each user group's interests are addressed. Each plan should evaluate and mandate the appropriate level of use for each recreational activity, have measurable goals, and call for mechanisms to support multiple uses.
- The Planning Rule should require an educational outreach plan to improve environmental education in the communities and regions they serve.
- The Planning Rule should mandate public education, with a particular focus on young people. Have each of the 35,000 Forest Service employees spend one day a year educating children.
- Plans need to give people a reasonable understanding on what is going to happen on the ground.
- The Forest Service has done an excellent job of forest analysis across ownerships in the entire eastern hardwood region. The Forest Service should go a step further and actively participate in existing timber certification programs. Certification would make timber from Forest Service land more marketable, help educate people regarding sustainable forest management and promote the use of eastern hardwoods worldwide.
- The Forest Service should provide better support for volunteer programs, including supporting volunteer coordinator positions. The Planning Rule should address the power of 'Friends of' organizations to help bring together people with varying perspectives.
- The Forest Service should put more emphasis on educating and working with using volunteers to assist in implementing forest and grassland plans—especially on trail systems.
- The Planning Rule should include ways to incorporate volunteers in plan development and implementation –including for hands on restoration.

### VIII. Plan Implementation

- The Planning Rule should foster plans that can be implemented within a few years; it shouldn't take 15 years to implement a plan.
- Forest and Grassland plans give people a reasonable understanding and expectation of what is going to happen on the ground.
- Participants were frustrated that the Forest Service does not receive adequate
  funding to fully implement its management plans. Consequently, the Forest
  Service is not able to meet plan commitments and public expectations.
  Recommendations for addressing this problem were two fold: 1. Create "less
  ambitious" forest and grassland plans that are limited to management actions that
  the Forest Service has the resources to implement, and/or 2. Increase Forest
  Service funding so that forest plans are fully implemented.
- Monitoring is often called for in plans, but is not conducted, because of funding constraints. Congress should provide the funding needed so that the Forest Service can manage public lands well. Monitoring is an essential part of good land management.
- Forest Plans should be developed so as to mitigate the Forest Service's
  dependence on selling pulp and wood crops to meet Payment In Lieu of Taxes
  (PILT) to counties. This pressure to cut timber for money encourages Forest
  Service managers to favor logging over other concerns. Direct Market initiatives
  of value added products from in and around national forests should be actively
  promoted to reduce the pressure for pulp and timber revenue

#### **Conclusion**

Participants in the Region 9 Roundtable appreciated the opportunity to provide their perspectives to the Planning Rule development team early in the Rule writing process. Participants hope this collaborative approach to Rule development will be carried through the remainder of the Rule development process, as well as throughout plan implementation. A summary of participant evaluations of the roundtable is presented in Appendix B.

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## Appendix A

**Small Group Discussion Summary** 

#### FIRST AFTERNOON SESSION

#### **Plan Content**

**Small Group Discussion Summary** 

First Afternoon Session

Facilitator: Dain Maddox

Notetaker: Morgan McGough

Participants: Michael Dockry (US Forest Service), Paul Arlinghaus (Hoosier Mountain Bike Association), Edward Michael (Illinois Council Trout), Ty Warner (Chicago Metropolitan area for planning, Eric Gilbert (Center point Perspectives)

- 1. The planning rule should foster intergovernmental and interagency cooperation at the local, regional and national levels.
- 2. The round table discussions are great for getting opinions. What the roundtables aren't designed to do is achieve buy in and defense of the rule. The Forest Service should create a planning rule development stakeholder advisory group that includes forest users and state and federal agencies. This advisory group should then be actively involved throughout the rule development process, and might be responsible for assisting in defending and implementing forest and grassland plans. An example was given of a friends group in Idaho roadless rule committee in which 10-15 people include people from state management agency, interests groups (biodiversity, mtn. bike) that took ownership of the process and the results of the process.
- The planning rule should require extensive and meaningful stakeholder collaboration –
  including the creation of stakeholder advisory groups --throughout the process of
  developing and implementing forest and grassland plans.
- 4. The questions that the Forest Service raised in the Notice to Intent are a good starting point especially the focus on adjacent lands.
- 5. The new planning rule should retain the big picture ideas from the notice of intent re protection, restoration, all lands approach and adaptation to climate change.
- 6. The planning rule should foster plans that include clear and specific goals and objectives. Goals may vary from forest to forest.

- 7. The planning rule should foster plans that include strategies for measuring progress toward the plans' goals.
- 8. Forest planning processes need to engage user groups to ensure that the groups' needs are being met. Just because the map has a mountain bike trail doesn't mean that it meets the needs of the bikers.
- 9. The planning rule should require that plans make native species protection a high priority.
- 10. The planning rule should require that all forest and grassland plans identify and protect high quality lands and waters.
- 11. The planning rule should foster plans that consider management of Forest Service and strategies for achieving plan goals within the regional context. Trading of allotments to achieve ecological goals should be actively encouraged.
- 12. The planning rule should require that plans include historical and cultural context as well as landscape context, that informs plan development and implementation.
- 13. The planning rule should ensure that forest and grassland plans include flexibility to identify and respond to the needs of new user groups that arise after plan development. For example, mountain bikers consider themselves to be a low impact user group that want to be considered a distinct user group –not hiking and not forced into a group w/ mechanized and/or motorized users.
- 14. The planning rule should require that plans include a process for monitoring and measuring progress toward achieving the plan's goals and objectives over the course of plan implementation.
- 15. Desired future conditions should be articulated as clearly as possible so that strategies can be devised to measure progress toward these goals. Clearly articulated goals and a process for measuring progress toward those goals can also be useful in resolving the conflict that is inevitable with multiple uses. An example was given of the Elwood project in which storm water basins were constructed to rehydrate the prairie, then found that the basins had lead to unintended flooding.
- 16. The planning rule should require an educational outreach plan to improve environmental education in the communities and regions that they serve.
- 17. Plans should give people a clear understanding on what will happen on the ground.
- 18. Frustration was expressed that the Forest Service does not receive adequate funding to fully implement the forest and grassland plans that it develops, so the Forest Service is not able to meet the expectations that the public has regarding the management of these lands. Recommendations for addressing this problem were two fold: 1. Stream line forest and grassland plans so that the public can trust the plans will be fully implemented, and 2. Increase Forest Service funding so that forest plans are, indeed, fully implemented.
- 19. The Forest Service should put more emphasis on using volunteers to assist in implementing forest and grassland plans.

# Climate Change and Diversity of Plants and Restoration and Watershed Health, Ecosystem Services

#### **Small Group Discussion Summary**

First Afternoon Session

Facilitator: Caroline Hermans

Notetaker: Ashlee Ransom

Participants: Jerry Heinrich (Midewin Alliance); Abigail Lewis (The Field Museum); Eric Gustafson (Northern Research Station); Jerry Attere (WRD Environmental); Will Abbott (Society for the Protection of New Hampshire Forests); Martha Twarkins (US Forest Service)

- 1. The planning rule should not dictate unit of analysis (i.e. watersheds) but allow forests to choose the spatial units for analysis. In many parts of Region 9 there is low topographic relief and so analyses based on ecological units might be preferable to watershed-based analyses. (An example of tall grass prairie was given as not being associated with a watershed and so would not fit in the 'system' if watershed were was the spatial units used)
- 2. The planning rule should address transboundary issues. The planning rule should allow for private-public joint collaborations to address differences in management practices of adjacent properties that span different watersheds.
- 3. The planning rule should foster private-public joint collaboration to address differences in management practices on adjacent lands.
- 4. The planning rule should address urban forestry, and the connection between forest services lands and urban lands, as is currently being done vis invasive species.

#### 5. Restoration

- 6. The planning rule should define "restoration". If the Rule is going to have restoration as a goal then the regions need to be able to decide how to adapt to that goal. What are we restoring to?
- 7. Rather than having a one size fits all or Washington Office definition of restoration, the planning rule needs to allow for managers to highlight and develop a restoration plan for individual forests. The plan should allow restoration to be adaptable to different forests.
- 8. The planning rule should make it clear that we can't manage forests and grasslands for a world that doesn't exist anymore –it's not possible to return to pre-settlement conditions.

- 9. "Restoration" is used to mean a number of different things to different people. Other words that might be more accurate and/or meaningful include *resilience*, *rehabilitation*, *remediation*, and *reconciliation*.
- 10. Almost all Region 9 national forest lands have been degraded and cannot be "restored". Resiliency rather than restoration should be the goal.
- 11. The planning rule should emphasize outcomes, not process.
- 12. The planning rule should be written in a way that takes into account the substantial differences between eastern and western lands.
- 13. The planning rule should make explicit that forests look outside their boundaries for opportunities to provide societal benefit. For example, maybe the forest can provide ecosystem services that adjacent areas cannot. The Forest Service does not authority outside of federal land, but it can look for opportunities for collaborative planning and implementation.
- 14. The planning rule should allow for more flexibility. It should allow for Forest Service to be more responsive and adaptive rather than following strict rules.
- 15. The new planning rule is being developed in a way that is inclusive in engaging stakeholders at the beginning of rule development process. This may reduce litigation because everyone was involved from the beginning. However, in New Hampshire everyone was in on the plan in the beginning and still there were lawsuits.
- 16. The planning rule should require that each forest and grassland plan include a roadless inventory consistent with the standards/guidelines provided in the Land and Resource Management Planning Handbook. The plan should clarify that roadless inventories tools to be used for the sole purpose of guiding the plan and the planning process on the issue of recommending new Wilderness Area designations, and include clear guidance for their release, once Wilderness designation decisions are made.
- 17. The planning rule should include ecosystem services (e.g. carbon sequestration) and tools for allowing the monetary assessment of ecosystem services. It is important that plans quantify the benefits of forest resources, so that we have ways to evaluate different options.
- 18. The planning rule should note that wild land is scarce, and becoming more valuable. How can we describe this as value/benefits to constituents? We need ways to put value on wild forests.
- 19. Stakeholders are having their land appraised for development, how can 'keeping land as is' compete if there is no value for keeping it undeveloped?

### **Process Issues**

#### **Small Group Discussion Summary**

Time: First Afternoon Session

Facilitator: Kim Caringer

Notetaker: Judi Perez

Participants: Jenifer Durkin (US Forest Service), Marianne Hahn (Midewin Alliance Newsletter), Christine Jourdain (American Council of Snowmobile Associations), and Mary Krueger (The Wilderness Society)

- 1. The National Forest Management Act dictates that forest plans should be revised at least every 15 years. The Forest Service should be encouraged to amend plans more frequently, so plans are kept current and the revision process takes less time.
- 2. The planning rule should build in provisions for adaptive management that are flexible and easy to administer, and yet at the same time provide for consistency between plans.
- 3. The planning rule should include requirements for public participation and collaboration, and should ensure that as broad a range of stakeholders as possible and multiple avenues of public engagement (blogs, meetings, wikis, roundtables, etc) are used.
- 4. The planning rule should provide opportunities for public comment that are organized in ways that make it easy for stakeholders to engage in the process regarding the issues that are of most concern to them, rather than in ways that make sense to the Forest Service, but may not be how stakeholder approach the issues.
- 5. The planning rule should streamline the amendment process, but without bypassing the requirements of the National Environmental Policy Act (NEPA).
- 6. The Forest Service should conduct its own review of what has worked well, and what has not worked well in previous planning processes, and this analysis should inform the new rule.
- 7. The planning rule should not focus on making revision process *less expensive*, but rather should focus on making the process more *cost effective*.
- 8. The planning rule should not be hastily drafted. If more time is needed, the goal of developing a draft by the end of 2010 should be extended.

## **Recreation, Timber Harvesting and Sustainable Communities**

**Small Group Discussion Summary** 

Time: First Afternoon Session

Facilitator: Susan Terry

Notetaker: Doug Chaltry

Participants: Sara Earles (Hoosier Backcountry Horsemen), Trudy Fagre (US Forest Service), Eric Gustafson (US Forest Service), Wade Spang (US Forest Service), James Steen (Pike Lumber Co), Connie Tarplee (Hoosier Backcountry Horsemen), Royce Wood (American

Motorcyclist Association)

- 1. Overall the Notice of Intent was very weak on several issues like recreation and minerals. Multiple-use needs to be implemented to a far greater extent than it is currently.
- 2. Small scale harvesting is in the plans but never gets implemented.
- 3. Recreational strategies need to be better defined --specifically horse trails.
- 4. Tree harvesting is over-litigated, as are impacts of motorized recreation. This is due to overly-complex rule. Many small, family-size companies are heavily impacted by limitations on timber harvesting. The planning process should recognize that many people make their livings from the forests, including miners, recreation/tourism industry people, and harvesters.
- 5. For any consumptive use that leaves roadways afterwards (mining/tree harvest), the roads should be designed for other uses afterwards, such as trail use (horse, snow mobile, motorized, etc.).
- 6. The planning rule should be very general, leaving the specific details up to the individual management plans. Local communities should have much more say on the local forest uses. This will limit litigation.
- 7. The planning rule should be limited to statutorily mandated authorities. "Climate Change is outside the Forest Service's authority."
- 8. The planning process should incorporate social sciences such as economics need in addition to natural sciences when developing management strategies.
- 9. The planning rule should balance non-use and multiple use. Currently, non-use is being over-emphasized over other uses.
- 10. Citizen involvement in the planning process is crucial. Citizen advisory groups should be actively involved in all aspects of the planning process.

#### What Works and What Doesn't Work

#### **Small Group Discussion Summary**

Second Afternoon Session

Facilitator: Dain Maddox

Notetaker: Morgan McGough

Participants: Jennifer Durkin (Forest Service), Trudy Fagre (US Forest Service), James Steen (Pie Lumber), Sarah Earles (Hoosier Backcountry Horsemen), Connie Tarplee (Hoosier Backcountry Horsemen), Will Abbott Society for the Protection of New Hampshire Forests, Earnest Lehman (Franconia Minerals), Frank Ongaro (Mining Minnesota)

- 1. The planning rule should require that every forest and grassland plan meet the Forest Service's multiple use mandate and explicitly address these specific uses, including mineral extraction.
- 2. Previous plans have tried to do too much. The planning rule should foster forest and grassland plans that are clearly focused on what can actually be implemented.
- 3. Keep the planning rule straightforward and succinct so that there is less for the courts to interpret. There's too much ambiguity in previous rules ensure that the rule doesn't permit multiple interpretations.
- 4. The planning rule should include well-defined terms to avoid forest and grassland plans that are complex, complicated, and subject to litigation. Frustration was expressed with the amount of litigation has prevented plans from being implemented.
- 5. To be legally defensible, the planning rule should stay within its current statutory authority. The 2000, 2005, 2008 planning rules were too complicated and exceeded existing statutory authority.
- 6. Some of the issues that the Forest Service raises in the Notice of Intent (NOI) may exceed the agency's statutory authority (for example climate change). These "new" issues lead to a complex and ill-defined planning rule.
- 7. The planning rule should require that forest and grassland plans explicitly address mineral extraction. An example was given of a case on the Superior Forest. The plan revision did not expressly address mineral extraction, and this has lead to significant permitting delays that could have been avoided.
- 8. The Forest Service should seek to clarify the interplay between the new planning rule and the roadless rule so that it is clear how inventoried roadless areas can be managed once Wilderness designation decisions have been made by Congress.

- 9. Frustration was expressed that environmental groups seem to have more power than the timber industry. Someone commented that s/he has heard Forest Service staff say that the Forest Service would rather get sued by industry than environmentalists because the Forest Service can always win over industry.
- 10. The planning rule should address implementation to ensure that uses that are provided for in forest and grassland plans—including timber harvesting—are actually allowed, and that the plans are written in a way that reduces ambiguities and opportunities for successful litigation.
- 11. The planning rule should foster plans in which allowed activities are clearly defined. Multiple use areas should be encouraged over areas in which a single user group limits the ability of others to enjoy an area.
- 12. The planning rule should delegate plan implementation to the state governments.
- 13. The primary way that the new planning rule will affect forests and grasslands in Region 9 is through how it defines the process for plan amendments. The next round of plan revisions isn't likely to start until 2014-2015.
- 14. The planning rule should include clear timelines that limit the length of the plan revision process. Some suggested that the revision process be limited to at most two years; others felt that this was too short a time span and would result in staff time being drained from other important work to focus on planning issues.
- 15. The planning rule should foster plans that can be implemented within a few years; it shouldn't take 15 years to implement a rule.
- 16. The new planning rule should be written so that it encourages the Forest Service to educate and work with volunteers –especially on trail systems
- 17. Every forest and grassland plan should include a plan for education and outreach. This should include natural resource issues, and information about timber harvesting, recreation, mining.

## **Recreation, Timber Harvesting and Sustainable Communities**

**Small Group Discussion Summary** 

Time: Second Afternoon Session

Facilitator: Susan Terry

Notetaker: Doug Chaltry

Participants: Christine Jourdain (American Council of Snowmobile Associations), Mary Kreuger (The Wilderness Society), Gerald Heinrich, Ashlee Ransom (U.S. Forest Service), Jerry Attere (WRD Envrionmental), Paul Arlinghaus (Hoosier Mountain Bike Association), Mike Dockry

(U.S. Forest Service), Melissa Reichert (U.S. Forest Service)

- 1. The Mountain Bike Association has a great working model with State Parks on providing input on recreational use (Trails Advisory Board), and wants to move that association to the Federal level.
- 2. Multiple use is extremely important to sustaining communities, and those dependent upon the forests.
- 3. The planning rule should require that forest and grassland plans include master plans delineating which areas are best for which uses. Some uses are not appropriate in all areas. Trails are not appropriate for all trail users -- not all trails are appropriate for all trail uses. i.e., bike trails should be designed differently than horse trails, which may be different than motorized trails.
- 4. The planning rule should require that each forest and grassland establish recreational steering committees that include representatives of all user groups to properly plan trail use and other recreational uses.
- 5. The planning rule should not leave all the details to the individual plans. Outline clear requirements for developing master plans (such as trail plans) within the forest and grassland plans.
- 6. Collaboration among stakeholder groups, with multiple opportunities for input, is necessary to develop the forest plans.
- 7. The planning rule should "recognize the government to government relationship" with the Tribes. There should be a section of the Rule with very specific language that outlines and describes the Forest Service's relationship with the Tribes, and delineates the extent and methods of their consultation on developing Forest plans.
- 8. The planning rule should ensure that socio-economic concerns are meaningfully described and analyzed and in the forest and grassland plans, highlighting the economic benefits of ecological services and recreational activities.
- 9. The planning rule should include language to ensure that every Forest Service program area actively incorporates public opinion.

10. Outreach efforts need to reach the user groups directly for input on how to manage the forests for their interests. Each plan should evaluate and mandate the appropriate level of use for each recreational activity, have measurable goals, and call for mechanisms to support the use.

# Climate Change & Diversity of Plants & Restoration and Watershed Health, Ecosystem Services

Small Group Discussion Summary

Time: Second Afternoon Session

Facilitator: Kim Caringer

Notetaker: Judi Perez

Participants: Jerry Attare (WRD Environmental), Trudy Fagre (US Forest Service), Eric Gustafson (US Forest Service), Marianne Hahn (Midewin Alliance), Edward Michael, Illinois Council of Trout Unlimited), Royce Wood (American Motorcyclist Association)

- 1. Because climate science is so new and rapidly changing, plans need to build in flexibility regarding ways to adapt to climate change.
- 2. Plans should focus on diversity, adaptation, and what the Forest Service and others have done that is climate smart.
- 3. Focus on ecosystem functionality rather than species specific management.
- 4. Focus on *resilience* on Federal lands looks more at genetic diversity versus species diversity. Specific diversity may help with adaptability. Build in sustainability to provide adaptability.
- 5. Climate change is an important issue but shouldn't further bog down the planning process by making the process too complex or politically charged.
- 6. The planning rule would be remiss if did not address climate change. Provide enough guidance to allow Forests to address at the plan level –don't be too prescriptive. Need to address climate change to ensure that the Forest Service manages lands in a sustainable way.
- 7. Climate change amplifies issues already being dealt with. Don't make the issue a contentious one that ends up impeding forest planning.
- 8. The planning rule should require habitat and species monitoring, but should let individual forests and grasslands select the type of monitoring that is most appropriate.
- 9. Monitoring is often called for in plans, but is not conducted, because the Forest

- Service is not adequately funded. Congress should provide the funding needed so that the Forest Service can manage public lands well. Monitoring is an essential part of good land management.
- 10. The planning rule should include minimum monitoring requirements, and forests go beyond the minimum to do more, if feasible. The planning rule should encourage forests to be innovative in funding monitoring.
- 11. The planning rule should foster methods for regional data sharing and partnering opportunities with local organizations. Partnering will give greater staff capacity to access quicker and more up-to-date information and the ability to gain a larger view of what is going on at the landscape level.
- 12. The Eastern Region is –or used to be-- a leader in research partnering.
- 13. Apply accepted best management practices (BMPs) to gather information.
- 14. The planning rule should set national Forest Service restoration priorities. These should include a requirement that unmanaged, illegally created roads and trails be closed, and that the travel management rule be followed.
- 15. The planning rule should to be written in a way that recognizes the differences of eastern and western regions regarding restoration.
- 16. Restoration efforts should not reduce public access to Forest Service lands.
- 17. The planning rule should mandate public education, with a particular focus on young people. Have each of the 35,000 Forest Service employees spend one day a year educating children would have a huge impact.
- 18. The planning rule should include ways to incorporate volunteers in plan development and implementation –including for hands on restoration.

## **Evening Discussion Summary**

Time: Evening Session	
Topic: Issues Raised by the Deputy Regional Forester and Participants	
Facilitator: Cindy Cook	
Notetaker: Judi Perez	
Participants: All Present	

- 1. The Forest Service needs to define restoration to avoid litigation. What standards or conditions are the goal Pre-Columbian standards, or something else?
- 2. The planning rule should focus on the goal of *sustainability*, rather than *restoration*.

- 3. The Forest Service should focus on watershed, water quality, and water retention issues as it considers how to address climate change.
- 4. Restoration is a dangerous term in Region 9. Restoration often gets confused with "return to fire dependent ecosystems" in the west. Because many Region 9 ecosystems are not as fire dependent as western regions, this paradigm can be problematic.
- 5. In the East, *system resiliency* is perhaps a better goal than *restoration*—particularly if restoration carries with it an implied return to fire dependency. These are important distinctions because they affect resource allocation and future Forest Service investments. If you build fuels into the plan rule it will create a strong western bias limiting resources available to eastern national forests.
- 6. East of the Mississippi watershed enhancement and clean water are more important than fire dependency and fuels management.
- 7. The USFS needs to look at stewardship and other ways to provide incentives instead of using a regulatory and punitive approach. User groups self-policing has been quite successful in addressing rogue behavior and enhancing public perception.
- 8. Active collaboration with user groups should be built in throughout the plan development and implementation process. For example, when the Forest Service is planning a timber harvest that will result in a trail being closed to a user group, it should collaborate with the user group to ensure that users are informed. The organized user groups could help distribute that information to reduce conflicts and provide other options to recreate.
- 9. The planning rule should require the integration of road construction and long term recreational trail system planning, so that new roads are built in a way that they can serve other purposes in the long run.
- 10. The Forest Service should provide better support for volunteer programs, including supporting volunteer coordinator positions. The planning rule should address the power of 'Friends of' organizations together people w/ varying perspectives.
- 11. The planning rule should require better links between the information collected during the plan development process and the resulting plans. Social assessments, species viability analysis, need to show how these are related to the plan that is produced. There is a lot of information collected that doesn't seem related to the actual plans.
- 12. Words like recognize and consider in Forest Service speak do not mean much. The planning rule should use words like *shall*, *must*, *incorporate*, *influence*, *or impact*. NFMA includes language about how to do an assessment the information matters.
- 13. The issues that "drive" revision of any given plan should be clearly articulated, analyzed and addressed in the plan.
- 14. Keep the planning rule concise and consistent, and build in flexibility so each planning process can respond to local needs. There needs to be consistency across the system, but flexibility at the local level.

- 15. The planning rule should provide the framework the structure of what is included in forest and grassland plans. The rule should specify *what* to address, but leave the *how's* up to individual forests and grasslands.
- 16. Other federal agencies are grappling with how to address climate change, the Forest Service is behind other agencies and should develop a plan for interacting with other agencies regarding climate issues.
- 17. The planning rule should focus more on *stewardship*, and less on *use*. Good stewardship is using the resources without doing harm. Some uses have adverse impacts, need to reduce those uses and enhance positive impacts.
- 18. The forest and grasslands plans should address *symptoms and affects* of climactic warming. Managers tend to address symptoms and not the issue of climate change.
- 19. The Forest Service has done an excellent job of forest analysis across ownerships in the entire eastern hardwood region. The Forest Service should go a step further and actively participate in existing certification programs. Certification would make timber from Forest Service land more marketable, help educate people regarding sustainable forest management and promote the use of eastern hardwoods worldwide.
- 20. The Forest Service's role in public education is very important.

## **Summary of Comments Received On-Line and in Writing**

- 1. The planning rule development process should include far more events and far longer comment periods than those currently proposed.
- 2. Public outreach leading up to and during the public comment period for the proposed rule should be expanded and should include economical automated calling and brightly colored post card invitations.
- 3. The planning rule's highest priority should be preserving our existing wilderness and roadless areas for future generations.
- 4. The primary use of the national forests must be "quiet" recreational pursuits such as hunting, fishing, hiking, backpacking, camping and water sports. Extractive industries, motor sports and development should be allowed only in those rare instances in which they do not adversely affect "quiet" recreation.
- 5. The planning rule should acknowledge value of wilderness and roadless areas is not measurable in dollars.
- 6. The National Forest Planning Rule, Clean Water (Act), wildlife habitat and roadless area protection will need financial structural adjustment of the Forest Service to be fully successful. The Planning Rule needs to give NFMA teeth and more funding other than from timber sales in order to protect clean water, rivers, streams, rare plants, animals and habitat in increasingly fragmented forests in the northeast and elsewhere.

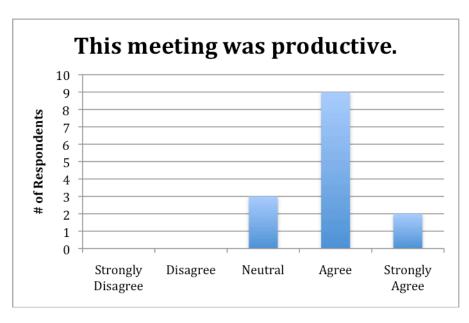
- 7. Forest Plans and projects should maintain actual viable populations of vertebrate and plant wildlife based on scientifically up to date monitoring methods. The pine marten, yellow birch, fresh water fairy shrimp, mussels, dragonflies, and freshwater sponges should be protected.
- 8. The planning rule should clarify and strengthen the population viability standard so that it's clear that the goal is viable population numbers *across the planning area*.
- 9. Forest Plans should be developed so as to mitigate the Forest Service's dependence on selling pulp and wood crops to meet Payment In Lieu of Taxes (PILT) payment expectations to counties. These counties are where forest decision makers, biological, families, friends and neighbors live. Pulp logging is a primary ingredient to Forest Service and county budgets. This pressure to cut timber for money encourages Forest Service managers to favor logging over other concerns. Regular GAO report cards on decision, disclosure and monitoring bias and adequate monitoring funding should be issued with link buttons on all USFS websites would safe guard forests. Overcoming this conflict of interest will require Forest Plans to vigorously pursue other funding sources, including selling higher priced value added wood products. Direct Market initiatives of value added products from in and around national forests should be actively promoted.
- 10. Forest Plans should call for multifaceted funding for easements and bio-reserves built around shoring up county budgets, community development and Forest Service monitoring and operations budgets. The USFS should provide opportunities that vigorously stimulate and tap into the enormous public support for forest protection. Plans should include selling easements and adoptable habitat acres to rest or protect national forest habitats. Public and private entities could then buy easement leases to build carbon credits and green credits for protecting wildlife while generating funds for county budgets, local community development including value added logging initiatives. A number of Forest Service initiatives—including comment period outreach, monitoring, controlled burns and road deconstruction of short-term deferrals and longterm set asides like roadless areas, bio-reserves and even new wilderness -- could be co-funded this way.
- 11. Major amendments to and deviations from a Forest Plan should require a heavily publicized full NEPA comment period, so that stakeholders have the opportunity to comment. An example was given of increased timber sales on the Chequamegon Nicolet National Forest where an extra 242,000 acres of forest land was opened up for logging-adding significantly to the 864,000 acres the plan already made available to logging, without stakeholder involvement.
- 12. Forest plans should consider a number of factors including the affects of patch size, connectivity of protective canopy closure and availability of Old Growth when assessing a project's impact on habitat.
- 13. The planning rule should respect how user groups self-identify. For example, mountain biers do not want to be categorized as "motorized" or "mechanized".
- 14. Forest planning processes should actively engage existing groups with an interest in forest land management, including trail advisory boards at the state level and user groups.

- 15. Designated uses in management areas should be based on science. For example, mountain biking may be appropriate in some wilderness areas, and not in others.
- 16. The planning rule should address how the Forest Service will manage lands on split estate lands (see the Minard Run decision re the Allegheny National Forest).
- 17. The planning rule should focus on providing consistent, reliable and sustainable sources of fiber to local and worldwide markets. Consistent, reliable fiber sources are critical to local economies.
- 18. The planning rule should include a provision requiring unsuccessful litigants of Forest Service planning processes be held financially responsible for lawsuits that are found by the court to be frivolous.

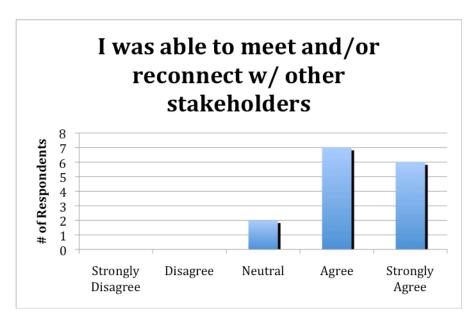
## **Appendix B**

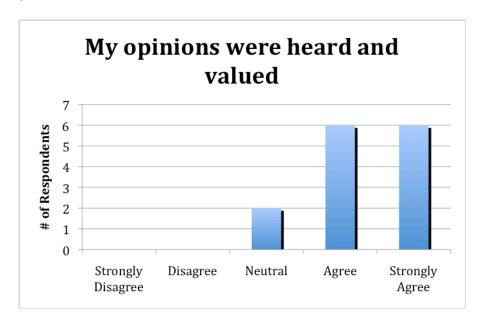
## **Roundtable Evaluations**

1

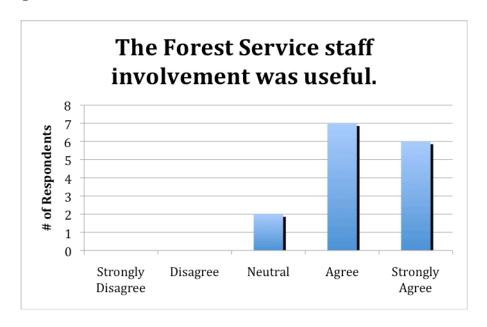


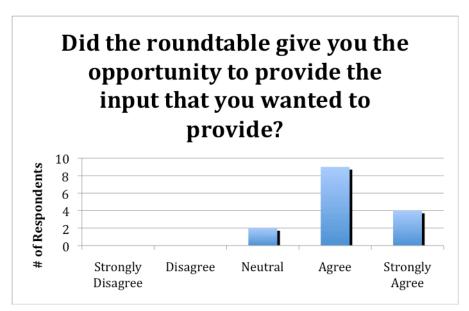
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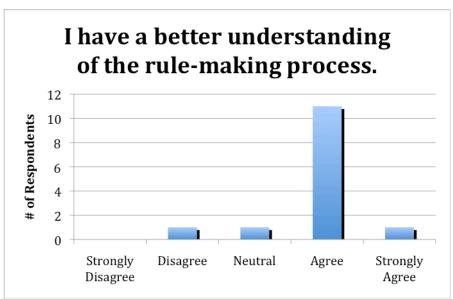


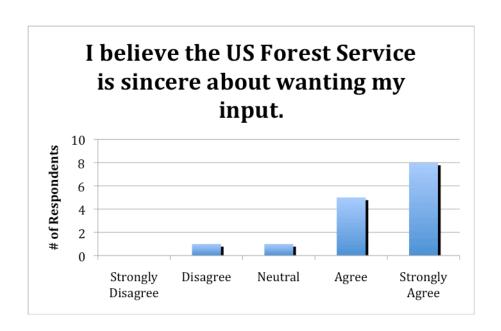


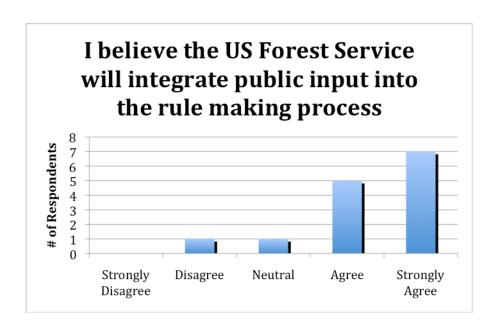
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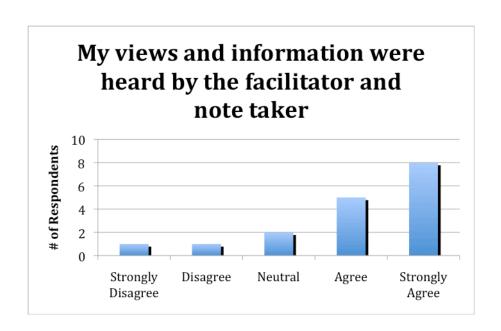


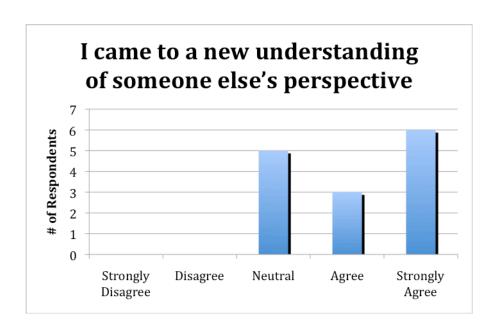


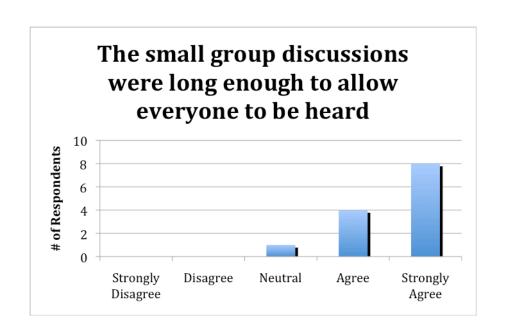














#### **Comments from the Roundtable Evaluation Forms**

The following comments are transcribed verbatim from roundtable evaluation forms.

- I think it would be useful for the planning rule writing team to post sections of potential draft rule language to get feedback on what language might work and what language might be problematic. This would be posted on a blog outside the NEPA commenting process and might help ID problems/issues/concerns before he draft comes out.
- Region 9 encompasses a lot of the country. A meeting in Chicago, downtown on the magnificent mile at an expensive hotel and the agenda out only 48 hours before the event was guaranteed to result in low attendance.
- Need to improve future meeting communication and locations.
- Forest Service and facilitators could put out a "help us get attendance" package for groups to use to generate interest.
- Stronger identification of why we were brought together would be helpful.....Not familiar with context of the meeting enough to know what I should be commenting on exactly... But glad that you're doing it! ©
- Going forward, as you discuss all issues, you MUST include minerals in the discussion. Meetings, roundtables, etc. Nowhere was minerals mentioned in any of the materials.
- Look forward to reviewing draft planning rule.
- Better powerpoint presentations. Too much info per slide. Couldn't read much of it.
- Evening plenary session did not feel as productive and the small group discussion
- Distribute a list of attendees
- Encourage thinking outside the box
- Keep stakeholders informed and involved.
- I would like to see the rule allow states to enforce under the Federal Guidelines, with authority to apply the plan in a manner consistent with sustaining the eastern hardwood region.
- The rule development process needs to be better grounded in NFMA (the National Forest Management Act) and its requirements. Give the public the sideboards in NFMA for the new rule.

#### **On-line comments**

If you did have trouble accessing the online content, please indicate what challenges you faced.

"Getting connected with out Jason's help. He did a nice job of helping out but shouldn't had too."

Use the space below to indicate any feedback you may have about your participation in the online meeting.

"I was able to access what was posted just fine, but it was pretty passive involvement. I have

participated in webinars where documents are live and edited on screen, so, for example, the flip chart content of the physical meeting could also be put up on line so that we can see it and get some flavor of the live discussion. Another technological feature I have used is for the on line participants to be able to listen in and participate in small group discussions using a polyphone (or conference call line).

Maybe some of what I describe above will happen during the evening discussions, which I can't participate in.

Please do continue to offer the on line option - it is valuable and can work with improvements."