USDA Forest Service
U.S. DEPARTMENT OF AGRICULTURE

Condition Based Management

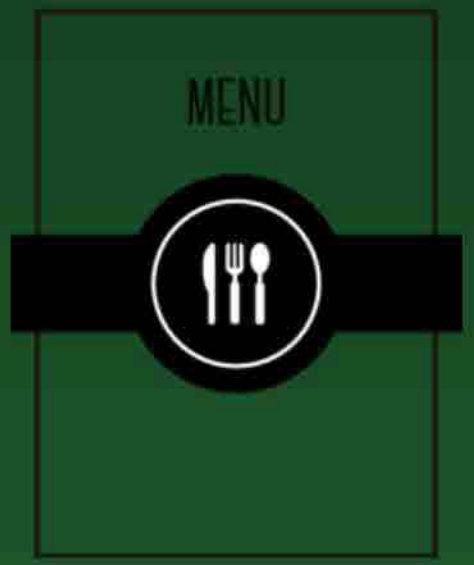
NEPA Café

January 20, 2022

Menu:

- Introduction to CBM
- FAQ walkthrough
- Lessons learned from Tennessee Creek project
- USDA OGC counsel
- Questions and answers

- Format



Servers:

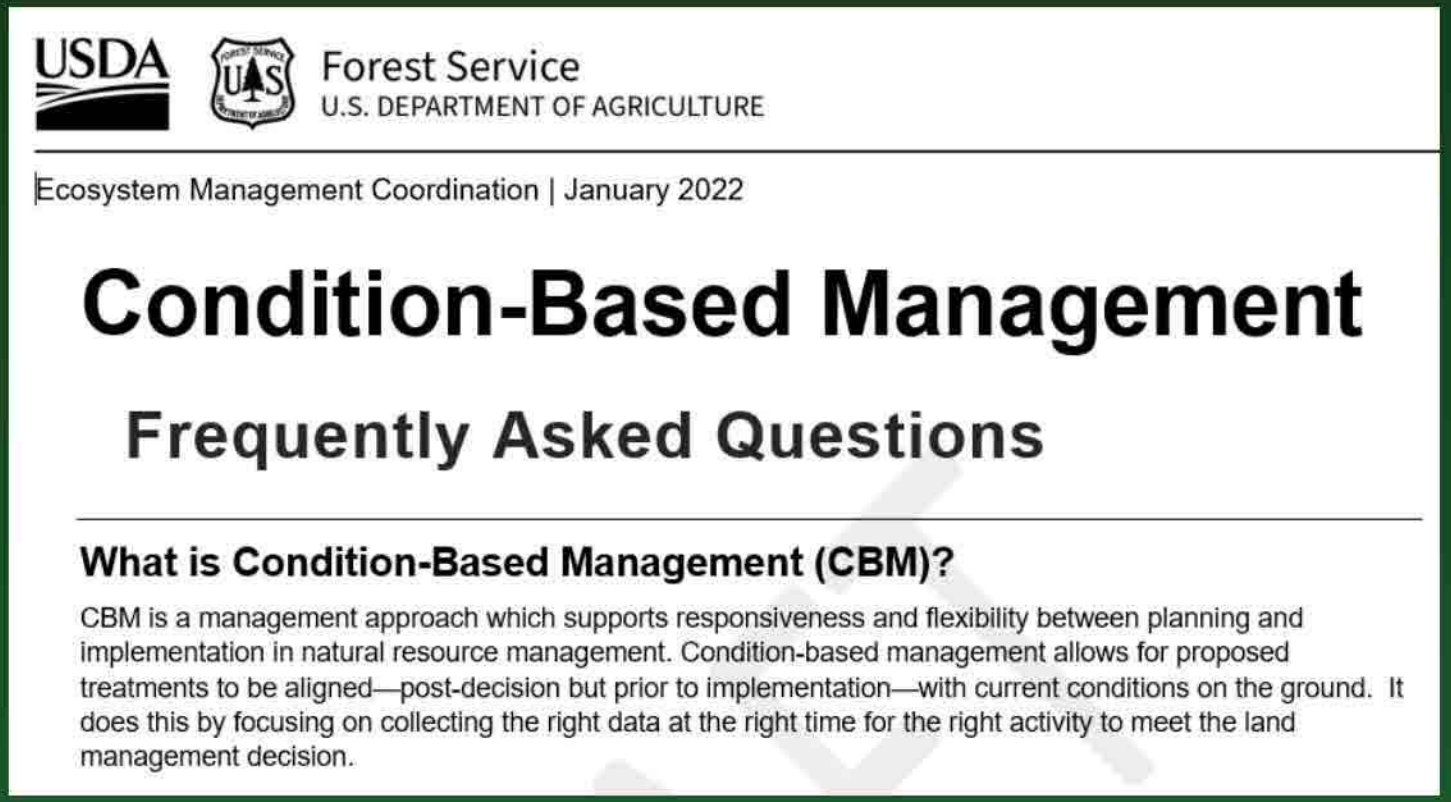
- FAQ walkthrough
  - Steve Stadelman, NEPA Specialist, EMC
- Tennessee Creek project
  - Lisa Corbin, Timber Program Lead, Pike & San Isabel NF
  - Jeni Windorski, Wildlife Biologist, Pike & San Isabel NF
- USDA OGC
  - Vince DeWitte, Senior Counsel, NRE
- Questions and answers
  - Annette Fredette, Forest Planner, Coconino NF
  - Tasha Hernandez, Regional Environmental Coordinator, R9
  - Wendy Jo Haskins, Director of Ecosystem Analysis, Planning and Physical Resources, R3
  - Tera Little, Deputy Branch Chief, NEPA Services Group, EMC

Overview of CBM

- History
- Trainings
- 2019 Draft NEPA Rule, CBM
- CBM Workgroup
- FAQ

Condition Based Management FAQ

- Initiated last year, group effort, 8 questions
- Living document, will be updated at regular intervals



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Ecosystem Management Coordination | January 2022

Condition-Based Management

Frequently Asked Questions

What is Condition-Based Management (CBM)?

CBM is a management approach which supports responsiveness and flexibility between planning and implementation in natural resource management. Condition-based management allows for proposed treatments to be aligned—post-decision but prior to implementation—with current conditions on the ground. It does this by focusing on collecting the right data at the right time for the right activity to meet the land management decision.

What is CBM?

- A management approach which supports responsiveness and flexibility between planning and implementation in natural resource management
- Condition-based management allows for proposed treatments to be aligned—post-decision but prior to implementation—with current conditions on the ground
- Condition-based management is a method to meet NEPA's requirements, not to avoid or shortcut them
- The increased flexibility CBM offers requires additional work in developing the proposed action and engaging the public but helps to implement the right treatment in the right place

A few more details…

- To support informed decision-making and demonstrate sufficient analysis, the environmental analysis must examine current conditions as well as the anticipated effects from the suite of management activities being proposed in the project area
- The analysis must disclose the selection criteria being used to determine the specific treatments to apply, as well as analyze the potential environmental effects of the management activities expected to be implemented when a defined set of site conditions is present
- Condition-based management analysis should disclose the process by which location-specific conditions will be validated prior to implementation

And even a few more

- Condition-based management adds the step of validation prior to implementation
- Validation entails assessing/confirming the current site conditions, selecting the appropriate management activities based on the analyzed criteria, and confirming the potential effects from those activities are accounted for in the environmental analysis decision
- There is flexibility to account for a variety of site conditions and a range of management activities if they are analyzed and their effects disclosed, within the NEPA document

Why use CBM?

- Condition-based management allows managers to make landscape-level decisions while reserving flexibility to respond to on-the-ground conditions and confirm the right treatment is prescribed and conducted at the right time
- CBM is also about analytical efficiency independent of changed conditions between the decision and implementation
- In some instances, there may be enough known information and analysis to fulfill the twin aims of NEPA without collecting and analyzing all the fine-scale information up front

Where and When to use CBM

- When site conditions are dynamic and unpredictable due to known environmental stressors, such as insect and disease outbreaks and invasive plant encroachments
- When there may be considerable time between the decision and actual implementation of management activities on the ground, such as in a larger, landscape-scale project
- Where existing or current data over a large project area may require additional surveys before implementation to confirm precise current conditions at the time of implementation
- Condition-based management may not be needed when site conditions are predictable and site-specific information and field data are robust and comprehensive for fine-grained analysis

How is CBM related to Adaptive Management?

- AM and CBM both account for environmental analysis with responsiveness and flexibility
- With AM, adjustments to management activities occur after their initial implementation and are based on monitoring results
- With CBM, appropriate management activities are determined prior to initial implementation based on field reviews which validate the current location-specific resource conditions
- Both approaches must meet the requirements of NEPA, and document the reasoning for using them

Is CBM Programmatic NEPA?

- Most often, programmatic NEPA analysis refers to broad or high-level NEPA reviews that address the general environmental issues relating to broad policy or strategic decisions
- Programmatic NEPA reviews generally do not authorize on-the-ground activities or implementation of projects
- CBM is used in project-level NEPA analyses, often for larger projects implemented over a longer time period
- The CBM project NEPA analysis and decision will analyze and authorize on-the-ground management activities

What sort of public involvement is recommended in CBM?

- Condition-based management may entail additional public interaction during both the NEPA process and implementation of the selected management activities
- Because of the increased flexibility built into CBM, there should be an emphasis on transparency and accountability with Tribes, stakeholders, and the public
- Public involvement under NEPA cannot be deferred to implementation with CBM

Final Thoughts

Good CBM starts with good NEPA!

- Focused purpose and need, proposed action
- Critical thinking, rationale
- Disclosure of effects of all potential actions
- Appropriate scoping and public interaction
- Close coordination between RO and IDT

Tennessee Creek Case Study/Lessons Learned

- Lisa Corbin, Timber Program Lead, Pike & San Isabel NF
- Jeni Windorski, Wildlife Biologist, Pike & San Isabel NF

Tennessee Creek Project
Project Information

- Project area: 16,450 acres. ~10,000 acres were planned for thinning and clear cuts.
- Treatments are planned mainly in mature lodgepole pine and aspen.
- Canada lynx habitat exists throughout the project area.
- The term "Condition Based Management" did not exist at the time of project development.
- We had work with EAs where the treatment listed for a specific unit did not fit the conditions on the ground.
- The ID Team made the decision that we wanted to find a different way to develop the EA – something that was more flexible.

Tennessee Creek Project
Wildlife

How effects to lynx were analyzed?

Because we weren't pre-determining treatment units, we needed to analyze for the "worst case scenario", which meant assuming all 9,480 acres of lynx habitat would be treated.

We knew, because of our design criteria and other limiting factors, that we would not treat that much.

Still, we could not quantify a specific acreage that would be treated since we were doing some of the design criteria work closer to implementation of a unit.

Our lynx habitat map is a model – and sometimes gets it wrong (in either direction). We wanted to be able to determine on the ground during implementation if it was actually lynx habitat or not.

Tennessee Creek Project
General Lessons Learned

- What we did right:
  - Strong proposed action with side boards (i.e., no more than 25% of lodgepole would be clearcut, clearcuts are limited to 40 acres or less, areas with dense horizonal cover greater that 35% would be left as reserves, etc.)
  - Within the EA, we specified that dense horizontal cover would be measured utilizing cover boards prior to implementation. It was not practical to complete coverboards on ~16,000 acres prior to signing the decision.
  - Analyzed "worst case scenario" associate with Canada lynx and assumed all treatments would occur in lynx habitat.
  - Good mapping – both for the EA and the analysis (especially for the lynx habitat mapping). **

Tennessee Creek Project
General Lessons Learned

- What we could do better:
  - Be realistic on the proposed action and project area. We don't want to analyze for treatments we will never do.
  - Connect the dots in your analysis.
  - Include response to comments when the draft decision goes out to the public. It shows the public how their comments were addressed.
  - Good mapping – both for the EA and the analysis (especially for the lynx habitat mapping). **

** We had good maps, but we learned there can always be better maps.

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Questions and Answers

- Annette Fredette, Forest Planner, Coconino NF
- Tasha Hernandez, Regional Environmental Coordinator, R9
- Wendy Jo Haskins, Director of Ecosystem Analysis, Planning and Physical Resources, R3
- Tera Little, Deputy Branch Chief, NEPA Services Group, EMC

Moving Forward

- Thank you for your questions!

- Frequently Asked Questions
- CBM Workgroup – looking for new members
- EMC SharePoint Site on CBM