

APPENDIX 2
Co-Chair's Summaryⁱ
Background Context – Interests and Rationales Underpinning Final Recommended
Changes To The Draft Planning Rule Directives

1. Adaptive Management: Continuous adaptive management cycles (assessment, planning, implementation, monitoring) in a collaborative, transparent, and accountable (including on the part of line officers) process are essential to effective implementation of the rule. Active collaboration among the Forest Service, the public and external partners, including States, local governments, and Tribes, in the development and implementation of the plan monitoring program, as included in Section 32 will further enhance the efficiency and efficacy of implementation.

Rationale: The mission of the Forest Service cannot occur in a cost-effective manner without learning from past management to inform future management; and the only way this informed decision-making will occur is if we monitor our actions. Monitoring and adaptive management are integral to management of national forests, and should be viewed as essential to implementing the agency's multiple use mandate.

2. NEPA Integration in the Forest Planning Process: Guidance is needed to ensure (1) that the public receives adequate notice of the opportunity to participate in the pre-NEPA assessment and (2) that the NEPA process is integrated at the earliest possible time during the plan revision process based on the assessment (40 CFR 1501.2).

Rationale: The NFMA requires forest planning to comply with NEPA, and the 2012 planning rule requires preparation of an EIS whenever a forest plan is revised (36 CFR 219.5(a)(2)(i)). Yet, neither the planning rule nor the draft directives explain how and when to integrate the NEPA/EIS process with the forest planning process.

3. Social, Economic And Cultural Analysis: To achieve the necessary parity between the USFS historical expertise in ecological assessment, planning and managing, greater clarity must be provided to ensure that the Forest Service will assess, plan for, monitor and adaptively manage social, economic and cultural questions that are important to those who rely on the forest and use the plan area and will put these priorities on par with ecological assessment, plan components, monitoring and adaptive management efforts. Harnessing new sources of information, conceptual and analytical tools and multiple social media avenues will be critical not only to understanding the needs of interested parties and their land management specific interests, but it will also shed light on whether and to what degree the resource has relevance to

local, regional, or even international communities. The recreation sector is exemplar in this manner.

Rationale: Community health and forest health are inextricably connected. The draft directives give significant attention to ecological integrity. The final directives must embody a more effective balance of ecological, social, economic and cultural considerations and must support social, economic, cultural and ecological sustainability. The directives must convey that this is as important as all other planning objectives. The goal is complementary ecological, social, economic and cultural plan components.

4. Diversity Outreach: Encourage and ensure a greater awareness and involvement of local communities and under-represented communities (youth, low-income, and racial/ethnic minority) in national forest planning and management.

Rationale: Engaging youth, low-income, and minority populations in the forest planning process is a very important and challenging aspect of public participation because the tools and target audience are not the usual actors/toolkits. Forest Service personnel need more guidance on ways to break down cultural and communication barriers and create a more welcoming atmosphere for public engagement.

5. Wilderness: Chapter 70 (Wilderness) received careful scrutiny which resulted in a number of clarifications and assurances with respect to participation, scope and consistency with the Wilderness Act and other applicable laws, including those guiding Tribal Consultation. Clarifications include the use of existing information/starting point; whether, when and how state and local governments, tribes and Alaska Native Corporations, and the general public can participate in the Wilderness evaluation process. They seek to ensure the wilderness inventory guidance and criteria is consistent with the Wilderness Act and the Planning; Congress' authority and ability to designate wilderness while protecting the characteristics that make them eligible for inclusion in the NWPS

Rationale: In the past, the Forest Service has inventoried and evaluated areas that may be suitable for wilderness designation without adequate intergovernmental and public participation or sufficient transparency. The 2012 planning rule requires such participation "early and throughout the planning process" (36 CFR 219.4(a)(1)). Additional clarifications ensure consistency with the Wilderness Act.

6. Desired Conditions and Natural Range of Variation (NRV): Both terms were defined to improve clarity. Ensure forests understand that managing for NRV is not required by the planning rule, and that forests can manage for desired conditions outside the NRV

Rationale: These important terms must be defined and parameters clarified to avoid confusion in implementation.

7. Climate Change: Ensure that the Forest Service can efficiently and effectively address climate change and associated uncertainty within the planning process.

Rationale: The draft directives are inadequate in integrating existing Forest Service climate change tools into the planning process in a comprehensive manner.

8. Governance and Transparency in SCC Determinations: The directives are ambiguous as to when how, and under what process, *identified* SCCs become *determined* SCCs. Efficiency and efficacy would be greatly enhanced by clarifying the timing, stressing the regional forester SCC determination be made early, clarifying the role of responsible officials and regional foresters in SCC identification and determination; directing the regional forester to provide public access to the list of determined SCCs, (4) encouraging that the expertise of local, state and Tribal agency expertise is utilized in identifying SCC.

Rationale: Regional forester SCC determinations should occur early enough in the assessment phase to ensure integration of SCC's into the planning process and to increase planning efficiencies. Similarly, the directives could be clearer on the roles of the regional forester and responsible official in the SCC identification and determination processes. Allowing the public to review the SCC list is consistent with transparent practices and could provide useful inputs. Leveraging local, state and Tribal natural resource agency expertise will increase the effectiveness and efficiency of the process. Finally, the directives are silent on how new SCCs will be incorporated into existing forest plans.

9. Objections: Authentic participation is valued deeply by the committee. Protecting such interests gave rise to the desire to ensure that eligibility requirements for interested parties are anchored in substantive participation in the planning process. Additionally, the reviewing officer has discretion to structure participation to ensure integrity of objections process through consistency of participation in planning process.

Rationale: Necessary to ensure authentic participation and protect against "gaming" the objections process, as well as to assuage fear that objections process will become unconstructive public hearing, rather than constructive resolution of specific objections.

10. Overarching Items

Readability of directives: Committee recommends moving the current Chapter 40 to follow immediately after the Zero Code; and where practicable, to use lifecycle type examples to illustrate some of the key concepts (e.g. adaptive management, etc.)

Spirit of the planning rule: Place the highest-level objectives from the Planning Rule into the directives.

Plan Consistency in Suitability Determinations and Consistency of Forest Plans, Travel Management Plans and Other Planning Processes: Forest plans are one of several planning documents that guide forest management. The forest plan can be a unifying mechanism and the forest planning process a means of unifying goals, objectives, management strategies, programs and projects.

Water: Provide clear direction to Forest Service personnel to consider water resource contributions to community and ecosystem needs and services within the area of influence in collaboration and consultation with tribal, state, local governments, [other water managers] and the public during Forest and Grassland Planning.

Rationale: The National Forest System is an essential source of water for domestic, ecosystem and other purposes.

Intergovernmental cooperation: Provide responsible officials with a better understanding of the different processes to increase intergovernmental cooperation and coordination where appropriate, while clarifying roles and responsibilities to manage expectations and clearly elaborate roles and responsibilities during the planning process.

Rationale: Accessing the special expertise possessed by the other governments also assists to stretch limited government resources to increase effectiveness, efficiency and transparency in forest and grassland planning. The various consultation, coordination, and cooperation policies are distinct, yet inter-related.

11. Definitions: A number of definitions have been refined and/or added to the Zero Code including broader landscapes, roles and contributions, adaptation (to refer to specific adaptations related to climate change); coordination and adaptive management.

ⁱ Note this does NOT represent committee consensus, but is instead a summary of the work group recommendation templates that served as the basis for generating subsequent consensus of the committee as a whole