



Meridian Institute

Connecting People to Solve Problems

U.S. Institute for



Environmental Conflict Resolution

Udall Foundation

# Forest Service Planning Rule: Fourth National Roundtable

## Discussion Summary

July 29-30, 2010

Renaissance DuPont Hotel

*Note: This document is a high-level summary of the discussions that took place during the Fourth Roundtable. It is intended to capture in general terms the themes and major ideas that emerged during the meeting, not every single point that was raised. Any omissions or errors are the responsibility of the Meridian Institute and the US Institute for Environmental Conflict Resolution.*

# Summary of Input from Day One Breakout Group Discussions

On the morning of Day One of the Roundtable the Forest Service provided an overview of the proposed draft planning Rule framework, and provided detail (in a discussion guide and in a presentation) about several key sections (collaboration and public involvement; monitoring; recreation and other multiple uses; plant and animal diversity; and, restoration and resilience). The afternoon was devoted to break out group discussions of those sections. Each break out group addressed three questions for each section:

- Are there concepts that need clarification? Is the language clear (and implicitly, what would be your suggestions to improve the language)?
- What is your feedback on the section, and in particular are there any fundamental concerns or gaps?
- What are your suggestions for how to address concerns and gaps?

The combined feedback from all the breakout groups is summarized below for each key section.

---

## Collaboration and Public Involvement

### Is the language clear?

#### *Clarification on Consultation and Collaboration with Tribes, States and Local Governments*

Add more language that:

- Distinguishes between the unique responsibility and legal requirements the Forest Service has regarding government-to-government consultation, and defines the different ways to collaborate with Tribes as original stewards of the forest resources.
- Acknowledges different levels of the relationship between Tribes, and that Tribes participate on national forests both as “practitioners” according to their traditional and contemporary practices *and* as an underrepresented community.
- Acknowledges that there are multiple roles that Tribes have, from government to government, to resource co-managers and co-managers of the resources in traditional practices. Recognition of tribal/treaty rights are maybe not as strong as some would like.

Concerns regarding effective Tribal engagement in this process:

- How can the Forest Service effectively engage and address concerns of Tribes that are not Federally recognized, e.g. the Seminole Nation? How can they be included in decision making, taking into account the American Indian Religious Freedom’s Act?

- The discussions that are happening at Tribal roundtables are not being transferred into the discussions of today. Have all the roundtables merge at point (preferably not at the end of the rule-writing).
- Strategies for consultation or addressing sacred sites should be reviewed alongside the planning rule and incorporated into what plans should address.
- Add text from the first Tribal conference call: “the Plan will not abrogate or diminish indigenous land uses, will not infringe or diminish the rights of indigenous people and their right to follow their way of life”.

Clarify public, state, and local government involvement and consultation processes.

- Include coordination with state forestry entities and state foresters.
- States and local governments should be included as partners and collaborators. “Cooperating agency status” doesn’t take the place of coordination with states or local governments.
- There needs to be clear integration with local and state governments.
- Some counties are interested in integrated planning, or, at a minimum, in the recognition of their interests, and all interests of their communities, by the Forest Service.
- Local governments and states should be included as partners.

### *Accountability*

- Accountability language is missing in Rule language. It needs to be clear where there are standards, guidelines and best practices for Forest Supervisors so that the process is clear and consistent.
- There needs to be parameters to better define/guide coordination and collaboration, including clarification up front as to where decision authority rests (Forest Supervisor, Regional Forester or Chief?), the degree of flexibility/discretion and the issue/appeal risk associated with that.

### *Procedural Clarity and Integrity*

Clarify logistics and infrastructure of collaboration.

- Is there a mechanism in place for determining the basic criteria of processes or stakeholders?
- How does the process protect against foregone conclusions?
- Describe decision space: how does collaboration relate to and link with decision making, science and legal dimensions, and goals? What are the sideboards?
- Consider use of advisory committees such as Resource Advisory Committees (RACs), and minimum requirements.
- Balanced and effective stakeholder identification and engagement is necessary.

- Need more clarity/direction for encouraging appropriate stakeholders to get involved and for understanding how that participation will be balanced and weighed.
- We don't get at the national/local distinction and we need to have that incorporated.
- Nothing articulates the relative value for managers of the input from different stakeholders, nor the means of engagement (i.e. how will form letters be weighted relative to participation in collaborative processes, local versus national or regional interests, etc.)?
- Do you envision collaborative groups having a special role versus the public? There is a lot of concern that people can't participate in all these groups and will that disadvantage them?

**What is the general feedback; are there gaps or fundamental concerns with the approach?**

- Expand identification processes and engagement of a broader set of stakeholders, including youth and underserved communities. Utilize social organizing tools and audience appropriate outreach mechanisms (e.g., Tribal languages and means of communication, Tribal radio, non-English language radio, social media, etc.) and information should be put out in many different forms and across many sources so that it is accessible to all participants
- Add a bullet under *Providing Opportunities for Participation: Engaging non-traditional, under-served, youth and other groups*. The responsible official shall provide for and encourage collaboration and participation by non-traditional, under-served, youth and other groups. They should conduct research to determine who to engage using tools such as community organizing principles, community surveys, new and cultural media sources and community liaisons. Where possible, the Forest Service shall consider barriers to participation such as socio-economic status when designing ways to engage these groups.

**What suggestions are there for addressing gaps and fundamental concerns?**

- Can the Rule encourage more active sharing of the workload in developing a plan, particularly in assessment and monitoring? For example: subplanning teams composed of scientist members from each stakeholder group to conduct assessments; or an outside team composed of federal, local, state, Tribal, environmental scientists to perform monitoring.
  - Forest Service leads the effort but the workload and development of the info are shared. Are there legal barriers with the Forest Service partnering with NGOs, Tribes or environmental groups in developing an assessment for biodiversity, cultural resources, etc?
- Clarify how objection process will work and how it fits with NEPA, i.e. that after the final NEPA document is completed, the responsible official will identify the tentative decision, and provide the opportunity to object to the decision.

---

## Monitoring

### Is the language clear?

- Indicator language should be consistent with key ecological species language.
- Standardize data collection across forest plans.
- What role does monitoring play in “revise and amend” stage? Monitoring should be in the “revise and amend” part of the process.
- What are standards for monitoring?
- Is the intention to monitor episodic problems?

### Are there gaps or fundamental concerns with the approach?

- Need more specific language regarding key ecological systems and desired conditions. What should USFS manage and monitor for (e.g., applicable water quality standards; riparian habitat conditions, etc.)? Need measurable objectives for monitoring that meets the law, where defined.
- State assessments and strategies identify priority landscapes and threats within each state. Consider state strategies that are occurring outside of the forest unit boundaries in doing forest planning.
- How will landscape versus project scale monitoring be determined? How will forest supervisors determine, or coordinate to determine, the landscape scale issues relevant in their specific plans?
- Unit monitoring program must address multiple use and recreation which are not in the list. Need for data/methodological comparability across units and landscapes to allow scalability. Create data-management system and analyze sets of data.
- Adaptive management is not mentioned in the rule and the relationship to monitoring needs to be explained. Why?
- How will monitoring data be developed? Standardize a methodology for monitoring.
- How can the public participate in monitoring?
- How can Tribes get monitoring of species that are critical to their subsistence included? Plans must acknowledge the trust and other legal obligations to monitor critical subsistence species pursuant to treaty and other Tribal rights.
- How will monitoring data be reported?
- Need monitoring specific to key statutes, e.g. Clean Water Act (CWA), Clean Air Act (CAA), Endangered Species Act (ESA) and other specific language.
- Make water monitoring data available in real time. The Environmental Protection Agency (EPA) has their monitoring data real time. It is a good example of what should be done.

- Monitor relevant social and economic factors.
- How will monitoring connect to decision making? Focus on answering yes or no questions in monitoring first to conduct the scientific process.
- Funding levels need to match any required monitoring. Basic monitoring must be based on historical funding or expected budget.
- What happens in the interim while monitoring is happening? What can you do while you're waiting on the data assessment?
- Make sure that projects don't go forward unless monitoring and funds are available.
- Climate change must be monitored; prioritize what needs to be monitored.
- Better connections between monitoring and research branch.
- Make sure that monitoring is expressed in diagram; feedback of monitoring needs to be captured in a second diagram.

### **What suggestions are there for addressing gaps and fundamental concerns?**

- Ensure that traditional ecological knowledge of Tribes is incorporated in all sections of the rule, for monitoring and data collection. Do not publicize important culturally sacred sites; ensure that the Rule is consistent with the Farm Bill requirements for privacy and confidentiality.
- Need to think carefully about requiring monitoring at all three levels – since units are different sizes and the issues may be at different scales. It may not be reasonable to put requirements for project level monitoring in the plan. Maybe include requirements at the watershed scale.
- Describe how to respond fast enough once you identify a problem through monitoring (in amending a management plan on project, landscape level)? Provide structure to identify warning signs of problems and the response.
- Agencies/programs should coordinate efforts in monitoring and data collection, establishing a unified monitoring protocol among the agencies. Decide what is a “shall” and a “must” for monitoring.
- Create a larger role for the research stations. Planning rule should make clear that not everything can be solved locally and the research stations can help.
- Funding requirements in the rule will exacerbate the problem. If research stations get involved, that comes right out of the National Forest System budget.
- If the agencies expect the public to be involved, they need to provide funding to support public involvement in monitoring, so the public is not bearing the burden themselves. Provide support and training to get the public involved in monitoring.
- Annual monitoring evaluation information (and all monitoring information) should be available in multiple forms, languages and locations that are appropriate to the local communities that may need to access those communities.
- Use different media methods/languages to present information to the public.
- Possibly hire, use a local intermediary or community liaison to engage with local groups. As communities grow, this could become a permanent position.

---

## Recreation and Other Multiple Uses

### Is the language clear?

Define or further explain terms such as: desire future conditions, niche, suitability (and capability too), assessment (and how assessments from different sources and topics fit together), ecosystem services, heritage, native, and historic.

Need to clarify how and by whom are priorities set among multiple uses?

- For example, how does a collaborative process prioritize between Native American spirituality and various types of recreation and logging?
- These determinations should be made at the forest plan level in the context of that forest's social, ecological, economic circumstances.
- Just because there CAN be multiple uses on a piece of land, does not mean there should be.

How should the rule prioritize social, economic, and ecological values? Various perspectives included:

- Ecological values as a foundation,
- All intertwined,
- Sustainability should be the priority,
- Special role that timber plays in NFMA.

How is recreation valued in regard to other multiple uses?

- Simplify "recreation and multiple uses" to "multiple use" throughout document.
- Recreation should be a separate and unique section.
- All multiple uses should be given equal weight in accordance with NFMA.
- Tribal traditional and contemporary rights to National Forest resources are not "multiple uses"; they have a greater weight than use of public lands by the general public and should be prioritized pursuant to laws, treaties and other agreements.
- Definition of recreation should depend on the local user groups.
- List all user groups. Don't single out certain ones.

How is suitability defined?

- Suitable to whom?
- Need spatial representation and layered maps to set priorities and direction.
- Clarify how the recreation suitability analysis should be done. Explain what the criteria are and how they will be integrated.

How are land use allocations made?

- How identified and how resolved?

**What is the general feedback; are there gaps or fundamental concerns with the approach?**

- It is essential to clarify throughout the rule what is mandatory versus optional.
- Don't hold the Forest Service responsible for economic issues they don't control.
- Need consistent language for how to address socioeconomic framework.
- Conservation education needs to be broadly defined and consider its audience.
- Energy and minerals are a major gap throughout the document.
- Explain how cost-benefit analysis would be done.

**What suggestions are there for addressing gaps and fundamental concerns?**

- Add additional language about treaty and other rights, sacred sites, trust obligations; add prioritization of Tribal rights.
- Rule should tie in with the National Open Space strategy, green infrastructure, conservation of open space.
- Consider using motorized and non-motorized language instead of mechanized.
- Use data from other governments, private, and non-profit stakeholders to conduct assessments. Ensure consistency in data gathering approaches.
- Define "desired conditions" on multiple levels from the project level up.

---

## Plant and Animal Diversity

**Is the language clear?**

Concepts that would benefit from additional clarification include:

- The purpose and approach to using "focal" species as the coarse filter and species of concern / T&E species as the fine filter;
- How the coarse and fine filter approach differs from management indicator species (MIS) and how the USFS will identify what the focal species are? Need to define the criteria so you don't have a hodgepodge of species like was done with MIS;
- What happens if it is not possible to achieve species viability; and
- How trust responsibilities for certain species resulting from treaty and other rights (e.g., salmon) will be addressed in the rule.

**What is the general feedback; are there gaps or fundamental concerns with the approach?**

While some questioned why plant and animal species diversity is receiving so much attention; many provided positive feedback that the approach to plant and animal diversity described in the Discussion Guide is moving in the right direction.

In particular, several people liked the language that acknowledges that there will be factors that impact species viability that are beyond the control of the Forest Service.

Several people liked the shift from using species and populations as a focus to using ecological conditions and habitat. This approach helps to define the important functions of the systems, as well as the products and services the system will provide and puts them into the contexts of the broader influences.

Many, although not all participants, liked the shift from only focusing on vertebrate species in the 1982 rule to allowing all species to be candidates for focal species as the course filter.

### **What suggestions are there for addressing gaps and fundamental concerns?**

In some cases, the Forest Service needs to go beyond viable populations and move toward sustainable populations. For some species, viability is not enough because of their critical importance to Tribal and local communities (e.g., deer as a subsistence resource).

The Rule should specify the criteria and use a practical approach to identifying focal species as this will be key to getting the most focused and effective monitoring.

The Rule should specify how species that are related to trust responsibilities resulting from treaty and other rights will be addressed in forest plans.

---

## **Restoration and Resilience**

### **Is the language clear?**

- The definitions of resilience, health, and restoration all need further tightening, clarity and specificity.
- Confused about the way that desired future conditions, restoration, and resilience all fit together. There should be greater clarification and more explicit language on this issues.
- Avoid using the word “healthy” (page 43), because it carries different expectations. [Alternative view: *resilience* means nothing to the public, while *healthy* seems to resonate.]
- Applaud the use of resilience as an important principle. The words resistance, resilience, and transition should, however, be used consistently with the way they are outlined in the Forest Service Roadmap for Responding to Climate Change.

### **What is the general feedback; are there gaps or fundamental concerns with the approach?**

- Concerned about the idea of resilience. Climate change is going to drive change in forests; trying to manage forests to absorb a major shift will change the forests, which raises the question of how to define desired future conditions.

- Roads are often the key element that link aquatic and terrestrial habitats. Need more explicit standards for “right-sizing” the quantity and character of roads that are in a forest; also need to include some optimal road standard.
- What is the role of fire in the rule? Clarify and recognize impact/effects of fire management plans; make sure they are consistent with forest plans. There are opportunities in the collaborative process to educate the public on the role of fire. The rule should also recognize traditional tribal fire management processes.
- Restoration is a process that shouldn’t be required, but recommended. We should stop focusing on the concept of restoration, and focus more on desired conditions. There are a lot of forests that don’t need to be restored.
- Restoration – are we trying to get back to some historic point? Scientific literature suggests that trying to achieve ecosystem structure and function that is based on a specific historic reference point is impossible. While historical reference points are important and helpful, we need to be careful about this concept of restoration and not make going back to a specific historical reference point as the goal.
- There is not enough mention of *passive* restoration, e.g., discouraging development near the forest, or reducing livestock permits.
- NFMA requires identification of areas that are unsuitable for timber production, which could imply that timber production should occur in all other areas. Need to ensure that timber harvesting isn’t recommended to achieve restoration and resilience goals. Sideboards are needed to ensure that the concept of restoration is used appropriately.
- Restoration assessment needs to identify stressors and how to relieve them
- There is no discussion of sacred sites for indigenous people. Many Tribes possess knowledge of their local forests that could be integrated with more contemporary science.

#### **What suggestions are there for addressing gaps and fundamental concerns?**

- Consider human values (social and economic) as well as ecological values; what do restoration and resilience mean for forest-based communities?
- Themes of restoration and resilience should be included in the purpose and principles section of the Rule, in describing what the forest plans should provide.
- One of the chief reasons for management is delivery of ecosystem services. This should be added as the underlying objective.
- Need more emphasis on how the plan will contribute to restoring water resources, e.g., the network of riparian areas that are adequate to protect the integrity of the watersheds, and the requirement to maintain quality watersheds and restore damaged ones. Also need to clarify that the Forest Service will adhere to Clean Water Act standards.
- Need to acknowledge stressors, and include language about how to set priorities.
- Could have national standards that are actual standards that could be modified later on; it’s important to have standards.

- Acknowledge that resilience relies/depends on a data-rich process, a collaborative process, and an adaptive process (perhaps address in the preamble).
- Resilience can be measured if indicators are determined as part of the monitoring plan developed in the NEPA process (revise/amend phase). Indicators should be a range of values based on the best available science.

## Summary of Input from Day-Two Break Out Group Discussions

After Day One of the Forest Service Fourth Planning Rule Roundtable, Meridian Institute prepared a high-level summary of the Day One break out group discussions and distributed it to participants. On the morning of Day Two, the Youth Caucus presented a report of their deliberations, and the Forest Service gave a more detailed presentation of the Planning Rule Framework. The breakout sessions that followed provided an opportunity for participants to refine and build on the feedback from Day One, taking into account the Summary Document from Day One, the Youth Caucus presentation, and the Forest Service framework presentation. Each breakout group decided on its own what to focus on. Following is a summary of the Day Two breakout discussions by topics covered (not by individual break outs), including some clarifications of the Day One Summary.

---

### Framework of the Rule

The overall feedback was very positive. Many people expressed appreciation for the additional, in-depth presentation of the framework for the draft proposed rule, which represents a distinct shift from previous planning efforts. Some were excited about the shift, while others expressed some reservation. Specific comments on the framework included:

- State the purpose of each part of the planning cycle up front in the Rule, especially state the purpose of monitoring in terms of expected benefits such as enabling the agency to learn from stewardship successes and failures, determining the need to adapt the monitoring program (questions and methods), and facilitating continual improvement of Agency capacity and effectiveness of organization, budget, policy, management strategies as well as “changing the plan.”
- The wheel diagram, with the three phases of monitoring, assessment and revision/amendment, appears to some as “endless planning.” It was suggested that in order for forests to not always be stuck in a planning process, there needed to be clear scope and possibly time frames for each of the phases, which should also explicitly include implementation. Consideration should also be given to a “trigger point” that would indicate when to initiate a revision, and be tied to the role of science and collaboration in setting those triggers. It was also noted that a continuous and on-going

process could provide “continual learning”, which will allow the Agency to continue to mature and change over time.

- There was tension in the discussions about the desire for simplicity (i.e., the Rule should be easy to understand and simple to implement in order for it to be successfully utilized across the country), and detail (i.e., everything that is a requirement for all Forests should be in the Rule itself versus left to directives).
- Some were concerned that there was a bias towards active management and indicated that not everything in a forest needs to be actively managed. Passive management is sometimes the best approach.

Questions about the framework and/or needing further clarification included:

- Where and when public notice will happen;
- What about the framework is in the planning Rule and what is in the forest plans themselves;
- How the statutory requirements of compliance with other relevant and cross-cutting environmental laws are addressed in the Rule;
- How the Federal Advisory Committee Act will affect the collaboration process;
- How the multiple use mandate is addressed;
- How the two-tiered approaches to monitoring and assessment will be developed; and
- How forests that have current plans will be transitioned over to this new planning framework.

---

## Collaboration

Collaboration was discussed in depth throughout the Roundtable. Many participants expressed interest in, and excitement about, the collaboration emphasis in the proposed Rule, and the collaboration process that has been utilized to date in developing the draft Rule. They said that the ability to respond to draft concepts is really helpful. In the past, when the only option was to respond to the draft proposal, it was hard to influence changes. The roundtable process has been helpful on a number of levels, not the least of which is to have the scientists interact with stakeholders so we can learn more about the planning process. The sense was that if this process is an example of what the Forest Service is anticipating for collaboration on the forest level, it is hard not to be optimistic about it, especially the opportunity to comment on plans before they are set in stone. There is a sense of involvement, and that is a good thing. In addition to the positive feedback there were a few concerns expressed, and suggestions offered to strengthen the collaborative approach:

- Collaboration is somewhat new territory for the Forest Service and there are a lot of unknowns in the process. Some were concerned that there is not enough expertise broadly throughout the Forest Service to effectively implement this type of approach. It will be important to build collaboration expertise in the Agency.
- Some feared that collaboration could lead to local control at the expense of national interests or vice versa. There is a delicate balancing act to ensure that local users and communities have a say in management, without compromising the need to ensure that national priorities are also being addressed. Done right, this Rule could ultimately help build trust between stakeholders and the Forest Service. All sides (Forest Service and stakeholders) will need to assume responsibility for successful implementation of the Rule - stakeholders will need to actively reach out to the Forest Service and engage in the process, as well as vice versa.
- Given that there are many types of collaboration, it will be important to define collaboration and clarify the decision-space in which collaborative groups operate. The planning Rule (and/or directives) could include a glossary / appendix with examples of the types of collaboration that could be undertaken. (It may be helpful to reference the CEQ collaboration spectrum). It was also suggested that collaboration should be designed based on the outcome-goals, and not be overly prescribed in the Rule.
- It should be clear in the Rule that collaboration occurs in stages. In addition to the actual engagement process, there needs to be strong public outreach, education about the process, and follow-up with stakeholders and communities. It is important that this process is actual engagement, and many suggested that a community liaison could be valuable in the planning process.
- Regarding outreach, there was some discussion of the need to target underserved, non-traditional and youth communities. Some suggested that the term “underserved” had a negative connotation and suggested finding more appropriate terminology. Many also suggested producing materials in multiple languages, and that these languages should be described as “languages appropriate to the local communities” and not “foreign languages.” Some were worried that further efforts to reach out to and engage particular communities may inadvertently close doors on others; and that as the collaboration process become important, groups or individuals who for whatever reason (money, proximity, not knowing about the process), might be further disenfranchised by not engaging. Addressing that concern will be an ongoing challenge.
- There were a number of suggestions about noticing opportunities for collaboration. For example, the Rule should require publication of notices in reliable, consistent media, not just local newspapers. Hold all “public notice” obligations to a required standard of reliable outlets such as regulations.gov, the federal register and local web pages at a minimum, and supplement this with other traditional information outlets that are used by under-served communities and persons who are not able to use the internet. The

Forest Service could establish a national outlet, and if it does so, ensure that it is managed well.

- The education part of collaboration will help the Forest Service develop engaged and interested stakeholders. Education should happen across communities and include users, local groups, stakeholder and youth. Some suggested that the Forest Service should work with youth across the country to increase their environmental knowledge. Education processes developed by the Forest Service needs to be “culturally sensitive and appropriate.”
- Tribes have an elevated status that requires formal government to government consultation. This Federal to Tribal consultation is distinct from and additional to collaborative activities. This should be noted in the Rule and throughout the planning process.
- The importance of collaboration with local and county governments was also stressed because local communities are essential partners and locally elected officials play a particularly important role. Some thought that processes for engaging local officials should be recognized and formalized in the Rule.
- Some people expressed concern about how science will be incorporated into the collaborative process. They wanted to ensure that the role of science is made explicit, that there is a clearly defined space for collaboration, up to and including the relationship between science and collaboration, and the relationship between collaboration and the decision making process. An underlying concern seemed to be that science and or decision making might be subject to popular voting, which would not be desirable.

---

## Role of the Regional Office

The role of the Regional Office could change some with the wide-spread use of collaborative processes. The emphasis on collaboration would provide more input and an increased level of public oversight for forest plans. Some liked the fact that this process seems to alleviate some of the burden on the Regional Offices to be decision makers, and appreciated the increased public oversight this could provide.

---

## Appeals and Objections Process

Many, but not all, liked the idea of the reliance on an objection process. They thought it has worked well at the project level and could work well at the plan level (although it was noted by others that the experience to date with objections is very limited). Hope was expressed that the emphasis on collaboration will allow more people to be involved and to voice their concerns earlier – and will lead to a willingness to use an objections process, ultimately resulting in fewer lawsuits. Some suggested that since there is currently a 45-day window for

appeals, there should be a 45-day window for objections. Those expressing skepticism thought there should also be an appeals process.

---

## Requirements and Flexibility

As noted above, there were a variety of perspectives on how many requirements and/or how much flexibility should be built into the Rule. Some participants favor limiting the Rule to the statutory requirements. Some suggested that the Rule reference the statutes and add a minimal level of guidance for managing particular resources. Others suggested that the Rule require the development of standards for most resources at the plan level, and that for certain key resources, such as threatened and endangered species and water, the Rule should have more explicit national guidance. And, some suggested that all guidance that could possibly apply to all forests be included in the Rule language (rather than being relegated to directives). Many acknowledged the challenge of striking the right balance.

---

## Monitoring

Many participants expressed appreciation for the emphasis on monitoring. Specific suggestions for further strengthening this part of the Rule were:

- In the Rule give more explicit attention to “adaptive management”, and be more clear about how monitoring results are evaluated and tied to changes in management.
  - Fix the monitoring definition to state “data-collecting and evaluating;” i.e., don’t restrict monitoring to just data collecting, or the Agency is likely to continue to get data that is not used to inform management decisions.
- 

## Resilience and Restoration

Participants in those groups that further discussed resilience and restoration made the following comments:

- The Rule should direct Forest plans to define restoration, resilience and the relationship between the two in relation to the specific forest unit (in addition to there being definitions in the Rule itself).
- If the definition of restoration means not returning to a historical point, it might also imply that there was no need to look back at all, when in fact historical conditions can be important benchmarks.
- Resilience should not include the ability to “absorb disturbances while undergoing change.” They said that resilience should be generally applicable to all ecosystems.

Ecosystem resistance, resilience, and transition are all important concepts related to climate change. It is clear that climate change will force us to consider the transition of ecosystems and species within ecosystems (i.e., climate change may wipe out the species that contribute to desired conditions in specific locations). Thus, the planning rule needs to be flexible such that the Forest Service can not only focus on resilience but on resistance and transition as well. In some cases, the focus needs to be on what is the next best means we have to achieve resilience.

- Resilience is not always desirable. For example, an invasive species may be highly resilient but may not be desirable in the ecosystem. This is an example where historical baselines, therefore could be important in determining desired conditions.
- 

## Climate Change

There was acknowledgement that the science of climate change is evolving so fast that the Rule should not be too prescriptive in what it requires; i.e., there has to be enough flexibility to accommodate new information and approaches to climate adaptation and mitigation over time. Nevertheless, some specific suggestions were:

- Climate change should be explicitly addressed in the assessment portion of the Rule, potentially in the vulnerability assessments the Forest Service is already doing. It was noted that climate change is already addressed in the Forest Service roadmap.
  - The relationship between climate change and resilience should be addressed.
  - Both adaptation and mitigation should be included in the Rule. For example, carbon sequestration could be listed as an ecosystem service in the Rule.
- 

## Fire

Specific suggestions regarding fire were:

- Fire as an ecological process should be explicitly addressed in the Rule. For example, some suggested that the Rule should give guidance for coordinating forest plans with fire management plans. Fire management plans are often done without public input and do not use a NEPA process; if they were coordinated with forest plans there could be better public engagement and oversight in relation to these plans.
- The cultural significance of fire to Tribes should be acknowledged in the Rule.

## Plant and Animal Diversity

Many noted that the “coarse-filter” approach outlined in the rule seems to work well, but many questions remain about the “fine-filter” component. For example, some questioned how viability at the “fine-filter” level would be addressed. They wondered how the focal set of species would be used, particularly if there is no viability assessment.

---

## Dynamism and Connectivity of Ecosystems

Many noted that it is important to understand ecosystems as both connected to other ecosystems and very dynamic. They suggested that the Rule should explicitly state this. An understanding of these aspects of ecosystems, some said, would be valuable in making many types of management decisions.

---

## Water and Watersheds

Many wanted to see water / watersheds given an elevated level of importance in the Rule given that so much drinking water, particularly in the West, flows from/through National Forests. For example, some suggested explicit guidance about elevating the importance of water quality / watershed protection as a management priority relative to other resources. It was also suggested that the Rule could direct each forest to develop a water conservation strategy. Some thought directives were the appropriate vehicle for how best to address water issues.

---

## People and the Environment

Many participants wanted more clarity in the definitions and terms used in this section. There is a need to incorporate both financial and non-financial values in plans for uses and contribution to local, regional, and national economies.

Much of the discussion about this section focused on recreation. Some believe that recreation should be a premier multiple use, and were unhappy with the way it was represented in the proposed Rule draft. They said that if recreation is not a focus, the Forest Service will lose connections with the people who use the land. Many said that they would like to see the Rule include language that more explicitly requires planners to address recreation and multiple use. Some thought that multiple use should be the basis of planning. Others would like to see access to public lands, by land, water and air, specifically addressed in the Rule.

## Suitability

Some expressed concern about the lack of guidance in the Rule for how to comply with the NFMA requirements around timber suitability. One specific worry was that leaving such guidance to directives could open up the Rule to legal challenge. It was suggested that there should be a consistent approach to suitability determination across the country, and that the roundtables provide an opportunity for engaging stakeholders in the development of language. Others said that if all of the timber suitability requirements were included in the Rule, it would be overly long and complex. Some suggested that the Rule should include some language and that additional specifics should be included in the directives. Some suggested that other uses should also be subject to suitability considerations. Grazing and recreation were called out specifically, and it was noted that just because land can be used for a specific purpose does not mean it should be.

Some also noted that sideboards are needed to ensure that timber harvest as a tool for restoration and resilience are used in appropriate places for appropriate reasons.

---

## Roads and Travel Management

Some called for roads and travel management to be more explicitly addressed in the Rule. They noted that a lot of work has gone into developing travel management plans and that it would be good if the planning Rule could give guidance for how they should interact with forest plans. Many noted that this issue would probably be addressed in the desired conditions section of a plan; although they noted that in order for this to be the case, forest plans would need to address geographic components and be clear about what types of uses are suitable and/or desirable in a given location.

It was also suggested that there should be some consistency across forests for issues that affect human use and access. Some suggested that specific standards or goals that address access and use questions could be developed that apply to all plans.