

Region One

Missoula Planning Rule Roundtable Report

April 13, 2010

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I. Executive Summary

The Forest Service is revising the Planning Rule, the rule under which individual National Forest plans are developed. The rule will be revised through a collaborative process, part of which has been to conduct roundtable meetings in each Region.

In Region One of the Forest Service, headquartered in Missoula, Montana, three roundtables meetings were held simultaneously on April 13, 2010. Approximately 200 people participated in the Region One roundtables in person.

Participants selected discussion topics from four topic categories including;

- General: What makes for a great planning rule?
- Plan Content: What information should a plan contain?
- Substantive: How should forest plans deal with restoration, climate change, watershed health, plant and animal diversity, ecosystem services, contributions to local economies, and uses of National Forest and grasslands?
- Process: How should plans be developed?

Roundtable meeting attendees supported transparency and collaboration in developing the new rule and subsequent Forest Plans. There was a general belief that the current process is too complex, time consuming, and expensive. Participants encouraged the Forest Service to involve all potentially interested parties--adjacent landowners, forest users, local government, state and federal agencies--early and throughout the process, using a variety of media to communication information, and making it convenient to participate.

Attendees acknowledged that forest planning is taking place with many uncertainties. They generally supported flexibility and adaptability in planning as long as course corrections were based on monitoring results and sound science. Ecosystem resilience, forest and watershed health were recurring themes with restoration supported when specific goals and outcomes could be identified.

Finally, participants at each meeting asked that the Forest Service recognize and consider appropriately local communities' interests and ties to the public land and the impacts that National Forest decision-making has on their communities.

This report was prepared by the facilitation team independently of the Forest Service. Interested individuals are encouraged to read the meeting documentation in Section V.

II. Introduction

On April 13, 2010, three all-day roundtable meetings were held simultaneously in Region One. The three venues, Missoula, Montana, Billings, Montana, and Coeur d'Alene, Idaho were linked through the Forest Service's video technology system. Opening remarks were made by the Chief of the Forest Service via video and in person by the Regional Forester, Leslie Weldon. Regional Forester, Weldon, spent the entire day at the roundtable in Missoula. Local line officers were present at the Billings and Coeur d'Alene roundtables.

The public roundtables were noticed in the Federal Register, through local newspaper articles, posted on the regional and national websites, through letters of notification, and through personal contacts with tribal officials. Letters of notification were mailed to approximately 400 stakeholders identified by the Forests one month prior to the roundtables. Participants were asked to pre-register for the meetings to help with logistics, but pre-registration was not required.

There were 131 participants at the roundtable in Missoula, 35 at the roundtable in Billings, and 30 at the roundtable in Coeur d'Alene. Non-Forest Service facilitators and recorders, and some Forest Service employees are not counted in these numbers. A wide variety of interests were represented across the regional roundtables including; recreation, timber, environmental, education and research, oil and gas, grazing, other state and federal agencies, local, state and national elected officials and/or their staff, Forest Service retirees, and current Forest Service employees (planners, specialists, leadership.)

The roundtable agenda was organized to provide two discussion sessions, one in the morning and one in the afternoon. Participants selected the two topics of most importance to them and participated in table discussions on these topics. The topics were categorized under the following headings; General, Plan Content, Substantive, and Process. The discussion topics under each of these headings were based on the principles published in the Federal Register Notice of Intent in December 2009.

The roundtables were facilitated by the Beck Consulting team of four facilitators retained by the U.S. Institute for Environmental Conflict Resolution. Flip chart recorders were provided for each of the small group discussion tables. Recorders captured all key points made regardless of whether there was agreement. The recorders consisted of a combination of independent contracted recorders, University of Montana students from the College of Natural Resources, and Forest Service employees.

III. Background

The Forest Service is undertaking a collaborative process to revise its planning rule. The planning rule provides the guidance for preparing individual Forest Plans. The collaborative process has several components. These components include; a national science forum, three national roundtables, a national tribal meeting, a federal inter-agency group, an internal working group, roundtable meetings in each of the Regions, and new media to make access to all of the planning information readily available and transparent.

The regional roundtables will be completed by the end of May 2010. The Forest Service timeline calls for Chief approval of the proposed rule in August, Chief approval of the final rule in June 2011 and publication of the final rule and Record of Decision in the Federal Register in November 2011.

The goals and objectives of the planning rule process are:

- Open and participatory process
- Address Notice of Intent principles
- Develop a durable planning rule
- Develop a practical and efficient rule
- Incorporate an all-lands approach to address relationships of NFS lands to surrounding landscapes
- Develop a process that uses contemporary planning methods to incorporate the latest science into land management plans



Missoula Roundtable

IV. Themes

While there was inadequate time to achieve consensus, a number of themes emerged from the roundtable discussions. Many of these themes transcended individual discussion questions and crossed more than one of the principles. The themes below are those ideas that were either expressed frequently, appeared to enjoy wide-spread support, and/or arose during discussions from several different topics. Once again, readers should not assume consensus was achieved on the following themes and divergent viewpoints did exist. They are listed below with no priority order.

I. <u>General</u>

- Current process not working well, too complicated, too lengthy, too expensive
- New rule needs to simplify the process and shorten the time it takes to prepare a plan
- The new rule needs to be brief, simple enough to understand and explain
- New rule needs to focus on the long-term
- The new rule needs to incorporate best available science

II. <u>Plan Content</u>

- New planning rule should require standards and guides
- One scale does not fit all, scale needs to be matched to what is being analyzed
- Plans must be fiscally realistic
- Plans should be based on a national template for overall consistency, but allow considerable flexibility to address specific local situations/conditions
- Plans should consider activities and impacts on adjacent lands
- Plans should recognize the importance of all resources
- Plans should recognize economic implications and trade-offs for local communities
- Plans should understand and take into consideration changing demographics, local custom and culture, the social situation, and how FS actions affect the social situation
- Definitions need to be updated. New terms should be defined and incorporated as appropriate. Out-dated terms should be done away with.

III. <u>Substantive</u>

- Manage for ecosystem resilience and forest health
- Restoration must have clearly defined goals and outcomes
- Carefully define desired condition, "historic condition" should not necessarily be the goal especially given changes in climate
- Watershed health and water resources are very important, road condition/maintenance are big factors in watershed health
- Strive to maintain natural processes
- Mimic natural processes

- Promote environmental stewardship regardless of climate change
- Climate change is uncertain, but the FS must still manage in the face of uncertainty
- Role of science is key
- Recreation should be given higher significance, it's more than an impact
- Short-term benefits to rural economies should not compromise ecological values
- Timber and non-timber forest products both need to be addressed
- Access to National Forest lands is an expectation of the public—in many cases this is not currently being met.
- Forest plans should include a monitoring plan and monitoring should be funded and implemented.

IV. <u>Process</u>

- Stakeholders, including adjacent land owners, other state and federal agencies, and elected officials--especially at the local level--need to be involved early in the process and throughout the process
- Local knowledge is important and should be recognized and utilized
- Electronic tools should be utilized to provide information, make information more easily accessible, and communicate with stakeholders
- Emphasis should be placed on processes to resolve conflicts before they reach litigation
- Local/regional Resource Advisory Councils or RACs can make positive contributions
- The Rule needs to provide a process to make plan amendments simpler and more straight-forward
- Amendments need to be used frequently to adapt to changing conditions
- Build in ability to do adaptive management, but adaptive management must be bases on monitoring results and best available science
- Local communities have a strong sense of ownership. The FS is their backyard.

V. Meeting Documentation

1. GENERAL FEEDBACK

What would a GREAT planning rule look like? (R1 Question 1)

- Short (Rule should be 2 pages, Plans should be 30-50 pages),
- Simple, can be explained, but not too simple
- Not vague
- Ample opportunity for collaboration and public involvement
- Collaboration that balances participation, social issues, and science
- Need to clarify the rules regarding big collaborative process.
- Better public notice process
- Broadly supported
- Strategic goals, Identifies goals and constraints.
- Plans should be strategic and operational.
- Well-organized
- Easy to read
- Adaptable, flexible
- Amendable, easy to change
- More emphasis on a good revision/amendment process
- Provides simplified/expedited amendment process
- Easier process for change at the regional level.
- Has a specific shelf-life with a framework for revisions and adaptations
- Include a standard and workable method for adapting and amending the forest plans.
- Changes to plans would happen through a NEPA process and involve the public. Public participation at all NEPA stages is key.
- Rule has to be clear about definitions and how things will be measured
- Uses terminology that is not ambiguous
- Well-defined expectations and outcomes
- National uniformity
- Adds weight to local input based on expertise
- Adaptable, flexible
- Fiscally realistic, fully funded
- Transparent,
- Good outreach
- Plans done within a reasonable timeframe (6 months, 1-3 years)
- Plans good for 10 years
- Six-month process
- Durable, won't change when administration changes
- Buffers presidential decisions
- Puts ecosystem integrity before consumptive uses
- Specific and reality based

- Internal appeals process ending with agency, not courts
- Lawyer proof Legal intervention should be allowed to ensure that the best science is used in the EIS.
- Strong mediation process and opportunities
- Directs the plan to be enforceable
- Recognizes that community benefits may not be the same as national benefits
- Cheap to implement
- More integrated approach
- Transcends political boundaries
- Uses a volunteer/partnership approach to monitoring
- Makes leadership accountable, rewards good leadership
- Monitoring requirements are incorporated and clearly delineated
- Returns to intent of NFMA and re-aligns with language in the act
- Contains both standards and guidelines in Rule
- Require an EIS process to develop a plan (causes you to examine alternatives you may never select—time issue)
- Limits the number of alternatives in the EIS
- More linear (NEPA) process, with clear ending and starting points
- NEPA documents should be shorter and be more useful tools; emphasize the critical and important information.
- Science needs to be part of process, helps make trade-offs clear
- Incorporates recommendations from the national science committee.
- Eliminate/don't eliminate ORV use on National Forests
- Balances local, regional, and national concerns
- Responsible and responsive revising
- Include water quantity/quality to help guide forest planning process
- Short, concise, cheap, fast, effective, to the point
- Should focus on the long-term (this needs definition)
- Define the future condition of the forest.
- Use an "ink-conservative" font.
- Plans should be flexible and adaptable, based on monitoring
- Good public involvement, with transparency. Involve the public sooner.
- Plans should have a public information component that explains the complexities of forest planning and how it all fits together.
- Ensures ecological integrity over consumptive uses.
- Few pre-conceived ideas
- Understandable by everyone from the regional foresters to the trail crews.
- Covers all aspects of forest management equally
- Includes the social sciences
- Fosters conservation of wildlands, restoration of fish and wildlife, restoration of watersheds, emphasizes traditional and low impact recreational uses.
- Considers economic impacts to local communities, today and into the future.
- Recognizes the value of non-commercial forest products.
- Recognizes public lands for public use and public good.

- Gives forest supervisors and other employees credit for their education, knowledge and experience
- Includes local officials
- Recognizes the value of RAC's
- Adaptability within the rule would reduce litigation, e.g. beetle infestations were not anticipated when the current plans were developed.
- Plans should last longer than 15 years, but should include the ability to change in response to changing conditions.
- Consistent procedures so there are similarities across units.
- Include a process for constant updates and changes. The process should be within the NFMA framework to avoid abuse.
- Updates should be on an established timeline and it should be followed.
- Changes also should be made in response to catastrophic conditions. Clarify the distinction between large fires as natural or catastrophic events and which require changes to the plan.
- Protect wildlife, recreation and water resources.
- The plan should be readable and understandable by the general public. Definitions make sense. Create consistent language and definitions across forests, watersheds, etc.
- Define collaboration in terms of the planning rule and forest plans.
- It is good to start with individual forums.
- A multi-disciplinary approach that involves the public, addresses all of the relevant laws and distinguishes between the mandatory and discretionary requirements of forest plans.
- Evaluates and identifies the appropriate level for management. Begins from a landscape scale and works down.
- Satisfies need for consultation
- Adequately addresses cumulative effects
- Integrates the forest plan and the travel plan
- Timely and done right the first time.
- Respect for customs and cultures of local communities so that they are considered and rural lifestyles are preserved.
- The planning rule should not allow a "stump" to delay projects that have followed all of the processes, rules and policies.
- A planning rule that recognizes and values recreation at least as much as logging and traditional activities.
- Plans should be short, 30 to 50 pages.
- Make summaries available.
- The reading level should be like magazines; useful as a business document.
- Data and information should be available electronically.
- Plans need a way to incorporate changes.
- No acronyms or, at least, acronyms that are clear.
- The science of resource management, not the planning process, should be the driver.
- Develop desired conditions at multiple levels with great community involvement.
- Desired conditions have flexibility.

- Plans establish sideboards within which project decisions are made.
- The rule should be something under which the FS can function.
- The rule should emphasize monitoring and hold FS accountable for monitoring.
- Changes in the plan should be based on the best available science and developed through monitoring. Monitoring should lead to rapid change, without having to redo the entire plan.
- Need the opportunity to look back and reanalyze the plan and the mission.
- Guidelines at a regional level with some flexibility at the forest level.
- Transparency; annual reports to the public regarding the results of monitoring. These could be posted to the internet.
- Planning/advisory team with the authority to halt projects with which they are not satisfied.
- Stewardship projects, with multiple resource consideration, as mitigation measures.

2.1 What Currently Works about Forest Service Planning?

What concepts would you like to continue into the next planning rule? (R1 Question 2)

- Emphasis on goals and desired conditions from 2005 rule good
- 2005 adaptive management works, Environmental Management System
- Need to say what you can do, not what you can't do
- Standards and guidelines
- Some standards and guides good, need changes to deal with uncertainties
- More emphasis on desired future conditions and less on standards and guidelines
- Standards provide clear direction and an adequate regulatory mechanism.
- Process should produce draft rule to bring to Forests and receive opinions
- Goals, objectives, standards, management areas
- Plan is a binding, common set of rules
- Collaboration, coordination, public input (how much is too much?)
- Local planning
- Resource-based
- Bring forward good science-based roads analysis process
- 219 coordination—proactive management
- Roundtable process used on the Lolo NF for the 2005 rule
- Public input period
- Web-based information
- Managing lands recommended for wilderness
- Keep the travel management maps
- Manage indicator species
- Able to fix part of the plan without having to do it all
- Wilderness management requirements
- Use the checklist format of the 1982 rule.

- The rule should talk to planners, not to special interests.
- A well managed ID team process.
- The NEPA process
- Retain the use of categorical exclusions.
- Cumulative effects analysis
- Recreation Opportunity Spectrum (make it enforceable)
- Limits of Acceptable Change
- FS has the authority and the obligation to consider recommended wilderness as wilderness, pending designation.
- The planning rule should emphasize resource management, not preservation
- Use of best available science
- Simple and clear direction to maintain viable vertebrate species.
- Taking the time to separate forest uses at plan level, when everyone has cards on the table.
- Developing collaborative process with stakeholders and using scoping process.
- Adaptive and flexible planning, bases on previous analysis.
- Need a substantial basis for plan negotiations within specific management areas.
- Biological evaluations
- Designate land management and suitability areas

2.2 What doesn't work?

What concepts would you like to leave behind? (R1 Question 3)

- Nothing is working now
- Standards and guides doesn't work, it's a list of what you can't do
- Planning rule should encourage productive involvement
- Rule should stress comments that provide information over opinions
- Inconsistencies
- Different terminology or interpretation of terms
- Takes too long
- Too infrequent
- Inaction
- Different scales
- Analysis on too large of a scale
- Static long-term planning
- Litigation-prolongs the issue rather than solving the problem
- Political influence
- Local special interest legislation such as Tester's bill by-passes NFMA and does not adhere to planning rules
- No standards and accountability
- Categorical exclusions for forest plans
- Allowable sales quantities
- Management indicator species

- Too much emphasis on timber.
- Wilderness as only a recommendation to Congress. This was divisive.
- Wilderness recommendations stop all activity because recommended wilderness areas are managed that way even without Congressional designation
- Pre-conceived ideas.
- There is a disconnect between process and budgeting.
- Outdated definitions, especially definitions related to timber
- ROS does not address mountain bikes; need updated definitions
- Lack of future forethought
- Don't use collaboration to replace public input required by NEPA. Collaboration is not always applicable, e.g. ESA. But, use collaboration where it is appropriate.
- Unrealistic commitments
- Monitoring requirements were not backed up.
- Remove the use of suitability and other ambiguous terms
- Should not be demands on other owners of adjacent lands to manage like the FS.
- Time frames in the current rule are difficult to follow.
- We do not need to restart from ground zero.
- Don't revisit scenarios from the 1982 rule.
- Multiple, failed rule development. Lack of clarity about which rule is in effect.
- Leave the old appeals process and use a pre-decisional objections process.
- The planning process should consider quality of life and amenity issues and how those impact the local economy, including visuals, recreation opportunities, quiet/seclusion, hunting and fishing.
- Forest plans should look at cultural and social changes in the community.
- Vague standards and lofty ideas.

2.3 **Other General Input**

• Greater amount of uncertainty in plans, hypothesis model—monitoring along the way, amending as you go

3. PLAN CONTENT

What should the rule require of plan content? (NOI process principle 3)

3.1 Information and Issues

What information and topics do you want to see in a plan? (R1 Question 4)

- Acknowledgment of the problems created by the current forest plans and identification of what will be done to fix those problems.
- Thorough analysis of the current management situation and problems.
- Explanation why the desired future conditions in the original plans were not met.
- Broad-level acknowledgement of management activity impacts on adjacent lands, e.g. impacts to water after the water leaves FS ownership.
- Agreements with other agencies for lands managed by FS.
- Inter-agency approach to land management; all land management agencies look at planning.
- Consider the impacts of activities on adjacent private land, e.g. private land development on lands adjacent to FS. Look at issues across boundaries, not just FS lands. Cumulative effects analysis that involves all lands. Planning and analysis should include the other landowners.
- Plans should outline a collaborative process for FS to work with adjacent landowners and agencies.
- Plans should be organized around larger boundaries that include all ownerships.
- Standards about monitoring; just need the specifics about monitoring that were absent in the 2005/2008 rules.
- Standards that guide project monitoring of impacts.
- Fire planning should be addressed within the forest plans, not in separate documents.
- Identify where fires are allowed for resource benefit and those areas where suppression will be used.
- Plans should address suitability and adaptability for multiples uses (fire, grazing, etc.) and integration of resources.
- Clear desired conditions of where FS wants to be in the future and use FIA (forest inventory & analysis) data to help with this. There should be desired sustainable conditions; overall ecosystem resiliency for forest and geographic areas, as in the 2005 rule.
- Plans should be developed with an EIS because the plans will be in effect for a long time and warrant in-depth analysis.
- Non-timber forest products and direction.
- Watershed management and species biodiversity
- Specific forest plan components
- Robust discussion and display of disturbance regimes, including fire.

- Plans should include a framework for adaptive management, including definitions, triggers and an evolving plan for monitoring measurable management objectives. Monitoring and adaptive management should also be connected with the budgeting process.
- The plans should have objectives that are tied to varying budget levels. Budgets should be part of the planning process, with realistic connections between plans-budgets-implementation on the ground.
- The monitoring framework should include thresholds.
- Right after monitoring, data should be displayed to quantify.
- There should be a checklist for the planners like the 82 rule that outlines the plan.
- The plans should contain a vision for the forest.
- The plans should be realistic, with objectives that are obtainable.
- Plans should have a robust recreation component.
- Plans should treat all resources equally, i.e. the same amount of attention.
- The plans should outline a transparent process for implementation.
- The plans should be forest/local specific and should focus on the local issues.
- The plans should use a landscape/all lands approach to planning.
- Plans should address uncertainties in relation to climate change, including monitoring.
- Plans should give equal consideration to other land designations besides wilderness, e.g. National Scenic Recreation Areas, etc.
- Plans should be more resilience built into them, specifically use an historic range of variability approach.
- Plans should be able to address population change.
- Plans should incorporate "limits of acceptable change" for each resource.
- Plans should have components that could regulate uses based on needs and sustainability (permitted uses/permit system).
- Plans should require coordination with local governments and vice versa.
- Landscape levels should be part of the planning process; a hierarchical approach in which the local level complements the national level and vice versa and that promotes regional ecosystem health.
- There should be clear distinctions between motorized and non-motorized recreational categories. "Mechanized" is a confusing term and should not be used. Bicycles should be separated from motorized use. Aviation should be a distinct category within motorized use.
- Plan should provide for changing and anticipated future recreational uses, e.g. anticipate that there will be an increased use of bicycles in the national forest.
- There should be a strong commitment to working with the state fish and wildlife agencies in a commitment to maintain viable fish and wildlife populations, management wildlife corridors and maintaining habitat connectivity.
- Forest plans should preserve clean water and provide for the management and enhancement of water resources on a large scale.
- Plans should provide for watershed health, provide a framework for decommissioning roads, fixing culverts, stream restoration, etc.

- Plans should address the 2001 roadless rule and provide a framework for roadless area enforcement.
- Provide for the management of the wildland/urban interface.
- Timber management should focus more on restoration.
- Plans should preserve old growth.
- Maintain grassland health for bird diversity.
- Plans should include commitments to allow natural disturbance regimes when possible; mimic natural disturbance with active management; and, a commitment to use passive management.
- There should be more emphasis on ensuring that wilderness character is preserved for wilderness; monitoring of wilderness character; management plans for existing wilderness; and, identify necessary staffing requirements.
- There should be a method for recommending lands for wilderness, including the designation of wilderness areas where bicycles (separate from motorized use) would be permitted.
- Aviation should also be distinguished from other motorized uses with aviation use of wilderness is permitted.
- Recreation should be addressed as a separate topic and with equal consideration in the plan as timber and other uses.
- Plans should include designated landscape area management; project level descriptions; and prescriptions for fuels, fish & wildlife, watersheds, timber and a spectrum of recreation uses.
- Use topics that are in the current plans and add wildlife migration corridors; needs for restoration (watershed and resource management); a section on restoration analysis, including standards, goals and objectives; and, a restoration action plan.
- Plan information should include an action timetable and a monitoring plan.
- Plans should designate limits of acceptable change for wilderness areas.
- Update the definitions that were used in previous forest plans. Change definitions to avoid confusing and contradictory terms.
- It is important for an EIS to be developed as the forest plan is developed, and done in a timely manner. The process also should be holistic and result in a landscape plan
- NFMA requires components of the plan and these cannot be changed. The law also recognizes that forest planning is a national effort.
- Collaboration is critical for public buy in. Involve local elected officials in the process. There is value in a collaborative process, like a RAC, to work through issues like recreation, wilderness, roads and restoration.
- Plans should identify resource availability and annual resource outputs AUM's, timber sale outputs, visitor days, burn areas, restoration, etc.
- The planning rule should identify basic plan requirements, including: Monitoring this is key to accountability; maintaining diversity in landscapes, habitats, flora and fauna; Adaptive Management a plan that allows for change and flexibility while maintaining accountability; appropriate places for various activities and land accountability; Scale size of planning areas, watersheds and analysis vs. planning scale.

- The planning rule should address the interaction of people; consider the social side of forest management and balance bio-centric with social-centric.
- Balance too prescriptive with not prescriptive enough.
- Allow for a "rolling plan", i.e. just do updates; include a process for doing minor and major amendments.
- Include a framework that allows management to respond to the challenges that will result from climate change; allow flexibility for adjustments as habitats change.

3.2 Shared Vision

Should the planning rule support the creation of a shared vision for each planning area and, if so, how? (R1 Question 5)

- There needs to be some direction nationally but latitude for local guidance to address local and regional needs.
- There needs to be regional consistency that guides forest plans within that region.
- Plans should be flexible and not necessarily tied to administrative boundaries. Objectives should be developed around ecological boundaries, watersheds, landscapes, etc. Boundaries might differ, depending on the specific objective.
- Shared vision will differ, depending on scale and planning might occur at multiple scales.
- Shared vision will require a commitment to a collaborative process. Different stakeholders with different visions will be a challenge.
- An emphasis on dominant uses will limit the opportunity to develop a shared vision. Who is doing the sharing? Who are the stakeholders and what is their vision relative to the FS' vision?
- The shared vision should include ecosystem resilience.
- Collaboration requires that all interests are fairly represented.
- Developed shared visions for specific planning areas, e.g. there is only so much back country while multiple values can be satisfied on other areas.
- Developing a shared vision should be at a level that is consistent with goals and likely will cross administrative boundaries.
- The shared vision should not be budget driven.
- The shared vision should not be top down. The plan should provide enough broad direction that there is flexibility within project level actions.
- There should be consistency in the shared vision.

3.3 Standards and Guidelines

<u>Should the new planning rule require standards and guidelines in all plans? (R1</u> <u>Ouestion 6)</u>

- The new rule should have standards and guidelines not be aspirational, like the 2005 rule and should provide certainty.
- Aspirational, i.e. desired future condition is a good concept because it provides direction and is responsive to the social context. But, we also need specific standards and guidelines.
- Standards should be present and always followed.
- Strong standards, goals and actions prevent too much discretion, which is not good for getting stuff done one the ground.
- Inclusion of standards and guidelines allows for broader public acceptance as the plan matures. Include a RAC-like structure (advisory only) on every forest to maximize implementation and acceptance of the plan.
- Standards provide for measurement against benchmarks that demonstrate that implementation is consistent with the law and, thereby, helps avoid litigation.
- Standards should be used, measurable and enforceable. If it can't be enforced, call it a guideline. Be honest about which is which. Standards are "shall do", while guidelines are guidance.
- Standards should be achievable. Standards provide for public confidence in the plan.
- Standards should be tied to desired outcomes.
- Standards should be site specific.
- At the project level, standards help avoid unnecessary arguments.
- Plans should be adaptable. Different areas of the USA are different and the planning rule should be aware of that.
- Standards and guidelines should operate on a set of assumptions that have been outlined. If the assumptions change, the FS can adapt.
- Strict rules do not always work.
- There should be some flexibility in the guidelines, based on adaptive management and changes in what is occurring on the ground.
- Standards should be measureable and there should be a monitoring plan to ensure that standards are met and to guide adaptive management.
- Standards and guidelines are not necessary. The forest plans should be outcome based, based on desired conditions.
- There should be standards for resources that are irretrievable and irreversible.
- There should be a standard that directs FS to look at all lands affected by its actions and requirements for contact with the affected parties.
- Should be focused on balancing actions based on what FS can't control (lands outside FS control).
- FS should be committed to always using the best available science and that could eliminate the need for standards.

- Plans should address the issue of balancing best available science vs. the social and political realities.
- Guidelines should help interpret FS manuals where there are gray areas.
- Standards and guidelines should be clear in their direction.
- Standards and guidelines should be based on the function and resilience of the whole ecosystem, rather than by resource.
- Standards should be specific to the different resource areas, specific direction for mountain biking and other recreational uses.
- Standards should be relevant over time as the plan ages and as there are changes in desired conditions.
- There should be zoning, designated recreation areas, etc. with standards and guidelines for each. Standards describe the management intent and the balance between ecological values and recreational uses.
- There are more conflicts of designation of the management areas than over the standards that apply to each of the areas.
- There should be separate standards and desired conditions for old growth.
- Standards are the big picture guidelines are more regional/local. Guidelines help to streamline the process where standards are too rigid to work effectively.
- There should be standards for elk habitat and standards for road density.
- There should be clear ties between standards and the goals that the plan is intended to achieve.
- Avoid the abuse of exceptions to standards, e.g. it would be inappropriate to cut large diameter Douglas fir to restore other desired trees or to achieve other habitat standards.
- There should be standards to address ecosystem values, habitat connectivity and exotic species.
- Standards should define limits of acceptable change, working from the regional level down to the district level. Include monitoring to ensure that standards and desired future conditions are being achieved.
- Standards should be adaptive. The rule should include an amendment process to update standards.
- Standards should be developed across the spectrum of the plan, e.g. for land but also for all recreational uses, etc.
- Collaborative process is critical to build standards and guidelines. Everyone should have the opportunity to voice the values to be addressed in planning.
- There should be full funding for monitoring and enforcement.
- Each forest needs the flexibility to follow its own rules.
- We need to be better at writing the rules and standards so that they are not open to interpretation.
- Guidelines are ambiguous, concentrate on writing good standards.
- Standards and guidelines only work if there are good definitions, they are monitored and measured with follow-up and enforcement.
- Standards should balance social, biological and financial impacts. Provide opportunities for the public to use the forests.

3.4 Scale

How should the planning rule treat national consistency and regional differences? (R1 <u>*Question 7)</u></u>*

- The Planning Rule does need to address the differences that occur between regions of the FS.
- Maybe the rule could say that each Region will look at trends to determine standards and guidelines.
- Planning should be consistent across all forests, but specific to local and regional needs.
- Local voices and opinions should be heard during the planning process.
- If the plans are developed using the EIS process, that helps address national consistency.
- Plan EIS's should help address regional/forest differences.
- The rule should not be so broad that regional/local differences get lost or that processes get applied that do not work locally.
- It is important to have national consistency when addressing species viability and climate change.
- Need to have direction on what the FS role is in relation to climate change.
- Need to have flexibility to address local and regional issues.
- There is a need for consistency in how mountain biking is addressed in recreational wilderness.
- Need to have some of the details of forest planning put into travel planning to simplify the planning process.
- There is a need for an Ombuds position in forest management.
- Need to establish a baseline on which to monitor.
- Monitoring needs and reviews should be based on local needs rather than on a national framework.
- There might need to be national consistency on climate change.
- Consistency in the measurement systems across regions, e.g. habitat typing.
- There needs to be a balance between national standards and a focus on local issues.
- Local issues are not necessarily confined to individual forests but are better defined by similarities at a landscape level.
- The planning rule should be robust enough to handle local differences, provide flexibility and make the tradeoffs between local and broader scales.
- A broad planning process might be acceptable both regionally and locally.
- There should be consistency in addressing similar management areas.
- There should be consistent and well defined terminology developed at a national level.
- There should be regional and local sideboards for some issues, e.g. species viability and to determine the appropriate level at which to manage for species viability.
- There should be national guidance for determining appropriate standards for species diversity.

- Definitions should be workable at a national level and flexible enough to accommodate regional differences.
- Acknowledge that there are shared human values at a broad scale. These are national forests and there are issues relevant at the national level. Broad, national intent should be reflected in the goals. Environmental protection is a national value.
- There should be some consistency in direction to managers who are working in different areas.
- Compliance with laws (e.g. ESA, NFMA, etc.) provides a level of consistency. Adaptive management provides for flexibility at the regional and local level.
- Bicycle should be treated consistently at a national level and not banned in some regions.
- Preserving wilderness character and recommendations for wilderness potential are national issues.
- One piece of legislation does not establish a blanket policy for all forests.
- Local knowledge (public and ranger districts) is valuable input. These people know the availability of local resources.
- The overarching guidelines should lead to the local collaborative process.
- The planning rule should be general, over-arching and providing guidance, while allowing the Forest Supervisors to fit their plan into it.
- The national level framework should establish a template for what should be addressed by the forest, i.e. consistency in requiring land allocations, recommendations for wilderness etc. Each forest will then provide the specifics but will not have the flexibility to opt out of required components.
- Forest plans should ensure sustainable management of healthy forests.
- The rule writers must adhere to the process through law (NFMA top down), while, through collaboration, the regional differences will percolate from the bottom up.
- If we ensure that there is an EIS process, that will help bring the regional differences to light.
- There should be coordinate among forest units.
- There should be consistency and connectivity between similar habitats on adjacent units.
- Need a consistent approach for addressing private in-holdings.

3.5 Other Content Input

SUBSTANTIVE TOPICS

4.1 **Restoration (NOI substantive principle1)**

How should the Forest Planning Rule promote restoration of national forest system lands? (R1 Question 12)

- Clarification of FS goals and mission statement
- Why is restoration separated, it should be included
- Rule should address what is in statute
- Restoration should be a large component of Rule
- Goods and services not meeting expectations of some of the public
- Restoring water quality to meet uses, protecting water quality to maintain uses
- Allow science to guide restoration
- Use science to forecast future range of variability
- Prioritize restoration where science shows restoration is needed
- Use of science in determining the need for restoration as well as our response
- Restoration in a climate change context
- Understanding distinct process, integration, better long-term effects
- Be careful not to lump climate change into restoration
- Restoration looked at ecosystem not landscape
- Flexibility in addressing outputs
- Better articulation of planning objectives
- Incorporate new/current technology and make it transparent
- Balancing complexities of planning and tradeoff
- Importance of monitoring to understand results of restoration
- "One and done" not realistic
- Mimic natural processes mechanically
- Maintaining natural processes important
- Historic conditions not included in FS definition of restoration
- Historic range of variability concept is helpful—should be used even with climate change in mind
- Historic range of variability should be based on science
- Rule should focus on ecosystem processes not historic conditions
- Rule should help index historic ecosystem functions with future
- Rule needs to be clear in defining restoration—to what end?
- Pre-settlement conditions not always realistic goal
- Resilience
- Diversity is the key to resiliency
- Hard to draw the line between resilient and not, what to measure?
- Some of the most resilient stands are those that have been managed in past

- Focus on resiliency not restoration (change terminology to new reference related to ecosystem resilience)
- Need to change our perspective from restoration to resilience
- Reference conditions may not be resilient condition
- Definition of restoration vs adaptation
- Plan for how to get there
- Focus is unclear, what are we managing for?
- Unclear what direction is from the nation
- Challenge of putting all aspects of multiple use together
- No agreement that there needs to be restoration
- Learn from mistakes, need to make mistakes to learn
- No longer managing primarily for timber
- Primary managing goals
- Managing for ecological restoration only
- Address issues dealing with forest health
- Rule should address broader scale with restoration (landscape)
- Rule should look at watershed and landscape scale in restoration
- Comprehensive approach beyond just trees
- Rule should look past ownership boundaries
- Rule should define restoration well
- Restoration should look at factors that stress a system
- Restoration should look at human activities that cause stress
- Restoration is second to maintaining what we already have
- Rehabilitated lands into wilderness
- Continue efforts to consolidate ownership (reduce checkerboard)
- Silviculture practices should focus on restoration silviculture
- Make a clear distinction between restoration and fuels reduction
- Rule should address how to respond to natural disturbances
- Rule must have mechanism to address unknowns
- How do we promote forest health?
- Need to develop a vision/understanding of healthy forest ecosystem
- Can diversity become more of a driving force in management proposals?
- Could the Rule and forest plans encourage establishment of a new economy that places different values on ecosystem health and diversity?
- Plans need to identify and develop desired conditions that allow forest resources to cope with changing levels of disturbance
- Need to find a mechanism that provides a framework for planning under unknown levels and types of disturbance
- Does NFMA really bind the FS to limiting planning to within the administrative boundaries?
- What are we restoring to and how are we defining the ecosystem?
- Defining restoration is challenging at planning rule level. May be more successful at regional level
- Acknowledge the social/economic issues and focus on place-based efforts

- Disturbance-based ecosystems need identification of reference conditions—are these conditions a goal or an objective? Develop a process for incorporating social and environmental
- Define process to provide clear understanding of how citizens can engage in identification of restoration needs and desired outcomes
- Concerns with our ability to move forward with restoration due to present condition of the resource and infrastructure
- Need pro rather than reactive management strategy
- Existing conditions of forest (lodgepole) and concept of diversity of the landscape and ecosystem
- Do we need to enhance diversity?
- How do we incorporate in the development of desired conditions?
- Restoration not currently included in forest plans
- Restoration principles are already being applied in some ecosystems/cases
- Need an agency-wide framework of principles as an emphasis
- Restoration is different in different ecosystems
- Passive restoration, mindful restoration
- No provision for restoration
- Rule should examine how forest plan will address restoration
- Zone for restoration?
- Emphasize restoration across the board
- Rule should address objectives for restoration
- Identify priority areas for restoration in forest plan
- Criteria used to determine priority areas—difficult, everything is a priority
- How to incorporate dynamism
- Establish geographic areas as priorities with room for adaptation
- Values affect priorities, public should weigh in
- Greater emphasis/commitment to monitoring relative to restoration
- Set standards for restoration objectives, clear objectives, metrics
- What are you restoring for?
- Need for flexibility
- So many options to use to prioritize criteria
- Look at full range of possibilities to restore for
- Monitoring of implementation and results or effectiveness, clear direction on both kind of monitoring
- Monitoring is under-funded. So big picture look can avoid random acts of restoration
- Restoration should be defined in a traditional sense, culvert replacement, road removal, not commercial logging
- Specific funding base, not reliant on timber sales
- Definition has assumption that we know a system is degraded and how to return to a natural state. Already assuming the FS knows how to fix it.
- Scale issue, plans need to incorporate broader areas, i.e. private land
- Likes definition of restoration aspirationally with climate change do not try to restore to pristine—unattainable state

- Feasibility key to restoration decisions
- Assessment and implementation key parts of restoration and budget accountability for restoration goals
- On Bitterroot have timber sales with restoration promises, but not completed because of loopholes or funding shifts
- More projects identified than can be completed, so process should be directed to some, avoid piecemeal projects
- Large scale effects, how to incorporate into plan?
- 10,000-40,000 acres is the scale restoration planning is discussed
- NRCS offers incentives, promote more public/private land restoration partnerships
- Offsite mitigation
- There are ways to use FS resources on adjacent lands (culvert replacement for fish passage)
- Can't restore ecosystems without coordination of planning processes between agencies
- Give restoration a higher priority in forest plans (implements other goals)
- Define what restoration is and how it is funded
- Road maintenance funding not adequate
- Restoration should be a higher priority to achieve Clean Water Act requirements
- Restoration should include carbon sequestration
- Current restoration and other activities are too short term focus
- Too many activities are allowed that impair resources because restoration is a lower priority than recreation
- Restoration should be part of the management process.
- Erosion as a consequence of roads and fires should be a priority issue, planting, seeding etc.
- Successful restoration will be difficult in some ecosystems.
- Forest plans should have a shorter, more timely process for implementation of restoration projects.
- The planning rule should provide direction for stopping the pine beetle infestation and promote restoration of the affected stands. Unmanaged beetle kill could result in large fires.
- Mature forests should be managed to reduce the risk of beetles and fire.
- There should be different levels of management for different areas, with some designated as wild lands, some designated for timber harvest and some designated for wildlife habitat.
- Restoration management should mimic nature, but not be too extreme.
- The planning rule should include a provision that allows for a rapid response to catastrophic events like fire and disease.
- The national policy includes too much oversight over decisions that should be made at the region.
- Proper management should reduce problems and promote forest health.
- Management should encourage regeneration.
- The planning rule should promote successional planting efforts.
- User permits could help to fund restoration and management.

- Restoration should result in a native forest or grassland community perpetuating itself without the need for re-treatments
- Restoration must aim to fix the underlying cause of forest, grassland, and/or watershed decline.
- Removing actions causing stress (such as livestock grazing, roads in streams, etc) is the most ecologically valid way to increase ecosystem resiliency and prevent degradation.
- Monitor restoration outcomes. Restoration budgets must include post-restoration monitoring of (1) desired outcomes and (2) triggers for changing management, both stated prior to restoration activities are begun.

4.2 Climate Change (NOI substantive principle 2)

How should the planning rule address potential affects of climate change? (R1 Question 13)

- *Rule should provide for plans to adapt to climate change factors, triggers and monitoring
- Rule should provide tools for managers to adapt to climate change, adaptive management
- Adaptive management in response to climate change should be realistic.
- Rule should be written in context of climate change
- Rule needs to address the uncertainty associated with climate change
- Incorporate what is known into Rule
- Develop interagency approach to climate change
- Manage currently, climate change is happening now
- Unknown elements of climate change do not lend themselves to consideration in planning rule
- *Manage for ecosystem resilience
- Better align resource objectives with ecosystem processes and dynamics
- There is a disconnect between budget processes and planning (adaptive management process)
- Implement what has already been planned
- *Understand the consequences of no action, good or bad
- Rule should allow forest plans to address natural resource concerns of climate change
- Rule should allow forest plans to look long-term
- Rule should address green house gas emissions
- Rule should maintain and adapt workforce to implement objectives, plans
- Objectives should address specific ecosystem, fire regime, etc.
- Rule should help prevent paralysis by analysis
- Appropriate carbon sequestration based on good science
- FS has access to models of effects of climate change
- Climate change needs to be dealt with at a broader level
- Too much leaf area index, less water available, increased fire risk

- Treat it or let it burn?
- Some models show increased precip around Glacier Park
- Plan should include regional effects of climate change
- Treatments with measurable results helpful to adaptive process
- Hard to measure climate change
- Rule on climate change needs to be incredibly adaptive
- 10-15 years is long enough to see huge changes
- May be beyond FS to measure climate change
- Plan for measuring success or failure essential to an adaptive plan
- Going to require a lot of monitoring
- Monitoring often forgotten when focusing on "doing"
- Monitoring and adaptive management are critical to adapt to changing conditions
- Monitoring can be improved to help respond to climate changes
- Revisit assumptions through monitoring to determine if they were correct
- Clearly defined thresholds for ecosystem responses
- Rule needs to address that FS is doing their best, future is unknown
- Wide science needed to adapt to change
- Use the best available science for climate change effects
- Value to having a relatively unmanaged system as a scientific baseline
- Incorporate science and values to manage for climate change
- Use best available science (What does "best" mean?) Science is not all consistent
- Half of public doesn't believe in climate change
- Create a best and worst case scenario (define parameters and baseline)
- Create environmental trigger points
- Rule should promote resiliency and those components are maintained
- Build aquatic and terrestrial connectivity link so species can move through ecosystems
- Determine if active or passive, facilitative or assistive practices for species movement
- Enforceable monitoring plan
- Utilize adaptive management
- Reduce system stressors because of climate change (roads, weeds, etc.)
- Manage for ecosystem services if they relate to climate change
- Planning cycle needs to occur frequently enough to adapt to change
- Plan on promoting healthy ecosystems rather than focusing on climate change
- Promote overall forest health
- Climate change and the effects of natural disturbance (level and intensity) need to addressed
- Is there a way of factoring a metric of change? What threshold would trigger changing the plan?—indicators could include reforestation results, diversity metrics, increased litigation, invasive species...
- How do we engage younger, future generations on this issue and NF management?
- How can delivery of goods and services from FS lands be designed to reduce our environmental footprint and respond to climate change issues?
- Scale and scope of climate change and temporal issues

- Need to factor in scale and scope of Rule in development, keep at broad coarse filter
- Plan for multiple scenarios of changing condition and maintain adaptability to adjust based on changes
- Access to forests is essential and needs to be maintained. Technology and means of access have carbon footprint issues.
- Need for more resource-based data to define existing conditions and change. Emphasize much more collection of on-the-ground data in a collaborative fashion
- Recognize the unknowns of climate change and address in plan development
- Rule wouldn't tell you exactly what to look at
- Climate change may affect many aspects of the forest plan
- Corridors for movement of plants and wildlife should be identified—connectivity
- *Emphasis on maintaining resiliency
- Need better understanding of what a resilient ecosystem is
- Vulnerability assessments for systems and species
- Develop adaptation strategies
- Past conditions should inform where we go, but are not realistic goals
- Different types of variability to climate change
- How do we respond to changes with indicator species?
- FS can't do much to help species population effects due to climate change
- Use indicator species to identify problem, don't hold agency responsible for keeping populations viable
- FS can cut back on its emissions, could have substantial impact
- FS could stop allowing things that cause additional stress to species/areas that are sensitive to climate change
- Some changes will happen that we can't do anything about (wilderness areas will respond to changes, but we can't do much about it)
- Road decommissioning, culvert upgrades, etc.
- Conflict between wolverine/lynx habitat and snowmobilers
- What is the priority, where do people fit in?
- Vulnerability assessment leads to options and trade-offs in plans
- Build in more collaboration
- Transparency
- Experience, local knowledge
- What kind of carbon sequestration should be in the plan? Carbon sequestration planning at forest level is not very efficient
- Carbon sequestration/historic levels and role in ecosystem function
- Manage forests and grasslands to mitigate/sequester carbon in addition to addressing climate impacts
- Consistency to identify old growth forests at a national level to feed national improvement, some target based on science
- Old growth management areas defined in plans, not much managing going on
- Old growth forests as carbon sinks contribute to slowing effects of climate change
- May learn that old growth isn't good for carbon sequestration

- Each forest plan would identify the role of the forest in carbon sequestration, not necessarily to influence management
- Every forest could complete a green house gas inventory, similar to vulnerability assessment, some other entity could do this
- Make sure FS considers scientific knowledge of role of forests in carbon sequestration
- Resources outside of FS budget
- Forest Inventory analysis has not addressed sequestration
- Also consider non-forest systems—grasslands and issues with invasives, impact of invasives on animals (bull trout) and plants
- Planning legislation focuses on process and not values that are important, such as restoration
- Watershed health and TMDLs are key to resilience to climate change, fires, etc.
- Promote/retain cover to retain snow pack through restoration, replanting after fire
- How does beetle kill fit with climate change? Do industrial scale logging here
- Uncertainty about how many dead trees/burned acres in an ecosystem is resilient
- Recent fires have changed the landscape drastically
- Pilot planting more resilient vegetation after disturbance than historical veg.
- With so much uncertainty how do you rely on the predictions?
- Revisit assumptions through adaptive management
- Last Rule used adaptive management to skirt environmental regulations. Still need to follow regulations as a tool for addressing climate change.
- Climate change is a reason to focus on restoration
- Acquiring in-stream flow water rights could improve resilience of watersheds, fish, and people
- Prioritizations in the plan with land use designations—is the main use of FS lands for carbon sequestration?
- Would the issue of a surviving timber industry trump other issues? Want to see families in timber survive
- Potential for a restoration economy is untapped and could provide a transition for the timber industry
- The planning rule should acknowledge that climate change is real and include direction to allows for management in response to increase temperatures, reduced water and other effects of climate change.
- Increase the size of the riparian/streamside management zone.
- Manage stream temperatures for fish survival.
- Climate change should not be a management factor.
- The Rule should promote environmental stewardship regardless of climate change.
- The Rule should recognize that it might not be possible to save every species.
- The Rule should promote resilience and forest health in management, to enable the land to adapt to climate change.
- Regain resiliency through reduction of actions/improvements causing stress.
- Establish measurable goals for removing stressors.
- Create enforceable standards for ecological monitoring and triggers for adaptive management in response to monitoring results.

4.3 Watershed Health (NOI substantive principle 3) 4.3.1 Watershed Approach

What should the planning rule say about water resources and watershed health? (R1 Question 14)

- The planning rule should promote a proactive approach to managing erosion.
- Forests should be managed for water resources. Water and watersheds should be a top priority in the planning rule and in FS management. Management should promote water quality and water quantity. Water quality is crucial.
- Watershed boundaries should be protected and taken in account during the planning process.
- Management should occur at the watershed level.
- The planning rule should require the quantification of the value of water for the downstream users.
- The planning rule should recognize the economic value of water that comes from FS lands.
- Water management should be at the regional and unit level.
- Watersheds should be mapped as units for planning and management.
- Water resources should be managed to promote recreation.
- Work and collaborate across administrative boundaries and across public and private land boundaries.
- The planning rule should promote resilient watersheds.
- Watershed health is an acceptable term.
- Should restore degraded water quality
- Maintain high water quality
- Active management to maintain water quality (post fire restoration, etc.)
- Address broad scale issues of fire over the long-term
- Address the need to protect watershed value from catastrophic fire
- Rule should address watershed function
- Rule should address large scale disturbance effects on watersheds
- Cooperative, flexible standards based on utilizing best science
- Rule should direct agency to do science-based analysis
- Adopt science-based enforceable standards for ensuring watershed health
- Rule should define and develop sustainable outcomes
- Rule should provide broad scope of sustainability to provide direction in forest plans
- Need to know long-term need for land management
- Everyone likes clean water
- Health includes water quality and quantity
- Rule should address road maintenance for water quality
- Right-size the road system
- Need roads to manage forests, roads not always bad, need balance
- Can't remove roads for sake of water quality if you need to manage forest

- Road decommissioning has been a successful temporary strategy (lots of cost)
- Analysis of taking out roads often insufficient
- Roads are often benign, shouldn't be a priority to remove them
- Road density not the indicator of watershed health
- Current rule doesn't discuss roads
- Primary access roads often follow water
- Temporary roads are less damaging than the alternative when managing lands
- 60% of drinking water comes from national forest lands—water quality should be a focus
- Soil and water resources have been lumped together in past—maybe they should be separated
- Could management area concept go away? Management areas could be broader geographical landscapes. How to work into forest plans?
- Watershed processes will reflect influence of climate change
- Quantity/water availability will become huge issue
- Rule should direct looking at watershed scale—consider large landscapes
- So many scales appropriate to each resource—hard to define
- Some goals will contradict each other
- Consider different things in each treatment
- Addressed at a higher level—watershed analyses, what to manage for in each area in the watershed
- Push analysis down to project level—may be a disaster
- Goals come from watershed-wide assessment
- Getting out of analysis paralysis
- More efficient implementation, less costly, redundant planning--watershed-scale planning helps
- Senator Tester's bill works with this concept
- Projects lumped into one analysis area for NEPA—efficiency
- Rule should affect complexities of plans and activities on watershed uplands
- Look at cumulative effects of the watershed from an all-lands perspective
- Actively work with other land managing agencies to manage at watershed level
- Rule should define the levels of a watershed
- Rule should require an aquatic conservation analysis to prioritize regional watershed restoration
- Watershed issues go beyond fisheries and water quality perspectives
- Expand watershed health from a natural to a social resource (health, recreation, economic..)
- Prioritize protection for municipal works
- Watershed health a top priority
- Utility water resources (dams) the larger the impact, the less we use
- How do we value water quality?—municipal watersheds, health of aquatic ecosystem, what are the measures of the economy of watershed management? irrigation, wilderness dams

- Significant challenge integrating watershed and aquatic restoration in concert with providing goods and services
- Proactive management to avoid crisis mode
- Identify critical areas for watershed restoration Aquifer/natural resource processes need to be recognized for restoration. Consider all values (ecological and social) for aquatic resources and maintain/restore where needed.
- Need to accommodate beneficial uses of water as defined by states
- Need to recognize states' rights to water in plans
- Trade-off with watershed restoration and reductions in motorized action
- Need to coordinate plans with local and state government
- Coordination aspect of 1982 rule needs to be carried forward into new Rule Formalize the process for consideration and coordination with locals
- Focus on all-lands approach in development of direction for consideration of water resources (as well as all resources)
- Consider cumulative effects across all lands
- Beneficial projects for water quality and fish often detrimental in the short term Short term detriment OK for long term benefits
- Problems/stressors with water quality and quantity often outside FS control Work on blocks of pure FS lands
- Cumulative impacts of past and future activities should be part of planning process
- Identify areas where in-stream flow protection is needed
- Comply with Clean Water and local, state, and federal water protection laws
- Monitor for specific water quality standards at different points as a way to guide actions upstream
- This is the yardstick that could be used to determine whether an ecosystem is resilient—and used to set realistic goals for other activities
- Is the planning rule the place to put all these issues together?
- Need monitoring to know how you are doing—quantitatively
- Would restoring watershed health work to achieve more specific goals, like restoring Ponderosa pine?
- Watershed is the appropriate unit of scale
- If you go beyond 10-40,000 acres, it's hard to understand cause and effect. At this scale can determine vegetation variability that is OK
- Important to measure change
- Watershed scale thinking can transcend human boundaries in planning (Ex. Agreement between Montana and Alberta) Long-term commitment to restore/protect watersheds (Ex. Process on Big Fork is leading to watershed de-listing)
- Look at different planning scales to make sure resources are still available even with climate change
- How does national funding get divided between the areas and agency, how does it translate to results? Emphasis on more funding for watershed health
- Riparian areas should be more strongly protected in the planning rule than it was in the 1982 Rule because that is key to watershed health
- Not giving water the priority it needs relative to other resources

- Climate change means we will have less water, so protect the quality
- Adopt science-based, enforceable standards for ensuring watershed health and function
- Prioritize watersheds for restoration and protection.
- Annually monitor watershed health and restoration.

4.3 Watershed standards, guidance and Best Management Practices (BMPs)

4.4 Diversity of plants and animals (NOI substantive principle 4)

4.4.1 **Providing for Diversity**

At what landscape scale should the Forest Service analyze and provide for diversity of plants and animals (individual unit, watershed, landscape scale)? What are workable ways to incorporate a broader perspective? (R1 Question 15)

- The planning rule should not be too specific regarding scale. Need flexibility to allow for a species-dependent analysis scale.
- Recognize local skills.
- Require the scale to be at the forest level, with the flexibility to use a landscape-level scale.
- Coordinate between adjacent land management agencies.
- The planning rule should set basic guidelines, including designating standards and guidelines for species diversity.
- The national planning rule should not specify forest-level management decisions.
- The watershed is a practical level for planning.
- Look at ecological niches and range in analyzing diversity.
- Have to look at all levels, depending on the resource or species. Match the scale to that which is being analyzed.
- Look at other land ownerships, including state and private land. Species don't recognize administrative boundaries. Consider an amalgamation of lands and include interagency cooperation in the planning. Work with other agencies to provide for a consistent approach.
- The analysis should consider the broader scale even though the decisions will be by forest.
- Use the principles of conservation biology.
- Species diversity should be maintained with viable populations of all vertebrate species. Start by evaluating vertebrate populations on each forest and expanding to the northern Rockies.
- Move from the local to the regional scale.
- Focus on individual species populations and identify the threatened populations.
- Look at the movement patterns of species on a larger scale and maintain the travel corridors. Plans should address needs for connectivity across land ownerships.

- The scale depends on the species. Look at diversity on a hierarchy of scales.
- Consider geographic boundaries and watersheds. Use modeling to assess different features.
- It is more important to maintain a healthy forest and managed to limit catastrophic fire. That will take care of species viability.
- Don't waste forest planning money working on private land.
- Need to consider species on private lands but don't include private land in the plan. Consider how species are affected when they cross boundaries.
- In the landscape level analysis, private landowner needs should be identified and given equal footing in the planning process.
- Monitoring of all resources should be a strong component. Take advantage of species monitoring done by other agencies. Forest plans can supplement existing monitoring of species and habitats, within budget realities.
- Need to identify what resources need to be monitored and focus monitoring on the most appropriate variables; variables that can be measured and yield meaningful information.
- It is important to monitor bull trout and the factors that affect their populations.
- Management of species should focus more on habitats than population dynamics.
- The scale of management should promote higher productivity on the ground.
- The scale should promote efficient analysis and support on the ground implementation.
- The watershed scale is broad and difficult. The landscape scale is very specific.
- Identify species of concern and interest and focus management on those species.
- Species are not necessarily the first priority. Need to think of all of the landscape resources.
- Breakdown habitats by ecosystems.
- Address diversity from a hierarchy, starting from the landscape scale, e.g. Crown of the Continent and then moving down to the ecosystem level and then to communities and species.
- Consider rare situations and natural range of variation.
- Consider the location of cultural features, including those adjacent to private property. Keep location in context when making decisions about scale.
- Planning should consider past land management decisions, timber harvest, fire, etc.
- The scale of management changes, based on which indicator species are used.
- Management of rare species should be based on where the species naturally exist and the factors that impact their natural range.
- Gather baseline data to use for determining species of concern and historic conditions and distribution.
- Manage at the watershed scale, but at multiple levels, codes 1 6.
- Planning should be large enough to accommodate diversity, but limited to FS lands. FS doesn't have authority to manage private land and should not dictate private land management. FS planning should consider activity on those lands in its planning.
- Private landowners should be informed of and involved in FS planning.
- Multi-scale considerations are essential to have a better sense of sustainability.

- FS plans should reference other existing plans, e.g. state wildlife action plans, crucial areas and corridors identified by the Western Governors Association, etc.
- Planning should emphasize collaboration with multi-interest groups.
- Planning should consider potential future FS land acquisitions.
- As appropriate, use both a coarse filter and a fine filter approach to planning.
- Plan and manage for associations of species rather than individual species in the context of multiple use. Maintaining connectivity is important in the western states.
- Use an ecosystem approach rather than a single species approach.
- Recreation should be considered as part of connectivity.
- Use national data sets like NatureServ, e.g. G1 and G2 species as in the 2005 rule.
- Look at scales larger than forests and do more interagency coordination.
- Plans must consider threats from invasive species.
- Plans should strive for consistency in how species are managed.
- Change "ensure viability" to a more workable goal, given that some factors are outside the control of FS, e.g. climate change.
- Coordination between forests at the landscape level.
- Ensure consistent data collection methods within forests and among agencies.
- Ensure the integrity of customs and cultures of local communities.
- Protect diverse species and maintain local economies.
- Maintain healthy, sustainable forests through management.
- Forest planning must analyze the beetle infestation and provide direction for management.
- Need the ability to adapt quickly to changing conditions, e.g. beetles, grizzly bear corridors.
- Define the level at which the forests should address mushroom and berry permits; uniform permitting system.
- The management goal should be the maintenance of potential natural condition, including the identification of reference communities.
- Scale of planning should be based on individual watersheds.
- Manage for species viability on a project by project basis.
- All species should be monitored at both a coarse and fine scale.
- Monitor the processes that affect species compositions.
- The baseline data should be established for sensitive and rare species.
- There should be different approaches at different scales to ensure a holistic approach.
- Monitoring should be larger than just project by project.
- Implement monitoring in the planning cycle.
- Maintain ecosystem services.
- Monitor and measure all forest and ecosystem processes.
- Assessment of monitoring goals should be made by research groups.
- Establish collaborative monitoring committees.
- Forest plans should include a monitoring plan, developed by the scientists.

4.4.2 Protecting At-Risk Species

(written comment was submitted, no roundtable question on this topic)

Retain enforceable viability standards from the 1982 NFMA regs.

- Retain the management indicator species (MIS) component of the 1982 NFMA regulations.
- Retain wildlife corridors.
- Adopt strong riparian function and diversity standards.
- Monitor wildlife habitat and populations after projects.
- Require enforceable standards for wildlife habitat management, esp. TES species.

4.4.3 Monitoring

4.5 Ecosystem Services (NOI substantive principle 5)

4.6 Contribution to vibrant local economies (NOI substantive principle 5)

What should the planning rule say about how plans deal with the provision of goods and services that contribute to vibrant local and national economies? (R1 Question 16)

- Look at the Multiple Use Sustained Yield Act, include what is required by that law.
- The planning rule should include a strong acknowledgement that FS goods and services are linked directly to local economies.
- Recognize local officials in a partnership, including a RAC-like program for forests.
- The planning rule should recognize how forest planning affects local economies. Many Montana counties have large federally owned land area and play a large role in the local economies.
- Use of RAC's to implement the Secure Rural Schools and Community Selfdetermination Act should be emphasized.
- All economic impacts pro and con should be recognized for long-term sustainability.
- The planning rule should protect the natural environment.
- Recognize the value of dispersed and human-powered recreation.
- The restoration economy is important.
- Maintaining roads and maintaining roads to trails has economic benefits.
- Don't ignore economic benefits. Proposed wilderness eliminated bike trails and associated visitor uses.
- The planning rule should capture the economic benefit to tiny towns from forest operations or changes resulting from the new plan.
- Historic uses should be balanced against potential future uses when establishing plans that affect local areas.

- Include the value of ecosystems and water uses in the economic analysis.
- Increase the analysis of the value of recreation and tourism and the effects on local economies and social structure.
- Most vibrant local economies have both a wilderness and a multiple use component. Strive to balance.
- Consider the potential for over uses.
- Need a good inventory to establish the baseline.
- Take long-term view of economic values of sustainable ecological systems and restoration.
- Recreation has long-term economic value.
- Promote recreation as a way to promote local economies.
- Better facilities, signs and better maintenance will attract more people.
- Make FS facilities family friendly.
- Promote and manage for a healthy forest to enhance user experiences.
- Increase interpretive and education signing. More knowledge will increase visitor # .
- Increase law enforcement so that one user doesn't ruin experiences for others. Increase the budget for law enforcement.
- We need more monitoring and surveys of users.
- The planning rule should not preclude traditional economic uses of the forest.
- Firewood collection should be considered as an economic use.
- Forest plans should encourage best value contracting.
- Stewardship contracts should include revenue sharing with local counties, schools.
- Allow FS to provide smaller contracts.
- Support secure rural schools through forest management.
- Do what is best for the forest through proper management. This will benefit visitors, hunting, environment and recreation.
- The Rule should encourage collaboration with scientific expertise and local users.
- Citizens in the region need to have more weight than the national plan.
- Towns are dying away from the lack of timber management. FS needs to get back into the timber management business. We need to learn from the past about what we can be doing today.
- Economics should be the focus of the Rule and important part of the planning process
- Quick to blame FS, but the issue is the FS's ability to manage based on the 1982 rule.
- Timber imports and other external influences affect local timber-based economies.
- FS could subsidize some local land management activities.
- Restoration economy could have long-term payoff even if not profitable in short term.
- The planning rule should require an analysis of impacts on small communities. Plans should include provisions to maintain economic sustainability of communities.
- Need to restore the balance between sawmill capacity and the availability of resources. FS should work with local communities to develop this balance.
- A guaranteed amount of resource should be available to make for viable business.
- Plans should provide enough predictability for flow of goods and services from the forest to maintain local infrastructure.
- If the forest is actively managed, the local economy will take care of itself.

- Forest plans should identify the lowest economic areas and identify ways to contribute to the economy.
- Plans should specify needs of local economies, what they require to be more vibrant.
- Analysis should be a monetary value on resources, clean water healthy soil, air, etc.
- There should be a tie between tourism and non-economic use of the forest.
- The Rule should require a look at ecosystem services and how to measure them.
- The Rule should require comparison and evaluation of different resources on a comparable level.
- Balance specific values with flexibility to meet changing resource needs.
- A good plan should balance different resources without one dominant use.
- We are in a position to balance and to take into account multiple values. E.g. expansion of Lost Trail ski area has been good for Darby and its tourism economy.
- Whatever industry we pursue, it should be sustainable in the long term.
- The planning rule should address mineral extraction as an additional resource that supports local economies.
- Balance mining with strong environmental protections.
- Analysis of mining should be different from that for other resources because it is non-renewable.
- The planning rule should consider the strategic role of minerals in the world economy, to defense and technology.
- Mining includes gravel deposits as well as precious metals.
- Consider the role of a growing tourism economy on the FS. Fees could be collected from tourists and outfitters could pay fees based on the income they receive from activity on the national forest.
- Power lines and other infrastructure should be considered in forest plans.
- NF's are part of community and should be considered that way in making decisions
- The planning rule should address sustaining economic infrastructure, i.e. timber and recreation.
- Recognize and promote economic values and how decisions made in the planning rule will affect local economies.
- Because there is a strong link between recreation and the economy, the Rule should look at new, diverse recreational opportunities and development to support recreation.
- The planning rule should look to the future and fit people into that picture.
- The planning rule should anticipate how changes will affect future uses.
- The purpose of the FS and national forests is evolving, was timber production. But, does the FS still have an obligation to maintain timber production as a priority?
- Keep management appropriate for the specific area conditions and whether those uses are suitable at that level.
- Emphasize multiple and accessible use, keeping options open for all interests.
- Jobs associated with forest management need to remain consistent.
- Avoid public backlash in response to management decisions.
- Promote restoration to ensure a local job market.
- Keep jobs local. Determine what we want on the land so that the local infrastructure can adapt to it.

- Include language that will ensure a supply of product, in response to demand, but not necessarily a harvest quota. Promote restoration, fuels mitigation, timber harvest and production of biomass.
- The planning rule should help to define the federal government's role in the future development of biomass projects. These projects are expensive. Will the government provide subsidies and incentives?
- Small scale projects are difficult and not always economical.
- Consider renewable energy as a part of the portfolio and manage in a way to support and encourage this new market.
- Plans should coordinate with local governments.
- Plans should quantify the benefits to local economies that result from recreations.
- Maximize production of goods and services, implementing projects on the ground. Treatments, fisheries improvements, etc. should help to sustain rural economies.
- Sustaining rural economies should not trump or conflict with ecological considerations and services.
- Recreation needs to be given higher significance. It provides opportunities for enhancing local economies.
- We need a full recreational analysis, analysis of goods and services and an analysis of ecosystem services seek a balance.
- Not all amenities are quantifiable.
- Need to look at alternatives in terms of economic impacts.
- It is not the job of public lands to make people rich.
- Consideration for uses should be in the context of restoration or timber harvest.
- Restoration of ecological and watershed functions should be prioritized. A work force that is trained in restoration would be a benefit to local economies.
- Think about the special role/niche played by the FS and what fits. Be proactive.
- Stewardship contracting is an appropriate vehicle for achieving restoration.
- Flexibility and adaptive management can help to energize markets.
- Monitoring is important to adapt decisions. There should be a strong agency commitment, including funding.
- Forest planning process should consider the economic impacts of the various management scenarios under consideration.
- The planning rule should require analysis of economic impacts at multiple scales.
- Planning process should analyze the economic and ecosystem tradeoffs of grazing and provide up to date information on current grazing use.
- Identify resources with local economic value.
- Recognizing changing demographics and the economy; the historical timber economy it changing to aesthetics and development.
- Plans should address the economic loss and visual degradation that results from fire.
- Provide for species as well as local economies.
- Planning should recognize that people who do not live in the local economies still have a vested interest in national forest management.
- Public education; inform people who are outside stakeholder about why management is occurring the way that it is.
- Local communities consider the forest to be their backyard, have sense of ownership.

- FS should support but not interfere with local economies.
- Planning rule should encourage maintaining local economies to encourage younger generation can stay in their communities and address the concern of declining local economies due to job loss.
- The planning rule should require an analysis that clarifies the influence that FS management has on local economies.
- Forest plans should address non-timber forest products; standardized permits for commercial uses like mushroom harvest, berry picking, medicinal plants.
- Difficulty in assessing non-timber forest products and that makes it difficult to determine economic values.
- Plans should provide guidance on economic development and trail tours.
- A local economic analysis for a range of recreational opportunities should be included in planning.
- Travel planning should be done within the forest plan.
- The economic analysis should be inclusive, including value of clean water, nonconsumptive uses, etc.
- Analysis should include consideration of the trade-offs of land uses.
- Natural resource values, not short-term local economic goals should be the priority.
- Maintain resources for future recreation needs and population needs.
- Forest plans should define the public trust responsibilities at the local level.
- Considering local values is important but they should not usurp national values. Enhancement of community economies is not required by law.
- Give first consideration to ecological conditions.
- Ecosystem services are primary.
- Emphasize appropriate green jobs.
- Enhancement of rural economies must not come at the expense of ecological needs.

4.7 Use and Enjoyment of NFS Lands (NOI substantive principle 5)

What should the planning rule say about suitable uses?(R1 Question 17)

- Suitability should just pertain to timber harvest suitability. Use appropriate or compatible terms instead of suitability for other uses.
- Eliminate use of "suitability" as a planning term.
- FS needs immunity from lawsuits in areas where multiple use recreation is allowed.
- The planning rule should be simple, general, allow for consideration of all uses.
- In areas with vast amounts of land (western US), allow space for all uses.
- Different planning is needed for eastern and western forests.
- Forest planning should be weighted for localized issues.
- The national planning rule needs local input. Local equals the county, the state and the region.
- Planning must consider and not exclude historic uses.
- Forest plans should consider and coordinate with county resource use plans.
- There should be more coordination with state policies and plans.

- Consider the need for firewood before closing roads. Removal of firewood and also help to reduce fuel loads.
- Multiple sets of rules and plans related to travel and use is cumbersome.
- Each planning area needs local input. The FS should allow for a broad range of activities and uses to meet each area's needs.
- Simple and loose rules are needed at the national level to avoid litigation.
- More collaboration will help to solve conflicts among users and uses.
- State and county government needs to be more involved.
- There are no user conflicts there are use conflicts.
- User groups need to participate and be collaborative.
- We need more user education to be more respectful of other groups and needs.
- Participants need education and knowledge to be part of the planning process.
- Local knowledge should be included in regional planning.
- The planning rule should strongly encourage or require local collaboration.
- Big picture: the planning rule must recognize recreation as a principle use of the national forest.
- The 1982 rule has a section on recreation. But, the NOI did not mention recreation.
- Almost anything could be a suitable use unless it causes long-term detrimental harm.
- The planning rule could outline a comprehensive list of suitable uses and each region could incorporate the uses that fit that geographic area.
- The planning rule could define the conditions that establish a suitable use, e.g. the 1982 rule defined how to manage for wilderness.
- The planning rule could define how to implement decisions to ensure consistency.
- On issues like climate change, the planning rule could define a consistent process for developing the response.
- Need to balance structure and local flexibility.
- There could be a consistent approach for managing recommended wilderness.
- Suitable uses should be defined. Those should be uses that are sustainable and don't take away from the resource in perpetuity.
- The planning rule should identify suitable uses.
- Recreational uses should have specific topic areas that define suitability. It should be the same level of detail that timber had in the 1982 rule.
- Build in flexibility to accommodate new uses and uses that are not currently occurring on the national forest.
- We need a holistic/ecosystem approach to recreation opportunities, consistent with recreation management practices.
- The planning rules needs to address more landscape level planning.
- Utilize limits of acceptable change, including monitoring, both within and outside of wilderness.
- The planning rule should require collaborative planning for recreation with adjacent forests and grasslands.
- Identify current and historic uses.
- Some uses can overlap but don't expect to manage for all uses on every acre.
- Forest plans should include land use allocations.

- Ensure multiple use and delineate areas for certain uses.
- Study areas should not be the same as closed areas.
- Allow primitive trails to be opened up and maintained again.
- Backcountry use should include roads and 4x4 vehicles.
- Zoning priorities might need to change. Currently, suitable equals timber production. Zoning should emphasize other priorities.
- The planning rule should balance national and local input in determining the indicators for suitable use.
- Road and trail networks have a large influence on determination of suitability.
- Avoid eliminating areas where special interests feel that their land allocation is already limited. Motorized use areas are being reduced or eliminated.
- Wildlife connectivity is impaired by development. People don't tend to want to live close together in rural areas. This results in conflicting interests.
- Recreation is a suitable use and should be addressed in forest plans.
- The ROS is still relevant as a forest planning tool and as a basis for allocating suitable uses. Use it to make landscape level decisions.
- It is important to distinguish between ecological and social impacts. Take a more scientific/analytical approach in evaluation uses.
- Social values should also be considered in the analysis.
- The analysis should look at suitable uses, with general categories identified in the plan, e.g. timber production, motorized use.
- The forest plan does not equal a timber management plan. Designating and allocating suitable uses are two different decisions.
- Travel management should be by area, not by trail.
- Recreation should be considered at least as highly as timber management was in the 1982 rule.
- Plans should consider/provide motorized and non-motorized access for recreation.
- Suitable use designations should go further than timber and grazing.
- All legal activities should be managed according to impact determinations.
- There should be more recreation programs covering larger areas, e.g. undaunted stewardship.
- Bicycling should get a unique and separate analysis.
- Forest plans should identify where oil and gas leasing is not appropriate.
- Address suitable uses, as required by NFMA.
- Plans should clarify that suitable uses determined are not an exhaustive list. Other uses can be considered in the future.
- Concentrated uses can result in overuse and land degradation.
- Provide adequate room for all use types to ensure ecosystem integrity.
- Designate specific land use goals and follow through with management.
- Set priorities; ensure plant and animal species diversity, first, and logging, second.
- Ungulates and wolves are changing where they live.
- Suitable uses should include non-timber products and permits for both personal and commercial uses mushrooms, berries, etc.
- The connection between local products and local economies is important.

What should the planning rule say about access, visitor facilities, and services? (R1 Question 18)

- Provide ample access for a variety of users and abilities.
- Recognize the value of our road and trail system. Keep roads open to the public.
- Travel management should be analyzed under NEPA, separate from the planning rule.
- The planning rule should include impact thresholds (standards and guidelines) in the forest plans.
- The planning rule should recognize the connects between recreation and consumptive uses.
- Maintain and sustain the infrastructure of our national forests for future generations.
- Recognize the importance of youth involvement in national forest management and planning.
- Recreation should be an important part of forest plans. Address multiple uses, including access for people with disabilities. Use a universal design.
- Promote ways to get youth into the forests. Combine with resource stewardship.
- Recreation is not just an impact. The plan needs to encourage recreation. There should be more guidance regarding the social effects of recreation and encourage guiding/teaching opportunities.
- Inventory all recreation resources, including rock climbing.
- Recreation is important and is sustainable, referenced in the Multiple Use Sustained Yield Act.
- Access should be based on an inventory, not on a preconceived agenda. A personal agency agenda should not have a role.
- There should be a compelling environmental reason to prohibit bicycles in recommended wilderness areas.
- There should be environmental reasons to not allow specific recreational activities in any category of forest lands. Decisions should not be bases on pre-conceived ideas regarding uses.
- The planning rule must direct planners at all levels to consider and provide for motorized and non-motorized public access to FS lands for recreational purposes whether by land, water or air.
- Access needs should include consideration of access to private in-holdings and mining claims.
- Better define the parameters for wild and scenic rivers before doing the local planning. Base planning on a local recreation inventory, balanced with national policies.
- Be very clear about the legal decision space for recreation.
- Rely on social science, not local FS opinions.
- Rely on the FS manual and handbook. Differentiate between social and environmental conflicts, clearly discussing both sides.
- There should be more splitting rather than lumping of uses in analyzing impacts on the land. There should be clear categories between motorized and non-motorized

uses and all uses should be analyzed for sustainability. If a use has been allowed in an area and the area still looks natural, that use should be allowed to continue.

- Use the best available science in evaluating uses.
- The biological and natural environment and habitats and social sciences should be strongly evaluated when analyzing suitable uses.
- A national level is appropriate to identify the types of recreational use, but the plan should be developed at the local level.
- Suitability should include consideration of minerals, special uses and private property rights.
- Address the practicality of recreational use of back country airstrips. These can also provide for rescue and firefighting.
- There are not enough facilities. There is a need for more parking areas and trailheads for ORV and stock use.
- Standards for parking areas at trailheads should be sufficient to accommodate trucks and trailers. Existing size restrictions should be reviewed and changed.
- Local needs and uses should be considered for access and facilities.
- Need flexibility at the regional level to accommodate user needs.
- There should be a policy for easements and access to all FS lands, especially in areas with checkerboard ownership.
- The planning process should be streamlined to allow for a more timely implementation of decisions.
- The planning rule needs to allow non-traditional uses bicycles and airplanes.
- Local and regional experience should be taken into account.
- Recreation has economic value and should be prioritized in the forest plans.
- User fees should only be charged for services, e.g. use of developed campgrounds. Otherwise, the fees should be encompassed in state and federal taxes.
- Minimize the use of concessionaires. Don't privatize FS services.
- The planning rule should include accessibility guidelines and universal designs for construction.
- The planning rule should clarify how access fees will be used.
- Pilot projects that tested the use of access fees were not successful.
- Trying to resolve the question of access fees will derail the process for developing the planning rule.
- Access is important because it is how the public views the FS and values the forest service system.
- Access to the national forest is widely perceived as a public expectation and it should be free.
- Fee decisions come from Congress. How fees are used should be made at the forest level, working with a RAC.
- Universal access to the forest is a key visitor service.
- The FS should not be in the business of providing large visitor centers, e.g. L&C NF.
- Interpretive centers are a good way to educate the public and provide service.
- Small centers in FS offices are acceptable.
- More interpretive centers and year round access would be good.

- The planning rule could provide direction about whether to locate more campgrounds and visitor centers.
- Focus facilities roads, trails, airstrips, etc in areas where there is a true need, based on the results of monitoring. The public should be involved in these decisions.
- Look at opportunities to expand existing facilities as an alternative to new developments.
- The planning rule should provide flexibility in responding to changes in the economy.
- Emphasize future uses of the forest.
- The planning rule should have only a 10-year planning cycle.
- Recreation is one of many ecosystem services.
- Base future conditions on social values as well as science values.
- The planning rule should emphasize education and recreation resources by using new and improved ways of getting information out to the public, e.g. leave no trace.
- The planning rule should allow for the use of good judgment as well as science in designing land uses.
- The planning rule should require a look at access issues, services and visitor facilities. The plans should establish management areas with appropriate levels of access and services. The analysis should take into account changing demographics and an aging population.
- The planning process should examine and explain how private rights, mining and special uses could affect management areas and access to special use areas.
- The rule should require plans to address roadless designations so that they are not handled project by project.
- Access should address the need for forest health treatments.
- The planning process should account for urban pressures.
- Plans need an accurate inventory of current access and treatment.
- In Montana, there is an obligation to provide access for Montana citizens.
- Sometimes motorized use needs to be eliminated to ensure multiple use.
- Recognize all of the services that FS provides including fire suppression, access to private in-holdings, wildland/urban interface fuels reduction, habitat for rare species to keep them off private land (bears and wolves).
- The forest plans should analyze and define management of fire suppression. Plans should designate where and how fire will be managed.
- The FS should not be responsible to ensure the safety of private property (dust abatement)

4.8 Other Substantive Input

Recreation Access Written Comment: The planning rule must direct planners at all levels to consider and provide for motorized and non-motorized public access to USFS lands for recreational purposes whether by land, water, or air.

5 **PROCESS TOPICS**

5.1 Plan Revision Process (NOI process principle 3) 5.1.1 Improving Timeliness and Efficiency

What suggestions do you have for making forest planning faster, simpler, more straight forward, and less expensive?(R1 Question 8)

- *Get out in the community early, find out their interests and issues
- Need catalyst for early participation
- Convenience—make it easy for people to participate
- Invite communities to host planning meetings
- Accept comments through entire scoping process
- *Post comments so they are more transparent
- Realistically, it won't be faster or simpler, important to involve all interests and accept all comments
- Funding mechanism for local governments, communities, and working people
- Provide facilitator to help build/involve community participation
- Tool to help understand stakeholder interests (local vs. national interests)
- National interests are represented by local people
- Give locals credit for knowledge of national interests
- Redefine definition of "expert" for FS (social scientist, etc.)
- Need broad knowledge to communicate with locals
- Look at cultural landscape and social boundaries (watershed) rather than Forest boundaries
- Mutual learning between scientists and locals, build trust
- More decisions made at the forest plan level
- More effects analysis, make project level more efficient, part of plan decision
- Watch scoping issues move through process
- Have simple straight-forward rules
- Have strategies to avoid litigation after decision is made
- Rules that are clean
- Keep stakeholders involved throughout the process
- Make language in rules simple
- Hold meetings at the Ranger District level
- Adaptive management in forest planning, prioritize before it goes out of date
- Adapt to changing industry (e.g. timber)
- Work to involve citizens to participate in FS meetings
- Leadership should get information to all interests
- Post comments early and make apparent to public
- FS should go to citizens

- Public needs to stay informed also
- Planning rule to penalize late participation, incentive for early participation
- Require involvement at 3 meetings, web participation
- Streamline so locals can understand and participate
- Make part of performance evaluation
- Congress capping budget for forest plan revisions
- Overall planning process should be uniform throughout the country, apparent to everyone
- Keep it grassroots, they have the knowledge to make the plan work
- *Let local people play a stronger role
- Guidelines/details should come from the regions
- Has to be a timeframe—a goal, agency needs hard, self-imposed time deadlines
- Needs to be an end—a point where the FS makes a decision
- Shorter timelines encourages more active public engagement
- Need good information. Short cuts equal conflicts equal delays
- *Accurate, ongoing monitoring and cataloguing of data
- Clearer guidance on decision space
- Stronger local collaboratives working toward solutions
- Collaboration is key—but needs to be bolstered by scientific review
- More responsibility on regions, forests, districts to complete plans
- Analysis of lessons learned from current rule
- Incorporate a science committee in developing the rule—people with knowledge and history
- Collaborative process needs to be balanced with a wider national perspective
- More transparency, accessibility (data, analysis)
- Plans should be managed locally, not from WO
- Plan should be a living document, work in progress, change what needs to be changed over time
- Periodic simple review and adjustment by deadline
- Plan, monitor and work in sections that need ongoing review and updating
- FP has range of things to do, must amend if action goes beyond that range
- Need sideboards that define/limit flexibility
- There should always be an amendment process
- Standards provide parameters—flexibility is in the guidelines
- Stakeholder monitoring group at local, regional levels
- Need national science review panel to augment local/regional stakeholder group and work with local group (e.g. Aldo Leopold Center)
- Uncertainty should not be an excuse to do nothing
- Use the precautionary principle, but still need to do something
- Use focus groups, encourage regular feedback via websites
- *More conversations, face-to-face meetings (in addition to web access)
- Bring in all interests, engage them throughout the process—get broad range of input
- FS needs to make the effort, provide information, open up the process
- *Use the RACs

- Make plans, studies, data available online
- *Educate public on what is possible on decision space
- Invest in monitoring
- Regular communication with public—by all different ways
- Should require an EIS
- Look at BLM's process and learn from that
- Ask Congress for a change to NFMA
- *Focus on the spirit of the law in designing regulations
- *Planning rule standards (e.g. viability) need to be achievable and reasonable
- Have an independent panel critique plans or rule
- Difficult to make a new plan every 10 years

5.1.2 Scheduling of Revisions

How often should plan revisions occur, and should the entire forest plan be redone in each revision cycle? (R1 Question 9)

- Small changes as you go along, adaptive management
- Early, often and meaningful
- Amending plans should be easier
- Remove 10-year mandate, create rolling plan making amendment process easier
- Plans need to be reviewed, updated on a regular basis
- Ideal, every 5-10 years, but needs to allow for ongoing adaptation
- years not long enough to observe trends
- 20 years, need to be broader to allow for changes
- Analysis, paralysis process adds 5+ years to make changes and it can be interrupted by higher priorities such as fire
- Not necessarily in sync with NFMA rules
- Plan stays the same, supplemental NEPA would reflect changing conditions
- Create tight sideboards on level of NEPA required for incremental plan changes
- Change smaller elements rather than the entire plan
- Adaptive policy letter addressing "issue of the day"
- Broad rule at national level (standards), specific guidelines at local, regional levels
- Forest Supervisors know forest area better
- Closer look at Equal Access to Justice Act and how it applies to forest planning
- General national rule needs to limit litigation, ex. "Planning will consider riparian areas" with no specifics given at national level
- Use collaboration process with stakeholders, involve RACs
- Lengthen process up front will be faster in long run
- Include national representation on collaborative group to provide broad spectrum of experience
- Collaboration—have found participants were picked to achieve an outcome
- Coordination of stakeholders including local govt as part of the planning process
- Collaboration is a good investment

- Plans should be living documents with flexibility
- Should be able to fix sections without changing entire plan
- Do NEPA on section being changed
- Project by project plan amendments don't work
- Should do program change—not site specific
- Is there another environmental analysis process that is more streamlined?
- Can we re-evaluate sideboards, ask Congress if needed?
- Update existing plans, quick plan amendments

5.1.3 Addressing Uncertainty

How can a new planning rule build in flexibility to adapt to changing science, information, and new data? How should the Rule deal with uncertainty? (R1 Question #10)

- Effectiveness of effects analysis
- Build trust through local monitoring
- Recognizing local knowledge
- Rule should increase authority for local level decision making (Forest Supervisor)
- Local line officer can decide if there is a need for change in plan and start process
- Create new tools for local knowledge and information to flow to FS
- Monitoring process should be decided by scientists, but locals should participate in the actual monitoring, give locals the criteria to use
- Use coordination, citizen scientists
- Involve locals and other agencies besides FS in monitoring
- Need budget for monitoring
- Inter-agency collaboration in monitoring
- Agreement on scientific data during planning process
- Protocols for monitoring that are a balance between local observations and national scientific data
- Improve communications/disconnect between national and local interests
- Create science councils at different levels
- What happens with changes in science and changes in social interests?
- How to incorporate changes into forest rules?
- Changes come from new science and mitigation decisions
- Make sources of FS science apparent
- Hard to be consistent
- Need to change plans quickly and efficiently, almost continuously
- Elevate the amendment process
- Contextually define plan to more easily make changes
- Planning process shouldn't limit what plan can be used for, be adaptable
- Allow flexibility for regional and local changes
- Find balance between certainty and flexibility

- Need to have strategic goals (landscape conditions, social goals)
- Flexibility to use current science.
- Change Forest Plan to incorporate new technology (Ex. ATVs and snowmobiles)
- Plan should encourage ability to narrowly define the scope of an amendment or revision
- Changing timeline
- Critical to make narrow plans
- Look into new technologies in forest plans (wind power)
- process
- Deal with uncertainty without stalling
- Best management practices as part of monitoring process
- Don't be afraid to try something even with uncertainty and incorporate this into plan language
- Plans need to include lands, resources adjacent to NF boundaries, landscape scale
- Have realistic goals we are planning to meet
- Understand where the ecosystem boundaries begin and end
- Monitoring is reward for plan participation
- Rule should allow for continual loop of monitoring and adaptation—timely application of new knowledge
- Fully funded monitoring, data collection and analysis
- Include socio-economic monitoring
- Visitor use monitoring
- Need implementation and effectiveness monitoring
- Plans for monitoring should account for budgeting realities and budgets should account for monitoring realities
- Rule should clarify difference between monitoring and research
- Incorporate new science through monitoring
- In dealing with uncertainty, apply precautionary principle, some in group uncomfortable with precautionary principle because if might prevent action in face of uncertainty

5.2 Local and Regional Difference?

5.3 Planning Update (Amendment) Cycle (NOI process principle

- 3)
- 5.3.1 Ease and Frequency of Doing Amendments5.3.2 Adaptive Management
- 5.4 Forest Planning Compliance with the National Environmental Policy Act of 1969 (NOI process principle 3) Complying with NEPA in the Development of Forest Plans
- 5.5 Collaboration and Coordination (NOI process principle 1) 5.5.1 Public Involvement

What is the best way to involve stakeholders, including adjacent landowners in the planning process? (R1 Question 11)

- Go to the people rather than inviting them elsewhere.
- Difficult to involve citizens. Find incentives to involve the public
- Informal communication
- Need new processes for holding meetings, accepting public comment
- Each community is unique
- How do you reach silent majority?
- Make it relevant to citizens, research
- Challenge for continuous commitment
- Clearly identify stakeholder groups
- Find way to connect locals to Forest Ranger
- Use website posting, mailing lists, different ways of informing land owner
- E-mail lists, it is stakeholders' responsibility to find out and engage
- Interactive GIS important so everyone can understand
- Rule should address communication between groups—easier now with new technologies (video conference, GIS, etc.)
- Where are the landowners and identify what they are interested in
- Directly involve adjacent landowners from the beginning
- Make sure those most impacted are well represented in the process
- Difficult to get collaboration in individual communities because of dominating interests
- Best decisions made closest to the ground
- Need more proactive approach
- Make FS approachable on a consistent basis
- Bring planning down to local level with cohesive groups (watershed, geographic area)

- How to incorporate national interests if building from bottom up
- Information sharing across agencies
- Planning rule won't be silver bullet
- Build something in for local jurisdictions
- Shorten and simplify process so people stay involved (in 1 to 2-year process)
- Make plan implementation apparent to public
- Break process into segments, focus on one area at a time
- Different scales of interest, local interest most important
- Each forest in the region should work together and communicate
- Consider common management practices when developing forest plan
- Common boundaries between forests should have compatible directions
- Change status of access
- Balance local land owners with outside recreation interests
- Engage state agency partners (and other federal and tribal interests)
- FS should inform federal agencies, also different stakeholder-user groups
- Make outcomes of collaborative meetings available soon after meetings
- Participants volunteer their time to attend and can burnout, they expect paid FS staff to produce meeting results quickly
- Identify appropriate stakeholders
- Elected public officials represent all stakeholders, include these officials in the process
- Follow up with stakeholders before it becomes a conflict
- *Take opportunity to mitigate conflicts before they arise
- Accountability to stakeholders, show how they are part of the plan
- Need to consider balance of local, regional, and national interests
- FS needs to define decision space based on regulatory responsibilities Collaboration must not circumvent regulatory responsibilities, <u>particularly</u> those for public involvement (NEPA).
- NEPA's EIS process is essential; collaboration is not.
- Any collaboration must be formally defined.
- Emphasize in-person, in-field discussions.
- Provide non-local members of the public with clear and <u>equal</u> opportunities to participate in planning efforts outside of the collaborative context.
- Consider amending forest plans by sector.

5.5.2 Coordination with other Agencies and Governments

5.5.3 Review and Appeal Processes

5.6 "All-lands" approach (NOI process principle 2)

(Received in written comments, did not have roundtable question on this topic)

- Partner with state and other federal agencies to identify areas of common planning interest, including areas of shared watershed/ecosystem responsibility (e.g. a whole mountain range).
- Ensure the public is involved in interagency collaborations.
- Partner with private landowners to restore watersheds and landscapes across public/private boundaries.
- Prioritize municipal watersheds that exist on, or cross between, forest service and other ownerships for "all lands" restoration efforts.

5.7 Rulemaking compliance with NEPA (NOI process principle3)

5.8 Other Process Input

- Require measurable desired conditions and clear, enforceable standards.
- Base plans on current and best science that is peer reviewed.
- Comply with NEPA and prepare an EIS for every Forest Plan.