



Regional Summary Report  
Pacific Northwest Region 6

US Forest Service Planning Rule  
Public Roundtable Discussions  
April 6, 2010 -- Portland, Oregon

Share Your Knowledge



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## Executive Summary

Five recurring themes emerged within and across roundtable discussions regarding the new Forest Service Planning Rule in Portland, Oregon on April 6, 2010. As the purpose of the roundtable event was to obtain broad input and inspire discussion, not to resolve differences, these themes should not be construed as consensus. They are included in this report to generate further discussion here, in other regions and at national roundtables. They reflect Region Six participants' experiences, perceptions and understanding about the Planning Rule, including substantive and process principles.

- **The new Planning Rule could redefine the role of management plans to “restore and sustain.”** This vision was voiced by participants who disagree (and sometimes litigate) on detailed plan elements. While there are statutory constraints to consider, Pacific Northwest participants demonstrated a feeling of personal ownership and responsibility for the welfare of their National Forests and adjacent lands and communities. Many participants described our National Forests as priceless local, national and global assets requiring a guiding Rule that will focus on ecosystem restoration and sustainability supported by local communities, which are in turn sustained by a forest based economy.
- **The new Planning Rule could ensure that the task of restoring and sustaining is carried out at all levels.** The Rule could apply a broad definition of sustainability that includes environmental, economic and social factors. Instead of starting an analysis of ecosystem needs, the planning task could be approached with an analysis of all three needs. The range of this task would include habitat and species diversity; functioning ecosystems such as watersheds; corridors used for wildlife and corridors used by humans; timber and mining practices, education, recreation, and employment; the health of interconnected ecosystems which provide adaptability and resiliency to stressors and change over time; and partnerships with local communities and private land owners that are needed to effectively address ecosystem restoration needs and resource dependent local economies that cross public/private boundaries.
- **The new Planning Rule could require that plans be developed from the outside in rather than from the inside out.** The Rule could clarify roles and processes to encourage stakeholder engagement at the front end of the plan development process and minimize the need for engagement through litigation at the far end. More than 200 participants want to stay involved in the development of the new Rule and to play a collaborative role in developing individual forest plans as well. The broad attendance, active participation, and focused follow up by participants reflect this commitment and desire. Many participants believe that a new Rule should prescribe a broad but efficient collaborative planning process with flexibility on who makes the decisions, and at what level, about various elements of the plans at the outset to avoid the need for “collaboration” by lawyers, experts, judges, etc., after the fact.

- **The new Planning Rule could help save time and money by authorizing layered analysis and planning.** The development of separate forest plans is a huge and expensive process. Time and money could be saved by requiring collaboration at a regional level. Regions can inform the national level and the individual plan level. Developing multiple forest plans together would allow planners and science teams to be shared and not stretched beyond their effectiveness. A regional approach might start locally by bringing together communities of interest in a collaborative process to develop local goals, then bringing their goals to a regional meeting to work through the larger scale.
- **Simplify the new Planning Rule: Focus on desired outcomes. Don't make a Rule that tries to address all things. Don't ignore legal and statutory constraints.** Provide flexibility and accountability to the regions and individual plans for determining the best way to achieve benchmarks or goals. To make the process efficient, require the regional level to develop outcome-based targets and goals that match the Rule's objectives and that are measurable and quantifiable. Each Forest would then make decisions such as: "Based on the resources we have, we're going to meet these targets by doing this," OR "We're not going to meet these targets because we are unique for these reasons." This approach would provide accountability, is goal-oriented, and can be monitored.

These themes represent a sampling of the ideas and recommendations from the Region Six roundtable discussions and are not areas of complete consensus, although they do reflect some overlaps in perspective and issues of concern. There are many more suggestions in the roundtable meeting notes following this summary, and the participants want the rule-writing team members to know about them all.

## Introduction

The U.S. Forest Service recently announced its intention to develop a comprehensive new Planning Rule to meet future management needs for the nation's 155 national forests and 20 grasslands. As a new Rule will have significant environmental, economic, and cultural ramifications, the U.S. Forest Service initiated an extensive collaborative process to engage citizens, interest groups, and governments in discussions to address these issues in a new Rule. The goal is to develop an effective Rule that provides a structure for developing management plans and is effective over time.

In support of this national collaborative process, the Pacific Northwest Region (Region Six) hosted public roundtable discussions on April 6, 2010, in Portland, Oregon. The day's activities included three collaborative sessions, which opened with plenary presentations followed by roundtable discussions, as well as two open house options and a live public webcast.

Each session began with welcoming comments by Regional Forester Mary Wagner who participated throughout the day. Each session also included a presentation by the Director of Resource Planning and Monitoring Phil Mattson, who explained the elements of a Planning Rule relative to and distinct from individual Forest Management Plans.

The roundtable format was designed to support discussions that discovered and reflected ideas and areas of agreement or disagreement within Region Six on issues related to a new Rule. Roundtable topics were based upon the eight substantive and process principles outlined in the Forest Service Notice of Intent published in the *Federal Register* on December 18, 2009. An additional roundtable to discuss recreation and enjoyment of NFS lands was added to reflect strong public interest. Facilitators for each topic encouraged participants to share their knowledge, opinions and ideas in the context of making recommendations to the rule-writing team.

The event in Portland was attended by 162 participants and 48 online viewers. The themes highlighted in this report are drawn from their input and discussions. After the roundtable sessions, comprehensive notes taken during the discussions were posted online and participants were invited to review and clarify them where necessary. Those detailed meeting notes, including additional written input, are appended to this report.

## Meeting Overview

### Meeting Location and Participants

- Date of Meeting: April 6, 2010
- Location of Meeting: Portland, Oregon
- Number of Meeting Participants: 162 attended in person, excluding U.S. Forest Service staff, and an additional 48 joined the live webcast

### Point of Contact for the Worksheet Summarizer

- Schwennesen & Associates, an independent consulting firm specializing in environmental mediation, collaboration and strategic meeting planning, was contracted by the Institute for Environmental Conflict Resolution to design and facilitate this public roundtable event in close coordination with Region Six leadership.
- Roundtable discussions were led by independent professional facilitators. Forest Service staff did not participate actively at the roundtables but provided information and served as resource teams when requested by roundtable participants.
- Person completing these notes: Lois Schwennesen; Schwennesen & Associates  
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## **Diversity of Attendance at the Meeting**

The appropriate categories are checked to indicate presence at the meeting:

### **Financial Users**

Oil and Gas  
Timber Users X  
Outfitters X  
Ecotourism X  
Ski Areas X  
Grazing Permit Holders X  
Mining X

### **Users**

Off road Vehicle X  
Mountain Bike X  
Horse Riders X  
Hiker X  
Wilderness X  
Neighbor X  
Cabin Owner X

### **Academic**

Science X  
Economics X  
Planning X  
Adaptive Management X  
Global Climate Change X

### **NGOs**

Endangered Species X  
Environmental Groups X  
Sustainable Communities X  
Environmental Justice X

### **Other Governmental Entities**

Fish and Wildlife Service X  
EPA  
BLM X  
County Government X  
State Government X  
Tribal Government X

### **Forest Service Staff**

Regional FS staff X  
National FS staff including  
Planning staff X  
National Grasslands X

## **Affiliations of Participants at April 6, 2010 Roundtable**

An extensive outreach program was implemented to maximize awareness of the national collaborative effort to develop a new Planning Rule and to encourage a broad-ranging diversity of public participation from throughout the Pacific Northwest. Communities of interest represented at the regional event in Portland ranged from grassroots environmental groups to state and county government officials to representatives for commercial organizations including timber, grazing and mining entities. Individual participants ranged from self-described “concerned citizens” to professional lobbyists.

The following list of represented affiliations was obtained from the meeting sign-in sheets. As some participants did not sign in or did not list an affiliation, the list should not be considered complete:

1. American Alpine Club
2. Alaska Power Company
3. Alliance of Forest Workers and Harvesters
4. American Forest Resource Council
5. American Hiking Society,
6. American Rivers
7. American White Water
8. Associated Oregon Loggers
9. Association of Oregon Counties
10. Association of O&C Counties
11. Back Country Horsemen of Oregon
12. Back Country Horsemen of Washington State
13. Back Country Hunters and Anglers
14. Bark
15. Benton County
16. Cascadia Wildlands
17. Central Oregon Intergovernmental Council
18. Cougar Area Trail Seekers
19. Clackamas Stewardship Partners
20. Clallam County Commission
21. Conservation North West
22. Crag Law Center
23. Curry County Commission
24. Cycle Wild
25. Defenders of Wildlife
26. Washington Department of Natural Resources
27. Douglas County Commissioner
28. Eastern Oregon Mining Association
29. Emerald Trail Riders Association
30. Eugene Water & Electric Board
31. Forest Service Employees for Environmental Ethics
32. Gifford Pinchot Task Force
33. International Mountain Bicycling Association
34. Institute for Culture and Ecology
35. Intertribal Timber Council
36. Jefferson County Commission
37. Josephine County Commission
38. Lake County Commissioner
39. Lane County Intergovernmental Relations
40. Latino Farmers and Ranchers Rural Coalicion
41. Linn County Commission
42. Mason, Bruce & Girard, Inc. Natural Resource Consultants
43. Mountaineers
44. National Center for Conservation Science and Policy
45. National Forest Foundation
46. Natural Oregon
47. Natural Resources Defense Council
48. Northwest Mining Association
49. NW Quad riders
50. NW Ecological Research Institute
51. Okanogan County Commission
52. Oregon Motorcycle Riders Association
53. OR Beef Council
54. OR Forest Industries Council
55. OR St Snowmobile Association
56. Oregon Department of Forestry
57. Oregon Hunters Association
58. Oregon State University
59. Oregonians Water Park
60. Oregon State Snowmobile Association
61. Outdoor Alliance
62. Pacific Rainforest Wildlife
63. Pacific Northwest Four Wheel Drive Association
64. Pacific Rivers Council
65. Portland State University
66. REI - Recreational Equipment Inc.
67. Rocky Mountain Elk Foundation
68. Save the Riders Dunes
69. Sentinel Orchards
70. Sierra Club
71. Silvies Valley Ranch
72. Siskiyou Project
73. Skagit County Commission
74. Skamania County Commission
75. Stevens County Commission
76. Stevenson-Carson School District
77. Stoel Rives Law Firm
78. Sustainable Northwest
79. Washington Cattlemen's Association
80. Washington Trails Association
81. The Nature Conservancy
82. The Wilderness Society
83. Tillamook County Commission
84. Trout Unlimited
85. Tulalip Tribe
86. Umpqua Watersheds
87. US Fish and Wildlife Service
88. Wilderness Coalition Washington
89. Winter Wildlands Alliance
90. Washington Association of Counties
91. Recreational Aircraft Foundation (RAF)
92. Western Environmental Law Center
93. Wildlands CPR
94. Woodacre
95. Yakama Nation

## Ideas and Recommendations

Because the rule-writing team must consolidate and consider input from many regions, each note taker at each roundtable developed a record of the discussion for Region Six consistent with the worksheet format used in other regions. The notes from each roundtable topic vary slightly to reflect the unique conversations held at each table.

Complete, unformatted notes from the meeting were made available to all participants for review following the discussions. To protect the integrity of participant input and the transparency of the collaborative process, the resulting document (which includes participant review and clarification) is appended to this report in full and has not been further edited or consolidated. The rule-writing team also has been provided with these notes as well as individual written comments related to the April 6 event.

Outlined below are examples of ideas that emerged from the roundtable discussions. **These summaries are presented here to give a sense of the breadth and variety of suggestions and input, not to replace the need to review all suggestions attached.** All participants did not agree on all of the following comments, but some or many participants agreed on each of them.

### What works: Concepts from current Rule that some would like to see continued

- Forest Service staff that listens to all sides.
- Collaboration with the public on developing plans; this concept should be expanded.
- Mandatory use of the best available science, and the mandate for agencies to explain why the scientific data they use is the best available.
- The viability mechanism to maintain diversity; add plants to the viability protection.
- Section 219.7 of the 1982 Planning Rule (which requires USFS coordination with local government) which should be included in the new Rule and be a mandatory part of the process.
- The Forest Service should maintain a viable environment as the NFMA requires, not manage specie by specie.
- The Rule's focus on multiple use directed by MUSYA, NFMA and Organic Act.

### What does not work: Concepts from current Rule that some would like to see changed

- The new Rule should address the lack of quantifiable national/regional goals with strong benchmarks to which the Forest Service can be held accountable.
- The NFMA requires that plans be revised every 15 years; the new Rule should require that plans are updated more frequently based upon the current and future pace of scientific data modeling and technology.

- The current process is too slow and must become more nimble; plans must be made more flexible in order to adapt to changing issues and best available science.
- The previous Rule doesn't explicitly address climate change. There's a need to update plans more quickly to address climate change.
- More consultation is needed between USFW, USFS and BLM to be proactive and collaborative.
- The current Rule does not sufficiently emphasize monitoring of environmental damage.
- The NEPA regulations need to be changed for the new Rule to work.
- The Rule needs to have more specific goals for diversity of species and wildlife habitat and require that plans determine how the goals are reached and maintained.
- The Rule should acknowledge that recreation is one of the multiple uses.
- Mandatory statutes are non-discretionary, and more detail is needed to clarify, simplify, and speed up implementation of the new Rule.
- The Rule needs to be clear that all statutes related to Forest Service management plans will be addressed and adhered to (i.e. multiple use, sustained yield, mining, etc.).
- By enacting the NFMA, Congress effectively appointed scientists to inform the planning agency in 1982. When the Rule was revised in 2000, another community of scientists worked with the Forest Service to integrate the best available science. Now, there is no committee of scientists dedicated for this forum. The new Rule should codify when it is necessary or appropriate to go outside the agency for scientific input.
- The Rule must fulfill the requirements of the NFMA. The underpinnings of the 1976 National Forest Management Act are not being focused on effectively.
- The Rule needs a Preamble that outlines basic core values to be addressed in all management plans to provide a national context.

### Concerns/Problems with Plan Content

- Plans do not consider socioeconomic issues involved in climate change (i.e. shifting economics from timber to ecosystem services and the impact on community health).
- Plans do not adequately address local governments' socioeconomic issues, including possible revenue streams to county governments generated by use of public lands in a new economy to offset those lost in changing industries.
- Plans need greater ability to adapt to local conditions. The Rule must find a balance between setting specific standards/directives which would assure all plans meet a high level of measurable outcomes as well as the flexibility needed to achieve the outcomes.
- Local government and local stakeholders have not adequately been included in plan content development.
- Plans should be outcome-based rather than prescriptive.
- The Forest Service should be more than a land management agency and plans should reflect that wider mission.
- More than 15 years is an important planning period in light of climate change timelines. The EIS needs to recognize these changes and have benchmarks along this continuum.



- Analysis of ecosystem needs alone does not provide a broad enough picture. Social and economic impacts and needs should be equally analyzed.

### Recommendations for Plan Content

- Adaptive Management: Accommodations in ecosystem benchmarks for dramatic changes over relatively short periods of time.
- Performance Evaluation and Guiding Principles: A monitoring process to ensure efforts initiated under a new plan are robust and proactive. In addition to any system of monitoring or evaluation, precision and clarity are needed in the plan itself.
- Plans should reflect “desired future conditions” for each region (population & habitat thresholds, forest health parameters, water quality parameters, etc.).
- Plans should have interim measures/benchmarks that are outcome-based every five years on a 20-30 year plan time frame as opposed to the current time frame of every 10-15 years. This requirement would hold the USFS accountable and support adaptive management to meet goals and desired outcomes.
- Plans should include an inventory of habitats to use as a foundation for planning future restoration efforts.
- Plans should allow for changes in and movement of habitats and ecosystems as the effects of climate change grow more pronounced.
- Plans should respect the relationship between NFS Lands and Neighboring Lands: Restoration and conservation should adhere to ecosystem boundaries, not political borders or jurisdictions. Forest planners should collaborate with nearby communities, landowners, and cabin owners to address specific factors appropriate to their region.
- Plans should address energy policy, focusing on renewable energy.
- Plans should analyze specific economic impacts.
- Plans should recognize human needs to recreate outdoors as a functioning part of an ecosystem. These needs should be included in budgets and planning.
- Plans should be anchored in Rule-specified definitions of “recreation” and “recreational use” based upon solid environmental and modern social science (i.e. environmental impacts of bicycling at various sites); plans should identify local employment

opportunities that contribute to the current and future health of ecosystems and that are representative of clean energy.

- Plans should address soil/water protection as the foundation upon which the rest of the plan is built. Standards and monitoring need to be established for non-degradation of soil/water.
- Plans should use a broad definition of sustainability to include the three elements of environmental, economic and social impact; there is some FS conflict regarding the last two, which are not equally weighted with the environment. Plans should address three equal spheres, with requirements for social and economic analysis as well as environmental.

## Summary of Input for Substantive Principles

I. Plans could address the need for **restoration and conservation** to enhance the resilience of ecosystems to a variety of threats.

- The Rule should include a statement of values for guiding future interpreters of the legislation. The idea would be to ensure that sustainability, resiliency, and permanence of the ecosystem are not subjected or subordinated to other values such as recreational or extractive uses.
- With regard to forest ecosystem recovery, preventing erosion is a tool that should be addressed in the Rule as a possible benchmark to help in making decisions regarding roads, by linking decisions to erosion and sedimentation issues.
- The Rule could replace the “historic range of variability” concept with ecosystem resiliency as an end goal.
- The Rule should recognize the intrinsic relationship between carbon density in old-growth forests, the opportunity for establishing carbon preserves, native diversity, and watershed health as they contribute to a healthy ecosystem.
- The Rule should clearly establish standards regarding biodiversity, as well as a definition of what makes a species viable, to provide flexibility for managing new or lost unique habitats.
- The Rule should recognize adaptive management as a priority, including accommodations in ecosystem benchmarks, for dramatic changes over relatively short periods of time. Forest plans could then address how plant and animal species will be affected by the return of large predators to ecosystems.

- The Rule should address advisory scales or checklists to help distinguish between sizes and magnitudes of which fires are encouraged to be fought versus which to be left alone.
- The Rule should address the ambiguity about current roadless regulations stemming from legal challenges that arose in response to 2001 legislation of roadless areas; a stronger set of tools and regulations would assist in forest planning.
- Restoration and conservation should adhere to natural ecosystem boundaries, not simply political borders or jurisdictions.
- With the growing effects of climate change, resiliency of ecosystems might be a better goal than any defined benchmark. Managing for natural processes would allow forest ecosystems to move in whatever direction these processes take them.

II. Plans could proactively address **climate change** through **monitoring, mitigation and adaptation**, and could allow flexibility to adapt to changing conditions and incorporate new information.

- A holistic approach to climate change, recognizing the intrinsic relationship between carbon density in old-growth forests, native diversity, and watershed health and their roles in a healthy ecosystem. The preservation or damage to one of these resources affects another. The changing relationships between people and resources, the effect of climate change on forests and the effect of forest management on climate change lead to a responsibility of the NFS to proactively plan for climate change.
- Climate change concerns cannot be an excuse for analysis paralysis, “do nothing”, or preventing human use of the forests.
- Standards should apply nationwide as well as in checkerboard lands through partnerships (i.e. ecosystems with land being owned or managed by a variety of agencies) and enforced. Since every forest is different, since the body of science around climate change is growing rapidly, and since climate change will impose new challenges (unforeseeable natural and socioeconomic events) to which the NFS must respond quickly, plans must also be flexible enough to allow rapid adaptation. Efficient plan amendment procedures are needed.
- When making plans to mitigate and respond to the effects of climate change, the Rule should encourage collaboration with other agencies including other land-management agencies, landowners and local governments.

- The Rule should create enforceable standards for ecological monitoring and triggers for adaptive management in response to monitoring and study results.
- Plans should emphasize ecosystem services, including carbon sequestration.
- The NFS should consider an impact analysis that would balance the economic and social impacts with biological and ecological impacts. An example may be establishing a carbon budget for each national forest.
- The Rule should set standards to measure and monitor resilience and vulnerability.

### III. Plans could emphasize maintenance and restoration of **watershed health**, and could protect and enhance America's water resources.

- Prioritization of watersheds has to take into account climate change. Water resources can be hit first and worst by climate change, which raises more questions of where to focus and who makes that call.
- The budget appropriation needs to be updated to match the Forest Service current objective which should be watershed health maintenance and restoration, rather than on timber sales.
- Budget is a major problem; the Forest Service should base its budget request on what needs to be done not on timber sales. The budget runs out before the watersheds can be cared for appropriately.
- There needs to be national consistency in establishing watershed health as a planning priority. We should be directing forest plans to build consistency nationwide in watershed priority and a time line for action. The National Forest tends to be the head water of the watersheds, so there is critical importance to the care of the head waters to have the best water, rather than just taking care of the streams.
- Watershed health is the umbrella for all the other categories and should be the focus of the Forest Service. Therefore the primary focus of the Forest Service needs to be adjusted to watershed health in the following ways: The budget should be simplified and watershed based. Planning should be simplified and watershed based.
- The Forest Service should join hands with industry and have a cost-share agreement because of the checkerboard ownership; we do not want a checkerboard plan for the watersheds.
- The new Rule needs to establish watershed health as a priority. Set minimum criteria for what are the priority watersheds with the focus on drinking water.

- The Rule should authorize/empower the Forest Service to reach-out in their plans to all watershed owners where multi-level restorations occur, taking into consideration on a project basis the need to leverage the activities of other land owners with regard to the watersheds on their properties.
- The Rule should reflect the need for ongoing planning to restoring water systems that have degraded.
- The new Rule should require the protection of habitats around water sources. Plans should not simply do the minimum to avoid management jeopardy. The Rule should update the minimum requirements for aquatic quality objectives

#### IV. Plans could provide for the **diversity of species and wildlife habitat.**

- The Rule should enable forest management plans to have robust monitoring and adaptive management strategies.
- The Rule should have species diversity/viability language that mirrors the ESA, rather than creating another level of specificity.
- The Rule should direct plans on how to better identify “at risk” species.
- The Rule should allow for the Forest Service to enter into cooperative agreements with adjacent landowners for wildlife buffers, management and habitat restoration.
- The Rule should allow for the size of an analyzed area to be adapted to meet the needs of the species (measured at all scales).
- The Rule should require that monitoring be conducted based on the best available science.
- The Rule should set a viability performance standard and allow the individual forests to determine how to meet it.
- The Rule needs to reflect the statutory mandate of NFMA (regarding diversity) as follows: [The Forest Service shall] promulgate regulations ... that set out the process for the development and revision of the land management plans.... The regulations shall include .... guidelines for land management plans developed to achieve the goals of the Program which .... (B) provide for diversity of plant and animal communities based on the suitability and capability of the specific land area to meet overall multiple-use objectives, and within the multiple-use objectives of a land management plan adopted pursuant to this section, provide, where appropriate, to the degree practicable, for

steps to be taken to preserve the diversity of tree species similar to that existing in the region controlled by the plan. 16 U.S.C. 1604(g)(3)(B).

#### V. Plans could foster sustainable NFS lands and their **contribution to vibrant rural economies.**

- The Rule needs language about three equal spheres of sustainability: environment, economy and social, with requirements on social and economic analysis as well as environmental. Instead of starting with ecosystem needs, start with all three needs. Past Planning Rules (00 and 05) create one plan alternative, but the 82 Rule requires a broader scope and many alternatives. The new Rule should require a range of alternative plans so the public can understand the alternatives available. Follow with a final management choice that considers ecologic, economic and social factors.
- Plans should clearly show what the need is. The Rule needs to allow plans to be developed based on the needs of the resource and surrounding economies without being constrained by current and expected future budgets. Recent Planning Rules (2005; 2008) have produced draft plans that are constrained to limited budgets and so do not provide a clear picture of the level of treatment that is needed to reverse the decline in forest health and restore ecosystems while sustaining and reviving rural communities.
- The Rule should authorize and require the collaboration of local stakeholders and allow creative authority to local/regional forests to create vibrant local economies. Planning teams need a balance of disciplines and should initiate contact with local governments, request participation, and invite them to bring socio-economic concerns to the table.
- The Rule should authorize and encourage long-term partnerships with common goals, because one year agreements don't work. Partnerships should have at least a 10 year window with rolling agreements.
- The Rule should assign resources in a fair and transparent manner. Grazing rights should be offered at public auction every 10 years.
- Conduct economic impact analyses for local communities for FS programs and projects. Evaluate the impact of plans considering future as well as present resource values.
- Plans should include approaches to help rural communities transition to more resilient communities with a more diverse base (not relying on just one industry). Plans could focus on diverse resources to promote community resilience and dampen the impact of swings in timber markets on local economies.

- The Rule should fully embrace and focus on multiple use, directed for national forests by laws such as MUSYA, NFMA and Organic Act. The Rule should not stray into non-statutory principles that cloud the agency's mission, such as "restoration", "climate change", and "environmental benefits." These will create Achilles heels that attract litigation from those who seek to obstruct active national forest management.
- The planning team must analyze the social and economic impact (historically) on communities created by NFS lands and look at the future needs and how to maintain and enhance the local economy. Do analyses in cooperation with local governments and stakeholders. This should result in optimization of economic outputs of the forest in concert with social and environmental resources the forest offers. Problem comes when one circle takes weight over the other two. Want balance and equal status.
- The Rule should authorize/encourage public/private partnerships with common goals. Long-term partnerships with common goals are needed because one year agreements don't work. At least a 10 year window with rolling agreements will provide long-term profitability. Benefits could be considered more, and this incentive will encourage investment. Restoration is expensive and has long-term maintenance needs.

**New:** Plans could address **recreation** and enjoyment of NFS lands.

It was difficult for those discussing the recreation topic to separate Rule requirements from management plan content, from the planning process, and from implementation steps such as collaboration. Participants saw interactions between these elements and were interested in discussing outcomes desired.

- The Rule should state that recreational use be addressed as a core value guiding the Forest Service planning process.
- The Rule should recognize the role of forests for human health and wellness, particularly in relation to obesity.
- The Rule should include recreation as a guide to ensure more coherent regional and individual forest policies.
- The Rule should address the many different types of recreation and different recreation seasons. Participants wanted to ensure that, even though clear distinctions are made, all types and modes of recreation are considered equally in the Rule and explicitly included in the activities allowed on Forest Service lands.
- The Rule should direct planners at all levels to consider recreational access to NFS lands during all seasons by land, water, and air via motorized and non-motorized users.

- The Rule should address volunteerism as an essential part of recreation and access. Large donations of time are invested in forests by recreational volunteers doing work such as trail maintenance. These people feel a duty to assist on national forest lands and consider it their responsibility as trail users. They feel the Forest Service needs to recognize the efforts of volunteers by promoting volunteerism in the Rule.
- The Rule must direct planners at all levels to consider recreational volunteerism as an integral partner to the maintenance of NFS lands.
- The Forest Service derives large economic benefits from recreation. Some felt that the economic benefits from fees and from staff time saved by volunteers should be quantified as well as the economic contribution to nearby communities.
- Recreational stakeholders want to be actively engaged and included by the Forest Service when making decisions. The Rule should acknowledge the values and needs of all recreation stakeholders by equal and fair consideration and active notification of policy changes.

## Summary of Input for Process Principles

### I. Planning could involve effective and proactive **collaboration with the public.**

- The Rule must require that Forest Supervisors make specified collaboration opportunities available with communities of interest, including public citizens, within a prescribed timeframe prior to developing local management plans.
- The Rule should mandate a structure and define a specific timeframe for collaboration (similar to the timeframe allowed for an appeals process) as an incentive to assure that collaboration happens during the development of individual plans.
- The Rule should require that land management planning includes collaboration with citizen and stakeholder groups in a pre-decisional process, before local management plans are developed; citizens and stakeholder groups should have a role in determining the scope of issues that should be raised in (local) plans, rather than solely having an opportunity to comment on plans after the issues have been determined.
- The Rule should require collaboration with local governments, and elected representatives should be invited to participate in the planning process, consulted “early and often” and afforded cooperating agency status (similar to Section 219.7 of the 1982 Rule, which requires USFS coordination with local governments).



- The Rule should provide sufficient structure to determine the type of administrative review required by individual plans, including how to handle specific objections.
- The Rule should require a collaborative process to strengthen the threshold required before “non-significant amendments” are easily made without structured, transparent review; this collaborative process should require that management plans and amendments are based on ecological need rather than solely on economic opportunity; amendments should be made based on long-term impact rather than immediate solutions.
- The Rule should both recognize and reflect the values of citizens and stakeholders at local and state levels, and the Rule needs to be responsive to current economic, social and environmental factors.
- The Rule should fulfill National Forest Management Act requirements.
- The Rule should make clear that all statutes related to Forest Service management plans will be adhered to and addressed; statutory mandates should not be open for collaboration.
- The Rule should allow for plans to undergo revision in the face of new science, unanticipated ecosystem disturbances, and socioeconomic changes.
- The Rule should identify and consider bioregions over Forest Service regions when writing plans in response to climate change.
- The Rule must recognize that the issues of forest land management do not end at forest boundaries but also have profound effects upon neighboring lands from various environmental, social, political, and economic standpoints.
- The Rule should be easily comprehensible to the layperson and should clearly state how the general public may effectively participate in the drafting, implementation, and amending of new plans.
- The Rule should establish general principles that individual forest plans can be adapted to include.
- The Rule development team should comprise a collaborative and balanced mix of all disciplines, including social sciences and economics. Local governments can provide expertise for these teams.

- The costs of face-to-face collaboration could be reduced by better utilizing online technologies (e.g. blogs and webinars) where appropriate, regardless of participants' geographic locations.

## II. Plans could incorporate an “all lands” approach by considering the relationship between NFS lands and neighboring lands.

- The Rule should incorporate an “all-lands” approach and consider the relationship between NFS holdings and neighboring private lands. For such an approach to be successful, the Rule must mandate the highest level of coordination amongst respective stakeholders.
- The Rule should address what role, if any, the NFS lands should play in a “compensatory role” when neighboring lands do not provide clean water, key habitat, etc. If the Rule includes a compensatory role, it should work both ways (i.e. provide an appropriate share of the wood supply for a region)
- The Rule should require that National Forests are managed to very high environmental standards to mitigate for the degraded condition of non-federal lands. The public wants clean water, biodiversity, carbon storage, recreation, etc. from their forests but these public resources are poorly provided on non-federal lands.
- The Rule should require that National Forests and Grasslands are managed for an extremely high level of resources. Non-public goods like wood products, livestock forage, and minerals are adequately provided on non-federal lands so the National Forest should not emphasize those except as by-products of valid restoration efforts.
- The Rule should require that the Forest Service use an “all lands” approach, i.e. analyzing recreation opportunities on federal, state, and private adjacent lands.

## III. Plans could be based on the latest planning science and principles to achieve the best decisions possible.

- The Rule should require the USFS to meet certain benchmarks and expectations; then allow USFS scientists and peer-review scientists to address how to achieve them.
- The Rule should set a viability performance standard and leave it to the individual forests to determine how to meet it. Outcome-based standards should be developed for each plan based on regional goals that were developed collaboratively. The process in Oregon called Integrated Science Review developed by Governor Kitzhaber is a good model that USFS could use. This provided planners and stakeholders with a credible and common base of knowledge and terminology. Once outcome goals are established,

allow the local and regional planners, stakeholders, NFS scientists and peer review scientists to determine **how** to get there.

- The Rule should require a common science-based, outcome based and legal framework for all management plans at a national and regional level.
- The Rule could encourage the use of university scientists, tribal scientists, or state scientists so they are independent of the USFS. The Rule should state that scientific input is required on a regional basis.
- The Rule should state that the size of an area to be analyzed should be adapted to meet the needs of the species (measured at all scales).
- The Rule should require that monitoring be conducted on the best available science, but specific monitoring protocols should be developed at the forest or regional level.

## Conclusion

Participants remain somewhat skeptical about the likely impact of the collaborative process, but they consistently appreciated the opportunity to be included in it. Many also expressed appreciation for the visible presence of Forest Service leadership at the roundtable discussions in Portland. Participants will be watching the collaborative process closely as the new Planning Rule is developed, and they remain hopeful that their input will be heard and utilized.

Many people expressed high expectations for a new Planning Rule, and the meeting in Portland represents the beginning of a long, complex and potentially invaluable collaborative process that may change the role and future of our national forests and grasslands, as well as build mutually constructive bridges between these national assets and the economic sustainability of nearby communities.

**April 6, 2010 – Portland, OR  
Roundtable Discussions; New Planning Rule  
U.S. Forest Service – Pacific Northwest Region**

This document contains notes from the regional roundtable discussions hosted by the Forest Service in Portland, Oregon. The roundtable notes vary in style due to the unique conversations held at each table. After the roundtable sessions, these notes were posted online and participants were invited to review and clarify them where necessary. This document has been provided to the consultants assisting the rule-writing team for the Forest Service Planning Rule and is the basis for the Regional Summary Report.

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## NOI Substantive Principle One (Table 1): Plans could address the need for restoration and conservation to enhance the resilience of ecosystems to a variety of threats.

Facilitator: Jeremy Grose; Note taker: Matt Phipps

Participant Affiliations: Public/Concerned Citizens, Users/Timber Users/Mining Industry/Hiker, Academic/Science, NGOs/Endangered Species Groups/Environmental Groups/Sustainable Community Group/Environmental Justice Group, County Government, and Sportsmen's NGO.

### A/B. What Works/What Doesn't Work: Key concepts from the current Rule that many would like to see continued or expanded upon:

- A member of Session 1 cited a portion of the 1982 Plan, Section 219.7, which mentions "coordination" of planning efforts (relating to the Natural Resources Advisory Council). This individual believes that the USFS's attempts at coordination at a local level have so far been unsuccessful; however, this section should be included and perhaps expanded upon in the new legislation. This concept was supported by this individual, a lifelong retired worker within the mining industry, as well as by another participant, a member of Sustainable Northwest, and an advocate for rural economic development and conservation issues.
- A member of Session 2 cited a portion of the 1982 regulations (he's not sure which rule) that emphasizes the importance of maintaining viable populations of vertebrate species. He praised the concept of viability, believes it important to continue this concept in a new Rule, but states this regulation must be extended to other native species, including invertebrates. Another member of the roundtable also supported this concept's presence in both current and future legislation; both individuals were affiliated with wildlife or wilderness conservation groups.
- The same member of Session 2 also acknowledged that an important element of the current Rule is the mandatory use of the best science available, and the mandate for agencies to explain why the scientific data they use is the best.

### C. Summary of Input for Plan Content:

- Roundtable participants suggested that the National Planning Rule could begin with a Preamble, not unlike the US Constitution, that outlines 8-12 basic core values that the NFS stands for in the minds and hearts of Americans:
- The Plan could address the notion that Ecosystems are dynamic rather than static entities.
- The Plan could address Time, Balance and Resiliency in terms of Ecosystem processes.
- The Plan could clearly address the responsibilities of accountability and detail in regards to the National, Regional and Forest levels.
- The Plan could recognize the status of certain forest and wilderness ecosystems as Sacred Spaces for groups of users of the NFS, in particular Native Americans.
- The Plan could require Forests to work closely with neighboring land managers to respect natural ecosystem boundaries and take into account ecosystem health across those boundaries (ie; Private lands, Forest to Forest, State to State, Nation to Nation).
- The Plan could direct Forests to establish partnerships with local governments and other government agencies close to NFS lands, and to truly work toward collaborative solutions with these stakeholders.

- The Plan could have provisions requiring Conservation / Protection of inventoried Roadless areas.
- The Plan could require forests to evaluate Restoration projects with equal reward criteria given to Ecosystem Health and Economic returns.

#### **D. Summary of Input for Substantive Topics**

##### *Additions and Comments on Topic #1 (Restoration, Conservation and Resiliency of Ecosystems)*

- The following is an overview of roundtable participant comments regarding Substantive Topic #1, relating to Ecosystem Restoration, Conservation and Resiliency:
- The Plan could acknowledge the important role of Fire in nearly all NFS lands. Further, it could state that the ultimate restoration end-goal on Actively Managed lands is achieving a Pre-European Settlement fire condition.
- The Plan could replace the “Historic range of variability” concept with Ecosystem resiliency as an end goal. (Ties in with Climate Change).
- The Plan could address the need to maintain a Desired Future Condition once attained.
- The Plan could have provisions requiring Forests to establish benchmarks or Desired Future Conditions for Ecosystem health, i.e., minimum population & habitat thresholds, forest health parameters, clean water, etc.
- The Plan could have provisions requiring Forests to seek out Restoration projects in Managed NFS lands before pursuing opportunities in unmanaged, unroaded areas. Wildlife habitat corridors should be conserved wherever they currently exist.
- The Plan could have provisions requiring Conservation / Protection of inventoried Roadless areas.
- The Plan could require forests to evaluate Restoration projects with equal reward criteria given to Ecosystem Health and Economic returns. The value of a Forest’s projects should carry more weight than Volume. do you mean overall value of economic, social, environmental contributions should carry more weight than volume of output such as timber/mineral extraction?
- The Rule should allow flexibility to manage for new or lost unique habitats.
- The Rule should address the hiring of local workers in restoration initiatives.

##### *Establishment of Benchmarks Relating to Ecosystems and Biodiversity of Species*

- All three roundtable sessions, in discussing issues of Conservation and Preservation, gravitated naturally to the concept of an ecosystem benchmark, some standard or historical norm which Conservation and Preservation efforts might use as an objective. Agreement on the necessity of such a benchmark crossed interest group lines and united roundtable participants. Language in the 1982 Plan refers to the preservation of “viable” species of vertebrates; while most participants affiliated with environmental groups agreed that this preservation should be extended to invertebrate animals and plant species, all agreed that talk of viability in the Plan would be meaningless without clear establishment of standards regarding biodiversity, and a definition of what makes a species viable.

- A potential model for such a benchmark, suggested one roundtable participant in the first session, is the set of standards comprising FRCC 1 (Fire Regime Condition Class 1), which would represent a shift back to forest ecosystem conditions around the time of first European contact with indigenous peoples in the Western United States. Two other session participants were familiar with these standards, and supported this idea.
- One issue related to biodiversity was distinguishing between native and non-native (invasive) species of plants and animals. In addition to monitoring post-restoration/post-conservation activity, participants across a spectrum of interest groups acknowledged, inventorying of habitats would probably be necessary to include in the Plan, to use as a foundation for planning future restoration efforts.
- In establishing benchmarks, many participants, particularly those with strong ties to environmental or wilderness conservation organizations, recognized that ecosystems are not static concepts but are constantly evolving. Although some advocated for the return to a “starting point” when the forest maintained a perfect balance of predators and prey, when fires routinely cleared out undergrowth, most participants insisted on accepting that changes would occur over time; that throughout evolutionary history, ecosystems had fallen out of balance, only to have this imbalance corrected by the laws of nature. One participant affiliated with wilderness protection initiatives suggested that, with the growing effects of climate change, resiliency of ecosystems might be a better goal than any defined benchmark. Managing for natural processes, she said, would allow forest ecosystems to move in whatever direction these processes take them. This idea was agreed upon by several other participants in the session.
- Most participants in the first two sessions favored accommodations, in any sort of ecosystem benchmarks, for dramatic changes over relatively short periods of time. Adaptive management, they said, was a priority.
- One concrete element of conservation favored by a majority of roundtable participants in the first session was the protection of old-growth forests. Could an overall Rule state that all old-growth forests are hereby safe from development or exploitation, they wondered.

#### Establishment of Benchmarks Relating to Animal Species

- Conference participants with affiliations to several interest groups mentioned the recent return of wolves to Yellowstone, and the ensuing complications that have arisen. Participants stressed that predator species must be introduced into habitats in a responsible, careful way; that balance in an ecosystem between predator and prey is crucial; and that forest plans should consider how plant species will be affected by the return of large predators to ecosystems. One participant even suggested that enforceable standards for predator/prey ratios might be established in certain ecosystems, although she seemed unsure of how such standards would be enforced.

#### Identification of Chief Threats to Forest Ecosystems that Should be Addressed in Rule

- When participants in all three sessions were asked to list their ideas for the top threats faced by forest ecosystems, they responded with the following:

1. the repercussions of altered fire regimes;
2. fragmentation of habitat;
3. invasive species (plant and animal);
4. the repercussions of past logging processes and grazing processes; and
5. the existence of roads in National Forest areas, which provide access for surreptitious loggers and illegal recreational users who damage ecosystems.

#### Discussion of the Threats Stemming from Fire

- Roundtable participants, particularly those with a background in forestry or in county/state environmental agencies, repeatedly cited the expenses and hazards of fighting fires in wilderness and forest areas. Advisory scales or checklists to help distinguish between sizes and magnitudes of which fires are encouraged to be fought, and which left alone, would be useful, participants said. Another idea was to allow at least those ground fires caused by lightning strikes to run their natural course.
- While some participants stressed that specifics of fire planning guidelines should be managed at the level of individual forest, nearly all participants, regardless of interest group or affiliation, agreed that the Rule could require plans to address the historic role of fire in forest management, and signal an attempt to return the forests to a state in which fires will be smaller, less catastrophic, and able to be left alone to run their natural course.
- A County Commissioner argued that 2007 energy legislation eliminated economic incentives for removing biomass that frequently acts as fuel for forest fires. Longer-term contracts for biomass feedstock are necessary, he said, in order to make mechanical removal of forest vegetation an economically feasible operation. He also argued that the 2007 energy bill should be modified in order to permit the removal of biomass for use in energy plants.
- One participant commented on the fact that a disproportionate number of fires are started by people; in light of the huge costs associated with fighting these fires, he suggested that new limits should be placed on what lands adjacent to national forests may be developed and occupied by humans.

#### Discussion of Issues Relating to Soil Processes

- The participants in the second session stressed, in addition to a return to natural fire processes, a return to natural biotic processes, notably those relating to soil health. One participant with ties to various environmental organizations expounded at length upon the negative effects of clear-cutting, biomass removal, mono-cropping, and the use of pesticides. She stressed that preventing erosion was a key concern that should be addressed in the Plan. Four other participants in this session, all with ties to conservation organizations, agreed.

#### Discussion of the Threat of Roads:

- One roundtable participant present at the second session was particularly concerned by the issue of roads in national forests and wilderness areas. He sees roads as a key threat faced by national forests, because roads contribute to erosion and sedimentation, in addition to



functioning as entrances for off-road vehicle users and invasive species. He suggested that the presence of roads also leaves open the possibility of later timber exploitation, a matter of grave concern. His main point was that ambiguity regarding the current roadless regulations, stemming from legal challenges that arose in response to 2001 legislation of roadless areas, should be cleared up by the new Plan. For this purpose, he said, a separate, stronger set of tools and regulations would be needed.

Issue of Coordinating Local/Regional Authority

- In light of the discussion, in all three sessions, of the need for benchmarks of progress in the new Plan, many participants acknowledged that separate benchmarks should be developed for each particular region; some went so far as to say that benchmarks should be developed for each individual forest. Others, particularly those with hands-on experience in conservation and environmental agencies, suggested the possibility of plans that went beyond forest boundaries, incorporation entire regions or areas. These plans, they said, should allow for changes in and even movement of habitats and ecosystems, as the effects of climate change grow more pronounced.

Issue of Coordination with Local Rural Economies

- Various representatives of rural communities, a participant with ties to the logging industry, and several participants affiliated with environmental and conservation organizations all noted the importance of providing employment alternatives for communities that have suffered economically as a result of increased regulation of the logging industry. Many were excited by the prospect of putting local residents to work on restoration projects, such as road restoration, planting trees, and other types of work.
- A participant representing the interests of the logging industry argued that management practices incorporating timber harvesting were more lucrative, and might therefore finance restoration projects, which in general are funded with taxpayer money. Several participants affiliated with environmental organizations agreed that timber can be a perfectly good byproduct of restoration processes, but that in general timber practices should form only a small part of restoration initiatives. However, they did acknowledge that there has been great progress in recent years in terms of making restoration and industry work together in certain areas. They stressed that timber practices would need to be accompanied by careful monitoring of thresholds, to see how much logging a forest might handle sustainably.
- A resident of a rural community reiterated the importance of hiring local workers in any large-scale restoration or management projects, and that investments should be made in training for local residents (those living within 25 miles of a given forest) in new fields relating to conservation and restoration.
- Several participants believed that restoration and conservation efforts should hold priority over the needs of local communities and economies.

### Concept of Performance Evaluation and Guiding Principles

- Roundtable participants stressed that a monitoring process, to maintain and ensure efforts initiated under a new Plan, must be robust and proactive. In addition to any system of monitoring or evaluation, most participants agreed, precision and clarity are needed in the Plan itself.
- As stated previously, certain members believed that a sort of preamble including a statement of values might be useful in guiding future interpreters of the legislation. Leaving terms up to interpretation, they reasoned, left forests open to potential risks. The idea would be to ensure that sustainability, resiliency, and permanence of the ecosystem are not subjected or subordinated to other values, such as those of recreational users or extractive industry.

### **E. Summary of Input for Process Topics**

#### Use of Latest Science and Principles:

- One member suggested a clause that would insist that scientific principles be given priority and precedence over other arguments presented by community or industry groups, in the process of deciding a course of action in restoration plans.

#### Relationship Between NFS Lands and Neighboring Lands:

- Participants in the first and third session, across lines of interest group affiliation, were passionate in their belief and agreement that restoration and conservation should adhere to natural ecosystem boundaries, not simply political borders or jurisdictions.
- A participant with ties to environmental organizations suggested that the Plan should consider international law, as well as differences and overlaps in policies of states and reservations. In all cases, they argued, notions of coordination and collaboration should subordinate political boundaries.
- One main area related to this issue, as presented by roundtable participants in the first and second sessions, was that of wildlife corridors. Perhaps the push for wildlife corridors could be part of a new, coherent national plan, they argued. In situations in which the presence of absence of a particular endangered species has bearing on future management practices, proponents said, this species should always be given the “benefit of the doubt,” or the possibility of returning in the future, if not at present. Planners should also be open, these participants suggested, to the possibility of the evolution of ecosystems, to the arrival of new species to corridors and habitats.

**NOI Substantive Principle Two (Table 2): Plans could proactively address climate change through monitoring, mitigation and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information.**

Facilitator: Maryka Paquette; Note taker: Christen McCurdy

Participant Affiliations: Public/Concerned Citizens, NGOs/Environmental Policy Groups/Environmental Justice Groups, Retired Forest Service Employee, County Government, Conservation Science and Policy Group, and Environmental Journalist.

The following contains a summary and major points gleaned from the morning and afternoon sessions dealing with NOI Substantive Principle Two, the evening session dealing with a combination of Principles Two, Three, and Six, as well as from individual input submitted.

Stakeholders agreed that the issue of climate change needed to be addressed in a holistic manner. They recognize the intrinsic relationship between carbon density in old-growth forests, native diversity and watershed health as they contribute to a healthy ecosystem. The preservation of one of these resources complements the preservation of another. The stakeholders are cognizant of changing relationships between people and resources, the effect of climate change on forests, and the effect of forest management on climate change. They voiced the need for a shift from valuing Forest Service land as a resource to be extracted, to valuing it as a resource to be sustained in and of itself. All stakeholders present agreed that it is the responsibility of the Forest Service to proactively address climate change, while one individual's submitted input found Forest Service action on climate change issues problematic. He felt it would prolong the process for completing the forest plans by causing "analysis paralysis."

All stakeholders present agreed that the Forest Service must be both firm and flexible in developing a rule to respond to climate change. They found the need to set standards that apply nationwide and are redundant forest-to-forest, as well as in checkerboard lands (i.e. ecosystems with land being owned or managed by a variety of agencies) and that they must be routinely enforced. Since every forest is different, since the body of science around climate change is growing rapidly, and since climate change will also impose new challenges (unforeseeable natural and socioeconomic events) to which the Forest Service must respond quickly, plans must also be flexible enough to allow rapid adaptation. Over the course of three roundtable discussions, stakeholders arrived at several suggestions for building in that firmness and flexibility. Some of the greater themes were monitoring environmental changes; collaboration with other agencies, with the scientific community, and with local governments and members of the public; setting measurable goals and quantifiable values for reducing the impact of climate change; and examining the impact of the Forest Service's own activities on climate change.

#### **IV. Recommendations**

##### **A. What works: key concepts from current Rule that many would like to see continued**

- Quantifiable goals provide strong benchmarks to which the Forest Service can be held accountable.
- Cooperating agency status with counties; this rule was eliminated in February 2009 and several participants strongly voiced the need for this to be reinstated.
- Collaboration with the public on plans.

##### **B. What doesn't work?**

- The previous Forest Service rule doesn't explicitly address climate change.

- Not enough consultation is taking place between USFW and USFS to be proactive and collaborative in climate change planning.
- Process is too slow; process must become more nimble, and plans must be made more flexible in order to adapt to changing issues and science.
- Agency requires but does not emphasize monitoring of environmental damage.

### **C. Summary of Input for Plan Content**

#### **a. Concerns/Problems**

- The Rule should consider socioeconomic issues involved in climate change, i.e. shifting of economic baselines from timber industries to ecosystem services and how these impact to community health, population impact due to seasonal and permanent migration from areas effected by climate volatility.
- Forest Service Plans must be flexible enough to meet the needs of local governments; there is great concern over the loss in revenue from timber sales if the Secure Rural Schools and Communities Self-Determination Act is not reinstated.
- Forest Service Plans must be flexible enough to allow the agency to respond more nimbly to challenges imposed by climate change than in the past.
- Forest Plans should include an approximate “carbon budget” -- use FIA data to estimate the amount of carbon currently stored in the forest and evaluate the impact of alternative management plans on carbon sequestration and emissions.
- The Forest Service’s Regional Climate Change Action Plans may inform Forest Plans.
- Forest Service Plans need redundancy to protect certain types of habitat across all regions.
- Forest Service Plans need to be enforceable and there need to be standards by which the Forest Service can be held accountable.
- The Rule should address climate change by avoiding the need for mitigation in advance.

#### **b. Recommendations**

- The Rule should provide that Plan writing involve local governments when considering the socioeconomic issues involved in climate change; this includes that revenue streams that are generated off of public lands in a new economy need to offset those lost in changing industries to county governments.
- When making Plans to mitigate and respond to the effects of climate change, the Rule should enable collaboration with other agencies including other land-management agencies, landowners and local governments.
- The Rule should differentiate approaches by which the Forest Service should manage research forests versus operational forests.
- The Rule should establish Climate Action Plans that would be more frequently updated.
- The Rule should have nationally consistent standards.
- The Rule should link flexibility to monitored data.
- The Rule should require redundancy in Forest Plans as a measure of stability.
- The Rule should create enforceable standards for ecological monitoring and triggers for adaptive management in response to monitoring and study results.
- The Rule should work proactively and be responsive to whatever climate legislation does get adopted.

## **D. Summary of Input for Substantive Topics:**

### **a. Concerns/Problems**

- The Forest Service should utilize staff at research stations and volunteers to a greater degree to monitor changes in national forests.
- The Forest Service should recognize that intact ecosystems are more resilient and more adaptable to the effects of climate change.
- The Forest Service should recognize the intrinsic relationship between carbon density in old-growth forests, native diversity and watershed health as they contribute to a healthy ecosystem. In addition, that water resources can be hit first and worst by climate change.
- Plans should emphasize ecosystem services, including carbon sequestration.
- The Forest Service must quantify measures beyond timber sales to be included in its Plans, to reduce a fallback on timber volume as the only measurable and therefore only accountable goal.
- In anticipation of climate change, the rule should consider both the historical range of variability and predictions of unprecedented change when crafting new plans.
- The Forest Service should be cognizant of its own agency's contribution to climate change by way of forest practices, recreation and alternative energy investments. The practice of clear cutting is too detrimental to forest health and watershed quality to be considered a harvest practice. The Forest Service should address the balance between carbon sequestration and thinning, in an effort to reduce the effect of major fires.
- The Forest Service should consider an impact analysis that would balance the economic and social impacts with biological and ecological impacts. An example may be establishing a carbon budget for each national forest.
- The Plans should require the right-sizing of the National Forest Road System for the protection of watersheds and ecosystems, and enforcement of Forest Service road rules. Unless it's a permanent road system it should not be in the forest for 10 years.

### **b. Recommendations**

- The Rule should prioritize the need for monitoring; as part and parcel of that, the Rule should prioritize monitoring and research on its own land.
- The Rule should prioritize monitoring of carbon density, native diversity and watershed health, as they contribute to a healthy ecosystem.
- The Rule should set standards to measure and monitor resilience and vulnerability.
- The Rule must set measurable goals for reducing the impact of climate change. The Rule should establish criteria for "carbon preserves" that may be set aside, with quantifiable values for resource preservation, carbon storage and watershed health.
- The Rule should identify and protect intact (roadless areas greater than 1,000 acres) and healthy ecosystems, key watersheds and key species; this includes migration corridors of key species. It should give priority to these resources when considering plans for renewable energy projects and the right-sizing of the National Forest Road System.
- The Rule should identify and prepare an action plan for areas where the effects of climate change are predicted to strike.
- The Rule should set standards for minimizing the impact of Forest Service activities on climate change.
- The Rule should identify opportunities for renewable energy development, while considering emissions and appropriate citing.

## **E. Summary of Input for Process Topics**

### **a. Concerns/Problems**

- The Forest Service should prevent local collaboration from undercutting the national rules and regulations that allow the public to hold the Forest Service accountable for management decisions that occur in forests outside of their immediate locale.
- Plans should be able to undergo revision in the face of new science, unanticipated ecosystem disturbances, and socioeconomic changes.
- Plans needs to look beyond political boundaries and collaborate with other agencies (including other land-use agencies and local governments) in order to respond to climate change in specific bioregions.

### **b. Recommendations**

- The Rule should freely enable collaboration with the public and allow flexibility where applicable ideas having broad public support may be incorporated into plan making.
- The Rule should ensure all plans are based on the best available science.
- The Forest Service should consider and build on other agency research.
- The Rule should identify and consider bioregions over Forest Service regions when writing plans in response to climate change.

### **NOI Substantive Principle Three (Table 3): Plans could emphasize maintenance and restoration of watershed health, and could protect and enhance America's water resources.**

Facilitator: Dottie Dean McMaster; Note taker: Treasa Fuerte-Stone

Participant Affiliations: Public/Concerned Citizens, Retired Forest Service Engineer, NGO/Environmental Groups/Endangered Species Groups, Environmental Policy Groups, Municipal Utility, Dept. of Natural Resources, Private Citizen-lawyer, County Government and State Government

#### **Conclusions/Facilitator's Summary:**

Individuals around the table participated to varying degrees. The points of discussion outlined below had broad agreement with no dissenting voices.

There was strong consensus among all the participants regarding the importance of placing watershed protection, restoration and maintenance or improvements in current water quality conditions at the center of all ecological and economic planning. There was a strong belief that a focus on availability of clean drinking should be the primary directive. Budgets could be structured to facilitate placing water quality preservation as a top planning priority.

Participants expressed broad support for the idea that, in order to insure resilient and healthy watershed conditions are maintained, the Forest Service should take a long range view in planning efforts. Watersheds should be considered (at a drainage level) in planning without regard for ownership boundaries to be efficient and successful. As a matter of course, the development of a collaborative process to achieve consensus among stakeholders will be key; participants agreed that the Rule should strongly encourage Forest Plans to include the development and utilization of collaboration between individuals, municipalities, counties, states, Tribes and federal agencies.

Most agreed that the Rule should encourage and enable state/federal collaboration on plans. There are state-wide plans put together, often with federal funding. However, there does not seem to be current support within the Forest Plans that helps move the State Plan forward. The linkage is currently not there to help close the loop, after the data has been processed, between the analysis and the action.

Participants were universally concerned that the Rule must find a balance between setting specific standards/ directives which would assure all Plans meet a high level of measurable outcomes and the ability to adapt to local conditions. Overall the group was in favor of the Rule requiring the Plan to take into consideration Best Management Practices and current science based factors at all levels. They also assumed that outdated guidelines in the 1982 Rule would be updated to reflect new science gathered over the past 25 years.

#### **RECOMMENDATIONS**

##### **A. What works: key concepts from current Rule that many would like to see continued**

- All land owners are required to correct their water/roads.
- The public input on proposed plans
- An opportunity for the public and outside organizations to include and engage in what the language of the rule and plan means.

## B. What doesn't work?

- The '82 minimum standards- the Aquatic Standards need to be adjusted.
- The current water rules does not line up with what we now know about water today.
- The NEPA regulations need to be changed for the new rule to work.

## C. Summary of Input for Plan Content

### a. Concerns/Problems

#### *Information and Issues*

- Roads heavily impact our water, we need them but they are also very damaging. Problem- there isn't money to restore/maintain the roads. How is it determined which roads need to be maintained and which roads need to be taken out.

#### *Shared Vision*

- How to coordinate projects across boundaries or with multiple landowners? Collaboration between the Forest Service and other land owners that have watersheds on their property needs to happen. Forest Service is in a great position to be proactive and to facilitate land owners on watershed restoration Rule- should have provisions to facilitate it, but not require it.
- Enable State/Federal collaboration on plans- needs to be enabled but not mandated. There are State-wide plans put together, often with federal funding, however, there does not seem to be support within the Federal plan that helps move the State plan forward. The linkage is not there to help close the loop after all the data has been processed between the analysis and the action.
- Nested Planning- project level multi-year planning for the higher level would be a larger area of watersheds. Should rule define how many levels are we going to plan? Are we going to set up the hierarchy-less structure at the higher level- eco based analysis with the lower levels providing more of the impact?
- Symposiums to coordinate watershed needs and consequences of plans are lacking. Plans for watersheds will cut across several areas- National Forest, private, and municipals. The Rule should include a more formal process for collaboration with all owners of land within a watershed.
- The Forest Service should join hands with industry and have a cost share agreement because of the checkerboard ownership; we do not want a checkerboard plan for the watersheds

#### *Standards and Guidelines*

- The plan should not degrade the quality of the water source.
- Some of the projects are so small that they are excluded from the planning process- so it can be dangerous to the quality of water. The Forest Service Rule should apply to all plans, otherwise it is destructive the goal.

#### *Scale*

- The watershed should be the focus of the Forest Service. Of the ecological aspects- the watershed is the canopy. Economics falls under it also due to water supply and habitat preservation.
- Water is the focus of ecological process. Keep the framework for the analysis in the planning rule and use it to incorporate into the planning process at multi-levels more definite actions. Watersheds should be handled as the big picture basis for other plan elements.



## b. Recommendations

- The rule authorize and encourage watershed planning. A watershed area should be the complete drainage of an area- some of it may be private - there will need to coordination with the other owners when it crosses property boundaries.
- The Rule should say that a plan criteria would be that the water source with the highest natural resilience to climate change would be a high priority.
- Focus on area that may be most resilient, but should consider if the true priority is where impact is worst or on the area that is most resilient.
- There should be more specifics on what watershed protection means in the rule so that it is not left up to individual interpretation.

## c. Recommendations with the support of more than one interest group

- The rule needs to establish watershed health as a priority. Set minimum criteria for what are the priority watersheds with the focus on drinking water. Watershed scale should look at what is happening on a large scale. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, American Rivers, Trout Unlimited, NW Ecological Research Institute, Municipal Water & Electric Board Member, National Forest Foundation, Sierra Club, Wash. Dept. of Natural Resources, Pacific Rivers Council, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*
- The rule should require that each plan use the current Best Management Practices as part of their action plan. *Recommended by participants at the table from the following groups: Trout Unlimited, NW Ecological Research Institute, Municipal Water & Electric Board Member, National Forest Foundation, Sierra Club, Wash. Dept. of Natural Resources, Pacific Rivers Council*
- The rule should set and monitor measurable benchmarks to determine progress toward achieving the desired outcomes. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, American Rivers, Trout Unlimited, NW Ecological Research Institute, Municipal Water & Electric Board Member, National Forest Foundation, Sierra Club, Wash. Dept. of Natural Resources, Pacific Rivers Council, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*
- The rule should authorize/empower the Forest Service to reach-out in their plans to all watershed owners where multi-level restorations occur, taking into consideration on a project basis to leverage the activities the other land owners do with regards to the watersheds on their properties. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, Trout Unlimited, NW Ecological Research Institute, Municipal Water & Electric Board Member, National Forest Foundation, Sierra Club, Wash. Dept. of Natural Resources, Pacific Rivers Council, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*
- The rule should require an assessment and schedule of the road system at each National Forest Revision. The rule should address how to determine where the roads should be/where they should go. *Recommended by participants at the table from the following groups: Forest Service*

*Engineer-Retired, Municipal Water & Electric Board Member, National Forest Foundation, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*

- The Rule needs to give flexibility/adaptability and still require adherence to fixed standards in regards to watershed health. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, Municipal Water & Electric Board Member, National Forest Foundation, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*
- The Rule should reflect the need for ongoing planning to restoring water systems that have degraded. *Recommended: Forest Service Engineer-Retired, Municipal Water & Electric Board Member, National Forest Foundation, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*
- Rule should require project planners to include funding for continued maintenance to protect watershed and other affected resources. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, Municipal Water & Electric Board Member, National Forest Foundation, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*

#### **D. Summary of Input for Substantive Topics (NOI Substantive Principle 3 Watershed Health)**

##### **a. Concerns/Problems**

###### *Watershed Approach*

- There needs to be a national consistency in establishing watershed health as a planning priority. We should be directing forest plans so that it builds consistency nationwide in watershed priority and a time line for action.
- National Forests tend to be the head water of the watersheds so there is critical importance to the care of the head waters to have the best water, rather than just taking care of the streams.
- Watershed health is the umbrella for all the other categories and should be the focus of the Forest Service. Therefore the primary focus of the Forest Service needs to be adjusted to watershed health in the following two ways:
  - The budget should be simplified and watershed based.
  - Planning should be simplified and watershed based.
- Primary purpose of the Forest Service should be changed to focus on the watersheds. It is currently focused on timber sales.
- Counties heavily depend on water resources. The Rule should authorize and enable plans to address quality of water and prevention of mud slides caused by forest disturbances.
- Maintain and enhance water quality, the National Forest is that resource for clean water.
- National forests are important to water quality; much of the water originates on the National Forest property

- Future population projected increases will place pressure on forests; we need a healthy water supply and should protect natural filters for water quality that will be needed in the future.

*Watershed Standards, guidance and Best Management Practices (BMP) Below are suggestions and comments from individual roundtable members*

- That there will not be a way to measure if the plan follows the minimum requirement set forth in the rule for watershed health, both maintenance and restoration.
- There is concern that planners may take minimal action required by the rule to take care of watersheds, doing just enough to meet the rule.
- Problem: How can we use the Forest Plan Rule to get us out of the rut of compromised water quality and species list? There should be an obligation to recover species.
- Efficiency in planning could be enhanced by prioritizing watershed planning explicitly in the rule.
- Prioritization of watersheds has to take into account climate warming. This raises more questions of where to focus and who makes that call.
- Concern is present that the Best Management Practices are the ceiling and that will be all that will be done in the plan to meet the watershed requirements. There needs to be assessments to see if management activities are accomplishing the goals. The Washington State Dept of Natural Resources could serve as a model because they have a minimum set of what must be done.
- When considering watershed health maintenance and/or restoration planning-there needs to be a long term focus that looks at the big picture and not just a single area.
- There had been a lot of watershed disturbance via engineering- we can have watershed issues based on what had already been done. We have to allow for watershed restoration

#### **b. Recommendations**

- Prioritize protection of watersheds that are healthy first, next priority is to prevent degradation and to restore.
- Forest Service should educate the private owners about available resources.

#### **c. Recommendations with the support of more than one interest group**

- The Forest Service needs to commit to watershed stewardship and sustaining of watershed health. *Recommended by all participants at the table from the following groups: Forest Service Engineer-Retired, American Rivers, Trout Unlimited, NW Ecological Research Institute, Municipal Water & Electric Board Member, National Forest Foundation, Sierra Club, Wash. Dept. of Natural Resources, Pacific Rivers Council, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*
- A uniform land allocation for important watersheds based on the resource such as major head water would be high priority. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, Trout Unlimited, NW Ecological Research Institute, Municipal Water & Electric Board Member, National Forest Foundation, Sierra Club, Wash. Dept. of Natural Resources, Pacific Rivers Council, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*

- Decide minimum setting of best practices and set priorities- watersheds need to be at the top.
- Prioritize watersheds by those that are more resilient, what we have, then mitigate & restore
- Prioritization may be based on whether it is a restoration of drinking water source. *Recommended by participants at the table from the following groups: Trout Unlimited, NW Ecological Research Institute, Municipal Water & Electric Board Member, National Forest Foundation, Sierra Club, Wash. Dept. of Natural Resources, Pacific Rivers Council*
- The rule should require the protection of habitats around water sources. Plans should not simply do the minimum to avoid management jeopardy. The rule should update the minimum requirements for aquatic quality objectives. The rule should specify how plans would address the aquatic zone. *Recommended by participants at the table from the following groups: Trout Unlimited, NW Ecological Research Institute, Municipal Water & Electric Board Member, National Forest Foundation, Sierra Club, Wash. Dept. of Natural Resources, Pacific Rivers Council*
- The rule should indicate the framework the plans take. The plans should be specific on the analysis done as it relates to watershed health maintenance and restoration. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, Municipal Water & Electric Board Member, National Forest Foundation, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*
- The budget appropriation needs to be updated to match the Forest Service current objective which should be watershed health maintenance and restoration, rather than on timber sales.
- The budget is a major problem- Forest Service should base its budget request on what needs to be done not on Timber Sales. The budget appropriation needs to be updated to match the Forest Service current objective, rather than on timber sales. The timber sales program runs everything-the concern is the budget runs out before the watersheds can be cared for. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, Municipal Water & Electric Board Member, National Forest Foundation, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*
- Budget- is there a restoration/watershed category? Who would oversee it and implement it? There could be restructuring of the department to match the focus on the watershed. *Recommended by participants at the table from the following groups: Forest Service Engineer-Retired, Municipal Water & Electric Board Member, National Forest Foundation, Wild lands CPR, Private Citizen-lawyer, Rural Forest President, Commissioner, Oregon State Employee*

## NOI Substantive Topic Four (Table 4): Plans could provide for the diversity of species and wildlife habitat.

Facilitator: Kim Caringer; Note taker: Kerri Bueneman

Participant Affiliations: Public/Concerned Citizens, Users/Timber User/Wilderness/Horse Riders/Hikers/Neighbor, Academic/Science/Planning/Environmental Science, NGOs/Environmental Groups, Financial Users/Outfitters, NGOs/Endangered Species/Environmental Justice, Academic/Graduate student, State Government and Tribal Government.

Important Issues:

This topic has the most profound impact to forest management; has been a hot button issue.

Diversity/Viability are very linked.

How do we reconcile the differences between habitat diversity and species viability?

Not just adaptive management, but adaptive planning.

### Recommendations:

#### A. What Works

- Viability of the species is extremely important; Forest service needs to be on top of this.
- The viability mechanism to maintain diversity needs to be in the new rule.
- The current rule is very basic in the area of diversity of species and wildlife habitat.
- Topic has the most profound impact to forest management.

#### B. What Doesn't Work

- The current rule needs to have more details about how the diversity of species and wildlife habitat is maintained.

#### C. Input for Plan Content

##### a. Concerns/Problems

- Viability does need to be included in the new rule – Calling it sustainability dilutes the meaning.

##### b. Recommendations:

- The differences between FS and BLM and others approach to land management planning need to be reconciled (understand this may require congressional action).
- Rule should say that the Forest Service should maintain a viable environment as the NFMA requires, not manage specie by specie.

##### c. Recommendations supported by several groups:

- The rule should enable forest management plans to have robust monitoring plans and adaptive management strategies.
- Rule should allow plans to consider/collaborate with state & tribal planning efforts.
- The rule should have species diversity/viability language that mirrors the ESA, rather than creating another level of specificity.
- The rule should direct plans to be science based.
- The rule should direct plans on how to better identify “at risk” species.
- The rule should maintain and restore wildlife populations as well as habitat.

## D. Summary of Input for Substantive Topics

### a. Concerns/Problems

- Without the viability mechanism, the FS will have a hard time doing environmental analysis (An EIS) that is legal.
- Why would you change viability to sustainability?

### b. Recommendations:

- Add plants to the viability protection.
- The rule needs to reflect the statutory mandate of NFMA (Regarding Diversity)
- The rule should recognize tribal treaties for species viability & access.
- Rule should provide for protecting ecosystems.
- Rule should allow for Forest Service to enter into cooperative agreements with adjacent landowners for wildlife buffers, management & habitat restoration.
- Viability should be considered at all levels. - Regional, Forest, Watershed, Project level

### c. Recommendations supported by several groups:

- The size of the area analyzed should be adapted to meet the needs of the species. (measured at all scales).
- The rule should include monitoring be conducted on the best available science, but specifics.
- The rule should set a viability performance standard, and leave it to the individual forests to determine how to meet it.

## E. Process Topics:

- Different agencies should better integrate their planning strategies.
- The rule needs to have general principles that individual forests can adapt to.
- Rule needs to account for cost effective management.
- The rule should clearly define terms such as viability, etc.

## Additional Notes: Morning Session/Table 4

- Viability of the species is extremely important. Forest service needs to be on top of this. Separation and space between domestic sheep and wild sheep is needed to solve the problem of wild sheep dying when the two meet.
- Topic has the most profound impact to forest management.
- 82 Rule was mirrored in 76 law. 82 Rule was not the first, 79 rule was the first put together by congress.
- 79 Rule said that if you lose a specie you lose diversity, save all the species to save all the pieces of each ecosystem.
- Viability mechanism to maintain diversity needs to be in the new plan.
- How should the rule question how viability is handled?
- How is forest service not the only one dealing with viability outside of jurisdiction?
- What direction should give the forest service in handling shared land? - Offer an incentive to the state
- Is there a way of blending "most effective" planning agencies on a national level?
- Have BLM and Forest Service coordinate rules
- Biggest problem is new legislation

- NW Forest Plan takes the viability and applies it to BLM land in Oregon.
- Different agencies should better integrate their planning strategies.
- Protect viability, but shorten the required steps to meet that requirement.
- Without the viability mechanism, the FS will have a hard time doing environmental analysis (An EIS) that is legal.
- We need to protect viability of species and plants not just native and desired non native vertebrates.
- Add plants to the liability protection.
- The size of the area analyzed to be adapted to meet the needs of the species. (measured at all scales)
- The monitoring of habitats should be done on the ground, not on a national level.
- Is there a difference between viability and diversity? Diversity/Viability are very linked.
- Put science forum video on you tube or make it available somehow.
- Monitoring needs to be done in specific forest plans.
- Forest plans should include monitoring.
- The rule should include monitoring be conducted on the best available science, but specifics should be on the plan level.
- The rule should set a viability performance standard, and leave it to the individual forests to determine how to meet it.
- When a specie is designated as sensitive they get special treatment, and they do get extra research to make sure the environment is well protected.
- The differences between FS and BLM and others approach to land management planning need to be reconciled.
- Need more incentives from all land owners to integrated planning.
- Differences between FS, BLM, and other public land owners approach to land management planning needs to be reconciled.

#### **Additional Notes: Afternoon Session/Table 4**

- Habitat connectivity should be included.
- How do we ensure the statewide plans are integrated with the federal plans?
- Rule should ensure plans to consider/collaborate with state & tribal planning efforts.
- (E.G. Oregon Conservation Strategy, Oregon State-Wide Forest Assessment & Resource Strategy, Washington Forest & Fish Agreement)
- Rule should say that the Forest Service should maintain a viable environment, not manage specie by specie.
- The rule needs to reflect the statutory mandate of NFMA (Regarding Diversity) as follows:
  - The Forest Service shall] promulgate regulations...that set out the process for the development and revision of the land management plans.... The regulations shall include.... guidelines for land management plans developed to achieve the goals of the Program which....
  - (B) provide for diversity of plant and animal communities based on the suitability and capability of the specific land area to meet overall multiple-use objectives, and within the multiple-use objectives of a land management plan adopted pursuant to this section, provide, where appropriate, to the degree practicable, for steps to be taken to preserve the diversity of tree species similar to that existing in the region controlled by the plan. 16 U.S.C. 1604(g)(3)(B).

- The rule should recognize tribal treaties for species liability & access.
- The rule should analyze on multiple scales - project, watershed,
- The rule needs to have general principles that individual forests can adapt to.
- Landscape approach - ensure the habitat versus specie by specie.
- How do we reconcile the differences between habitat diversity and species viability?
  - Crux of Issue
- The rule should enable forest management plans to have a robust monitoring plans and adaptive management strategies.
- If you can't monitor what is going on, then you cant do adaptive management.
- You have to figure out a way to do cost effective management so that you can do monitoring.
- Adaptive management is better because things change, things change quicker than the formal plan process.
- Rule should provide for protecting ecosystems.
- Rule should allow for Forest Service to enter in to cooperative agreements with adjacent landowners for wildlife buffers or management & habitat restoration.
- The Rule should have specie diversity/viability language that mirrors the ESA, rather than creating another level of specificity.

#### **Additional Notes: Evening Session/Table 4**

- The rule should clearly defined terms.
- Why would you change viability to sustainability?
- Sustainability is relaxing the viability rule.
- Viability does need to be included in the new rule - Sustainability dilutes the meaning.
- Planning area = a forest
- Viability should be considered at all levels. - Regional, Forest, Watershed, Project level
- Claus in the rule could seriously help protect wildlife.
- Not just adaptive management, but adaptive planning.
- The rule should direct plans on how to better identify "at risk" species according to individual species requirements.
- The rule should maintain and restore managing wildlife populations as well as habitat
- The rule should direct plans to be science based.



## **NOI Substantive Topic Five (Table 5): Plans could foster sustainable NFS lands and their contribution to vibrant rural economies.**

Facilitator: Lois Schwennesen; Note taker: Katie Delaney

Participant Affiliations: Public/Concerned Citizens, Users/Timber Users/Grazing Permit Holders, Academic/Adaptive Management, Sustainable Communities NGOs, County Government, Financial Users/Outfitters, Ecotourism, Users/Ski areas/Off-Road Vehicle/Mountain Bike/Horse Riders/Hikers, Academic/Science/Economics/Planning, Fish & Wildlife Service

The themes from both morning and afternoon sessions revolved around the strong linkage between forest plans and the economic sustainability of the communities nearby. On the positive side, there is good economic support from recreation users, research and monitoring jobs, resource extraction activities, as well as environmental factors such as clean, abundant water and clean air. On the other hand, there are serious public safety costs to adjacent communities when national lands are used for drug related activity, when extreme fire risks are present and forest health from bug infestations affect neighboring timber lands, or local communities must handle increased public safety costs.

The overriding theme, amongst others, is that the Rule should require that forest planners collaborate with nearby communities, landowners, and cabin owners to address specific factors, and authorize the Plans to address additional factors appropriate to each region. The goal is not only to identify how the USDA Forest Service can assist these stakeholders, but to identify how these parties can assist the planning goals of the Forests.

### **Topic 5 Morning Session**

#### **C. Summary of Input for Plan Content**

##### **a. Concerns/Problems**

- Local governments and local stakeholders have not adequately been included in plan development.

##### **b. Recommendations for Plan Content**

- Local governments, as elected representatives, should be invited to participate in the planning process, consulted “early and often” and afforded cooperating agency status.
- Rule should require that forest planners collaborate with nearby communities, landowners, and cabin owners to address a list of specific factors, and authorize the Plans to address additional factors as appropriate to their region.
- Planning rule should address energy policy, focusing on renewable energy. Should be part of management plan.

#### **D. Summary of Input for Substantive Topics:**

##### **a. Concerns/Problems**

- The Forest Service’s current lack of commitment to a serious role in social and economic sustainability, especially in resource dependent communities. (see b.1 below for recommendation)

- Plans should be outcome based rather than prescriptive.
- Plans should clearly show what the need is. The Planning rule needs to allow plans to be developed based on the needs of the resource and surrounding economies without being constrained by current and expected future budgets. Recent planning rules (2005; 2008) have produced draft plans that are constrained to current limited budgets and so do not provide a clear picture of the level of treatment that is needed to reverse the decline in forest health and restore ecosystems while sustaining and reviving rural communities.
- Rule needs to focus only on principles stated in law and not delve into goals and objectives. Planning rules go too deep. Example is climate change and restoration, which aren't in law and get down in the weeds too much.
- Sustainability: Three spheres of sustainability are environment, economy and social, but FS is conflicted about economy and social. These two are not equally weighted with the environment. Rule needs language about 3 equal spheres, with requirements on social and economic analysis as well as environmental. Analysis should be parallel with needs of all three considered. Instead of starting with ecosystem needs, start with all three needs including social and economic.

#### **b. Recommendations**

- The Planning Rule should use the common definition of “sustainability” as having ecological, social and economic components that are co-equal and inter-related.
- The planning rule should authorize and require the collaboration of local stakeholders and allow creative authority to local/regional forests to create vibrant local economies.
- The Forest Service needs to authorize and encourage long-term partnerships with common goals, because one year agreements don't work. Partnerships should have at least a 10 year window with rolling agreements, which will provide long-term profitability. Long-term benefits could be considered more, this incentive will encourage investment. For example, restoration is expensive and has long-term maintenance needs.
- FS Planning Teams need to be composed of a balanced mix of all disciplines including social science and economics. Local governments can provide expertise for these teams.
- Developing the planning rule without respect to income sources so we can go back to Washington and say, “we need X amount to implement plan”. Monies must go back to local forests to fund their programs.
- The Rule should keep a narrow focus on the multiple uses directed for national forests by laws such as MUSYA, NFMA and Organic Act. The Rule should not stray into non-statutory principles that cloud the agency's mission, such as “restoration”, “climate change”, and “environmental benefits.” These will create Achilles heels that attract litigation from those who seek to obstruct active national forest management.
- Fully embrace and promote multiple use in general
- Rule should take local forest products into account. Take timber harvest as stand alone, look at shared receipts
- Challenge local groups and allow creative authority to local/regional forests to create vibrant local economies. FS has authority and responsibility to do this.
- The planning team must analyze the social and economic impact (historically) on communities created by NFS lands and look at the future needs and how to maintain and enhance the local economy. Do analyses in cooperation with local governments and stakeholders. This should result in optimization of economic outputs of the forest in concert with social and environmental resources the forest offers. Problem comes when one circle takes weight over the other two. Want balance and equal status.

- Planning teams need a balance of disciplines and should initiate contact with local governments, request participation, and invite them to bring socio-economic concerns to the table.
- Authorize/encourage public/private partnerships with common goals. Long-term partnerships with common goals are needed because one year agreements don't work. At least a 10 year window with rolling agreements will provide long-term profitability. Benefits could be considered more, this incentive will encourage investment. For example, restoration is expensive and has long-term maintenance needs.
- There are 2 pieces: 1. The forest itself and the relationship to local economy and 2. Help rural communities with transition to more resilient communities with a more diverse base (not relying on just one industry).
- Past planning rules (00 and 05) create one plan alternative, but the 82 rule requires a look at the broader scope and many alternatives. If this was the case the public would know all the options. New rule needs to require the agency to prepare a range of alternative plans so the public can understand the different alternatives available. Follow the statement, with many alternatives, with a final management choice that considers ecological, economic and social factors.

#### **Additional Notes Topic 5 Morning Session:**

- Plans should analyze and present a broad range of reasonable alternatives rather than one pre-selected alternative developed by the agency. Otherwise, how will the public know the trade-offs that are being made?
- The decision-maker (Forest Supervisor or Regional Forester) should be directed to select, as the preferred alternative, the alternative that represents the best balance between ecological, economic and social values
- Accept alternative monitoring for environmental performance
- Broaden scope on upland monitoring. Need scientific data to capture benefits
- Fully incorporate all user groups. Coordinate resource management process with stakeholders and the private sector
- Listen to users: adaptive management: --Healthy forests=healthy communities and vice versa
- Timber-dependent counties depend on the secure rule schools act. Support county jobs and economies with rational and reasonable timber harvest
- Healthy environment and community: look at management and use instead of preservation
- Goal should be to keep resources healthy for multiple use (used climate change as an example)
- Balance between science, management and local economies (reference timber sales law suits). County logging companies going under and affecting local economies.
- Sustaining local rural communities: keep balance; Effect on economic stability should be equally weighted with environmental issues.
- Open to innovative and creative partnerships. These need to be formed to facilitate healthy communities
- Ensure outreach and communication with rural communities, partnership and collaboration
- More specific: rule must authorize and promote specific concepts: long term contracts for a variety of forest products (ex. Biomass)
- Must be partners, more than just receipts
- Embrace cooperative agency status for counties, counties bring socio-economic piece to that table. Needs to be part of rule.
- Resource Advisory committees are a good source of collaboration; provide on-the-ground connection

- Planning constrained by expected budget. Look at resource needs. FS needs the freedom to express what forest really need without having to consider budget.
- Bullets of #5 handout “all wrong”. Strays into realm of stating ecological benefits. Strays from statutory direction that doesn’t prioritize economics. For example, the environmental benefits are in a laundry list but the economic benefits are considered a by-product.
- Instead of saying plans “could”, rule should say plans “shall”.
- Basic, on-the-ground problem is that there is no long-term partnership. Can’t get long enough agreements. Permits are not long enough. Ex: can’t develop water, fencing, logging, etc.
- Commitment of government and length of relationship is the problem on the ground
- Partnerships should be outcome based rather than really prescriptive, should have a rolling option. Simple roll over option to encourage local investments. Sustains local resources.
- Flexibility in land uses depends on weather, etc. Local flexibility is needed.
- Economic vitality should be #1 rule. Different acts and rules have “shut down” economy. Without that consideration, everything suffers eventually. Doesn’t agree with balance of 3 spheres, believes that people must be able to work and jobs should be #1 consideration. Needs dedicated resource for jobs/industry. Uses fires and “let it burn” as an example.
- Overlap is to weight 3 spheres of sustainability equally because they all rely on each other. Example” Harvest = \$ to keep roads in shape.
- Planning rule should allow local communities to determine outcome-based plans that may include local job opportunities.
- Question: Does Rule provide guidance about logging plans/methods --> gets at plan content. Restoration projects can provide jobs if they can pay for themselves but they don’t want to wait for congress. This is more applicable to the plans not the planning rule.
- Rule should direct local staffs to work with local stakeholders.
- Manage the whole landscape together.
- Timber and fishing in SE Alaska have similar issues.
- Problem we’re faced with is that the mechanism by which the FS is funded is outside the scope of the planning rule.
- Develop the planning rule without respect to income sources so we can go back to Washington and say, “we need X amount to implement plan”.
- Stewardship partnerships should be an option
- Management decisions are often about the FS. Should say: “the rule is written, now pay for it”.
- Quotes 1994 FS article in architecture for change, Interim report of the FS reinvention team.
- Social measurement/monitoring: FS should measure impact on local economies
- Local governments can bring in this analysis. Forests need to look at this analysis to consider the three spheres equally.
- Don’t say “maintain” economy but say “resilient” or “sustainable” economy.
- Basis for plan decisions should be the best balance of the economy, economic and social concerns with collaboration of local stakeholders. Important to consider local services that benefit the forests. The FS is reliant on these services for vibrant economies.

## Topic 5 Afternoon Session

### b. Recommendations

- The planning rule should require that forest plans analyze specific economic impacts, to include:
  - a. A standard methodology for economic impact analyses for healthy forests. Affect of plan on value of adjacent lands
  - b. Affect of plan on local jobs
  - c. Affect of plan on long range economic stability of local communities
  - d. Fair and equal access to public resources.
  - e. The value of various outputs should be considered not only at their value today but how this will change over time, particularly as resources become more scarce.
  - f. Economic stability in local communities and include contingency plans for the ups and downs of certain industries (e.g. Timber), recognizing that products don't necessarily hold equal weight in terms of support to the greater economy.

## D. Summary of Input for Substantive Topic:

### a. Concerns/Problems

- Cabin owners have not been included in decision making on the land surrounding their cabins
- Think about effects on neighboring land owners and equally consider all stakeholders

### b. Recommendations

- Conduct economic impact analyses for local communities for all FS programs and projects.
- Evaluate the impact of plans considering future as well as present resources, recreation, and ecosystem services values.
- Plans shall include contingency plans which focus on diverse resources to promote community resilience and dampen the impact of swings in timber markets on local economies.
- Assignment of resources shall be done in a fair and transparent manner. Grazing rights should be offered at public auction every 10 years.
- The planning rule should consider studies that show recreation as a vital part of local rural economies.

## Additional Notes Topic 5 Afternoon Session:

- Cabin owners should also only be subject to reasonable fees and fees shouldn't be changed without notice or reason communicated to the cabin owner. The economic impact on cabin owners should be considered.
- Cabin owners and owners of property neighboring federal lands can offer valuable help in managing resources such as roads and water. These neighbors should be invited to participate in planning.
- The government shouldn't have control over neighboring property and should think of the effects on neighboring property when making management decisions.
- Grazing permits should not always go to the same people. Propose that every 10 years a public auction is held for grazing rights to public land.
- The Planning Rule should be written so that one aggressive stakeholder's opinion isn't valued over other stakeholders.

## Additional Topic (Table 9): Plans could address recreation and enjoyment of NFS lands.

Facilitator: Terry Cornelius; Note taker: Kelly Kay

Participant Affiliations: Public/Concerned Citizens, Users/ATV/Recreational Aviation/Backcountry Horsemen/Wilderness/Snowmobile/Hikers/Mountain Bikers/Equestrian/Canoers/Kayakers/Bird Watchers/Hunters and Anglers/Off-road Vehicles/Cyclists, NGOs/Environmental Ethics, and Ecotourism.

### Morning Session/Table 9

#### Conclusions/Facilitator's Summary

There were several conclusions drawn from the first session of the recreation roundtable. The first and most prominent is that it is imperative that recreation be included in the Planning Rule. Large numbers of participants came out for the discussion out of fear that recreation interests would not be considered in the planning process. It is necessary to include recreation in the Rule to ensure more coherent regional and individual forest policies can use the Rule as a guide. There are many different types of recreation, and it is important that all are included. Inclusion of all seasons in the Rule was also a priority for participants.

There was a particularly strong presence from groups that engage in motorized recreation. They expressed a strong concern that, in the wording for the Rule, a distinction be made in which motorized recreation is explicitly included in the activities allowed on Forest Service lands. Some of these motorists, snowmobile users in particular, also expressed a concern over loss of trails.

The last major point that was discussed was the large donations of time by recreational volunteers. A number of the groups who were represented in the discussion engaged in volunteer trail maintenance. These groups wanted to make it clear that they felt that it was their duty to assist on national forest lands and that considered it their responsibility as trail users. Additionally, they wanted to make it clear that they believe that volunteerism is an essential part of recreation and access.

#### Recommendations

##### A. What works: key concepts from current Rule that many would like to see continued

- Representative from Recreational Aviation Foundation was happy with the fact that public airstrips were not being closed and that the Forest Service was, presumably, allowing volunteers to maintain these spaces instead.
- This is not directly from the Rule, but most of the participants were happy with the fact that the Forest Service regularly holds discussions with user groups and would be happy with further collaboration. This does not happen in all forests, but the participants wished that it could.

##### B. What doesn't work

- There was a general concern for the fact that the Rule exists—many participants expressed that they'd prefer a more regional approach.
- Additionally, participants were upset about the fact that recreation was not initially planned as a topic of conversation and was excluded from the notice of intent.

## C. Summary of Input for Plan Content

### a. Concerns/Problems

- There is some friction between the role that the Forest Service plays and the role that the participants felt that it should play. Many people mentioned that they believe the Forest Service should act as more than a land management agency.
- On a similar note, participants wished the Forest Service would be more transparent and more “user friendly” with recreation groups.
- There is a big difference between motorized and non-motorized recreation activities.
- Several groups expressed frustration that they are not informed of decisions made by the Forest Service that directly affect them or the user groups they are part of.

### b. Recommendations

- Mechanisms for conflict resolution should be included in the rule.
- Many recreation groups donate large numbers of volunteer hours each year. The Forest Service should recognize the importance of volunteerism in the Rule. This was, most particularly, a concern of the Backcountry Horsemen—an organization known for their dedication to recreational volunteerism. The following statement was agreed upon by horse groups, “The new Planning Rule must direct planners at all levels to consider recreational volunteerism as an integral partner to the maintenance of NFS lands.”
- The Rule should include a requirement that some sort of education or signage be provided on Forest Service lands. More specifically, certain participants agreed that it is important to make recreationists aware of any specific rules or concerns at a property.

### c. Recommendations with support of more than one interest group

- When planning for recreation, it is important to plan for different types of recreation. We talked a lot of about particular phrasing for the Planning Rule, and we ended up with something that addressed most peoples’ concerns: “the new Planning Rule must direct planners at all levels to consider recreational access by land, water, and air to NFS lands by motorized and non-motorized users during all seasons.”
- It is absolutely necessary that recreation is mentioned in the Rule. The statements about recreation made in the Rule must capture the consensus of recreation groups in order to ensure recreation is approached appropriately in strategic and regional planning.
- Recreation should mean access.

### Additional Notes:

-Recreation was left out of the NOI

- Trails are groomed by volunteer snowmobilers. Of all of the user groups, concern is over the number of volunteer hours they contribute yearly to the Forest Service. Groups would like ‘volunteerism’ as a term included in the Rule.

-If the rule is too complicated or too detailed, it can neither be successful nor practical

-A successful rule will be collaborative, supported by the public, and broad (Terry)

-The rule is an enabler: it should compel the lawmakers to consider recreation

-thus, recommendations must be broad enough to get planners to include recreation interests in their planning

- Forest Service sees themselves as a land management agency—but the public views them as a group that administers the forest for recreation. There is a disconnect between the public’s understanding of the role of the FS and its user friendliness. Forest Service needs to be more “user friendly”.
- Over the years, Forest Service does not provide the same “bang for the buck.”
- Recreation is managed under a separate federal act.
- When we plan for recreation, we need to plan for different types of recreation (motorized and non-motorized, also, summer/winter)
- Some groups feel that there are biases against their specific types of recreation
- From the National Roundtable (a statement made by the Blue Ribbon Coalition): “The new planning rule must direct planners at all levels to consider recreational access by land, water, and air to NFS lands” during all seasons (added by the group).
- Certain individuals are concerned about the fact that this wording may exclude motorized vehicles
- We would like mechanisms for dealing with conflicts on trails, etc.
- Conflict resolution must be included in the rule
- When things happen in the forest, recreationists feel like they are the last to find out
- Marlene is concerned about consistency throughout the United States in recreation rules
- Getting recreation considered in the Rule is a stepping stone for having recreation included in other rules
- “When we think of a planning rule for recreation, it has to be so universal that anyone, anywhere could translate the meaning to their region”
- Out of concern for a lack of funding, it is also important that we make it clear that recreation also means volunteerism and access
- We should consider the fact that the rule we are crafting is going to have an effect for a number of years
- Motorized and non-motorized recreation need to be specifically mentioned in the statement above
- The Rule must consider the large time and money contributions to Forest Service lands made by volunteer groups and user groups
- The Rule should include elements of education (signage, etc.) to ensure that recreationists are informed of specific rules and information that come with individual plans
- Users appreciate the fact that the Forest Service hosts collaborative meetings with multiple user groups to discuss specific regional needs and issues -And, users would like to see this happen in all forests
- The Rule must consider recreational volunteerism, it should be counted on by the Forest Service
- “The new planning Rule must direct planners at all levels to consider recreational volunteerism as an integral partner to the maintenance of NFS lands”
- “The Forest Service’s Planning Rule must provide guidance to forests for achieving the recreation priorities included in the agency’s service-wide strategic plan” -Thus, without some mention of recreation in the Plan, there is nothing acting as guidance for recreation planning regionally and in the strategic plan.

Things we are currently happy with:

- Forest service is not closing existing public airstrips and allows for volunteers to maintain them instead, just opened the first public air field in 45 years in Montana because of volunteerism.

Things we are not happy with:

- Is there any way in the rule that the local forests and local people can have more say in planning in general?



## Afternoon Session/Table 9

### Conclusions/Facilitator's Summary

There are seven main points that the facilitator discussed during wrap up. Each point captured one of the main talking points of our discussion:

- The Rule should state that recreational use be addressed as a core value of the Forest Service planning process.
- Recreation often surpasses timber production in economic value generated by forests.
- Recreation touches more people than most other forest uses—the Forest Service needs to analyze the quantitative and qualitative value of recreation on Forest Service lands.
- The Rule should designate comprehensive landscape-scale trails and travel management planning.
- The Rule should state that with active outreach, the public should be informed about and involved in any plan to decrease or change recreation opportunities—for example the closing of trails, roads, and waterways.
- The Rule needs to recognize that motorized recreation demand is exceeding recreation opportunities on Forest Service land.
- The Forest Service should use an “all lands” approach, i.e. analyzing recreation opportunities on federal, state, and private adjacent lands.

### Recommendations

#### A. What works: key concepts from current Rule that many would like to see continued

- Recreation absolutely needs to be considered in the Planning Rule.

#### B. What doesn't work

There are inconsistencies between the 1982 Rule and regional policies in Oregon and Washington forests. The recreation portion of the current Rule was read to the group and most of the participants were surprised by the gaps between Rule and reality.

#### C. Summary of Input for Plan Content

##### b. Recommendations

Many people were concerned about the Forest Service undervaluing recreation, and some stakeholders felt that it could be helpful to have an inventory analysis done of recreational opportunities nationally.

While there are clear economic benefits derived from recreation, it is also priceless. Recreation is, by far, one of the biggest ways that people are able to engage with national lands.

Some groups were concerned with the strategic classifications of trails. This was mainly happening on a regional level, but participants felt it important that Rule potentially consider trail classes. Vehicle class types were also of concern to certain participant groups. Some participants were concerned that the Forest Service was not adequately recording the number of people involved in off-road, four wheel drive vehicle recreation. These individuals recommended that the Forest Service count four-wheel drive vehicles more accurately to ensure they are allotted the correct number of trail miles.

### c. Recommendations with support of more than one interest group

- There was a strong current of concern for the fact that the economic benefits of recreation are not being considered. Participants felt that recreation could potentially be providing even more revenue than timber, but it is not being considered at nearly the same level. It was stated that, since recreation is one of the last sources of income for the Forest Service, it is necessary to make it a primary consideration.
- Planning needs to happen in collaboration with user groups. More so, participants wanted to see the Forest Service engage in active outreach when planning decisions are being made.
- Many people felt concerned about the fact that trails and roads often disappear without notice and are not replaced. This can be dangerous or confusing, so users want to be ensured that they are kept informed on these types of decisions. Additionally, participants want to ensure that there is no net loss of trails and roads. Some participants mentioned that when there are not sufficient trails to meet demand, illegal trails are created by users.
- Participants felt that an “all-lands” approach with a geospatial context was necessary. User groups do not see the same boundaries as the Forest Service, BLM, etc. and wish that these organizations could collaborate more often. On the same note, when collaboration is occurring, it should also mean that every piece of land does not have to meet every single type of recreationist’s needs. A regional balance should be able to be struck by considering needs and lands on a landscape scale.

#### Additional Notes:

- National Forest planning rule absolutely needs to address recreation (all agree)
- There are inconsistencies between the 1982 rule and regional policies
- Recreation may eclipse the other benefits that come from National Forests and is underplayed in the former planning Rule
  - Randy is suggesting that recreation is key to planning, not a derivative of another value
- Randy D: recreation is one of the only sources of income left for the Forest Service
- Ethan notes: in another sense, you can’t put a price on the benefits received from recreation in our national forests
- “No other resource, service, or product derived from the forest service lands touches the lives of more Americans nor has greater opportunity to foster citizen support than does the opportunity to choose from a variety of recreation settings as necessary to enjoy a quality recreation experience”
- It may be helpful to have an inventory analysis to determine what recreation opportunities are available in every forest
  - Oftentimes, certain categories of recreation are left out
- The wording of the Rule needs to capture a positive philosophy for recreation to ensure that our goals are captured to benefit future generations
- Ethan: There has not been enough value placed on recreation by the Forest Service
- Forest Service needs to do a more effective job of connecting with user groups. They may not be aware of the information that user groups can provide.
- Collaborative FS and user group meetings are appreciated but have not been universally successful due to varied interpretation of the Rule on a forest-by-forest basis
- Twig meetings (between Forest Service and user groups) are worked out “around the table, not out on the trail”
  - It’s more beneficial for user groups to meet one another out in the forest
- Planning is not integrative, plans for different types of groups should be made together (roads and trails need to happen at the same time)

- BLM may be able to offer an example for this
- Forest Service needs to consider the fact that if they need to close trails for environmental or other reasons, they need to create another trail elsewhere—no net trail/road mileage loss
  - User groups should be consulted when trails/roads are moved or closed
  - Trails are closed without new trails being created—users want no net trail loss
- There may be commonalities between various recreation groups, there are also conflicts
- Regions are very different, so it is necessary to come to a general consensus on language for the Rule
- The public needs to be informed and at the table on the local planning level
- Read generalized statement from Session 1, people were generally happy with the concerns addressed, particularly the distinction between uses and the mention of all seasons
- Class 1 is a vehicle that is less than 850 lbs, 50 inches wide, with four or three wheels (usually ATVs and quads, motorcycles)
- Class 2 is everyone else entering the Forest in a four wheel vehicle
- One concern is that Class 2 recreationists are not being counted by the Forest Service accurately
- Since miles of trail for use are determined by this type of user analysis, Class 2 user miles may not be being calculated accurately (Randy D.)
- It is difficult for recreationists of all types to access the water, hiking trails, etc. using the roads designated for Class 2 vehicles
- Concerned about the strategic assignment of trail and road classes
- Marlene: it is important for everyone at the table to remain in the conversation throughout the entire planning process
- If we can first generalize on recreation, we can later get specific on certain places, uses, and regions
- Forest Service conversations and working groups need to involve the local public
- Recreational groups need to know that planning that is not near their homes is happening and that they can become involved
- There are a number of passes and fees required for recreation and this is unacceptable to some members at the table
- For recreation, you have to have the supply equal the demand
- Quiet recreation means that less enforcement is necessary on Forest Service lands (?)
- Decreasing the number of trails often leads to the creation of illegal trails, if supply meets the demand for trails, this could be prevented
- Forest Service may need to take an “all lands” approach in order to look broadly at all public forest lands so that a given national forest doesn’t have to be everything to everybody
  - Recreationists don’t see the same forest service land boundaries that foresters do
  - Needs to consider a geospatial context
- Adequate active outreach is necessary for the Forest Service to inform sufficient people of changes and conversations that are occurring
- Motorized recreation needs are exceeding supply—23% of Americans are technically interested in OHV recreation
- Recreation should span across adjacent lands
- Addressing seasonality takes hunters and winter recreationists into consideration in a way that the group appreciates

## **Evening Session/Table 9**

### **Conclusions/Facilitator’s Summary**

Many of the same needs and concerns from the first two roundtables were echoed in this discussion. Two of the big topics that had already come up involved volunteerism and economics. Stakeholders at the table felt that the Forest Service needed to recognize the efforts of volunteers by mentioning

volunteerism in the Planning Rule. Additionally, those interested in volunteerism also wanted to see the Forest Service promoting volunteerism not only in the Rule, but also by allowing more people to get out onto Forest Service lands to volunteer.

The recurrence of the topic of economic benefits primarily centered around the fact that the Forest Service is able to derive large economic benefits from recreation. Some participants felt that the economic benefits (both from fees and from staff time saved by recreational volunteers) should be quantified in some way.

Participants were largely concerned with definitions and equality. Many people wanted to make sure that clear definitional distinctions were made between different modes of recreation in the Rule. Additionally, participants wanted to ensure that, even though clear distinctions are made, all types of recreation are considered equally in the Rule.

Lastly, the biggest theme discussed at the table was that of active inclusion. Recreational stakeholders want to see the Forest Service engage with and include them when making decisions. Together, the table decided that **“the Planning Rule should acknowledge the values and needs of all recreation stakeholders by equal and fair consideration and active notification of policy changes.”**

## Recommendations

### A. What works: key concepts from current Rule that many would like to see continued

- The participants agreed that they like when the Forest Service sits down with stakeholders, genuinely listens to them, and takes their needs and recommendations into account. They felt that in order to draft successful recreation plans, the Forest Service needs to genuinely listen to all stakeholders before making choices.

### B. What doesn't work

- Most of the participants in the discussion agreed that shutting people out of decision-making has not worked well in the past.

### C. Summary of Input for Plan Content

#### b. Recommendations

- Some participants were concerned about the fact that the Forest Service may be underestimating the economic benefits of recreation. They recommended that the Forest Service find a good way of quantifying the economic benefits of recreation.
- Similarly, others felt that the Forest Service should recognize the monetary value of the volunteer time that many service groups put in on Forest Service lands.
- Due to a number of specific groups' current status in Forest Service rule, it was agreed upon by some participants that the Rule may should make clear distinctions between different types of recreational uses.
- One stakeholder group felt that the Forest Service should consider more strongly the needs of people with disabilities.

#### a. Recommendations with support of more than one interest group

- The table agreed that the Rule needs to promote active communication and bring all stakeholders “to the table” in decision-making.
- Our table spent a lot of time crafting specific wording to try and capture the concerns and needs of all stakeholders at the table. The phrasing that was chosen and reported was **“The Planning Rule should acknowledge the values and needs of all recreation stakeholders by equal and fair consideration and active notification of policy changes.”**
- Many participants wanted the Forest Service to recognize the value of volunteerism for US Forest Service lands and perhaps allow for more volunteer work to be done.
- Most of the participants agreed that, due to the changing nature of recreation, the Rule should consider all types of recreation equally.
- One of the last points made, that most of the table seemed to agree was the fact that “recreation is a use of multiple use”. As I understood it, this meant that recreation users are using the forests for many different things, and also are contributing in many different ways.

#### **b. Recommendations**

- Time is an important concern. Ecosystem processes are much slower than a single human lifespan. The Rule should make longer term planning a priority.
- Due to their relationship with one another, water and climate change should be considered together in the Rule.

#### **c. Recommendations with the support of more than one interest group**

- Rulemaking should be based on sound science

#### **Additional Notes:**

- “Forest trails would probably fall apart without the volunteer work that IMBA, the Backcountry Horsemen, and other organizations provide”
- “There are 500,000 people who hunt in the state of Oregon—rural communities need hunters”
- What has worked is when the FS has staff that listens to all sides
- When I sit in front of staff that listens to me and we can collaborate, that works. What doesn’t work is when we shut people out of the decision-making process.
- Somehow, active communication needs to be part of the Rule
  - Getting the stakeholders to the table is crucial
- Travel management plan—“a lot of times they pretend to listen, but don’t genuinely listen. We spent lots of time having discussions and in the end, all the Travel Management Plans in Oregon turned out to be exactly the same”
- Without everybody, everything we do is going to fail. We have to all work together.
- In discussing the Travel Plan, we have to move above our local concern and be able to speak on a higher level about our concerns
- On the flipside, do we want to see more other than just getting the terms we think are important included in the plan?
- In our current litigious society, its often difficult to offer volunteer services at the Federal level
- We require a better way of quantifying the value of recreation on our forests and also need a way to capture the volunteer impact on our national forests
- What is the best way to do this? How do we ensure that volunteerism is valued as highly as it should be and become recognized?
- Terry: reminded everyone about some of the conclusions we came up with in Roundtable 2

- “My values and needs have weight”—all of our needs should be involved in the planning process
- But, things also have to come out balanced as far as thought process and actual plan
  - Brian prioritizes the phrase “equal and fair” consideration
  - Other than being listened to, public needs to be notified
  - Capture recreation stakeholders specifically
- The Planning Rule should acknowledge the values and needs of all recreation stakeholders by equal and fair consideration and active notification of policy changes.*
- The word recreation was completely left out of the original Notice of Intent. By the volume of people that have come to the table, we have made a statement about the value of recreation interest
- One of the things we need is a place for each of the stakeholders present at the metaphorical table
- “It seems to me like the national forest could do the same advisory group process as the Tillamook forest”
- At the district level, it is possible for recreation groups to develop relationships to ensure they are included. Can we do this at a national level?
  - This is not universally true in all districts
  - This also requires an awareness of groups’ schedules, funding cycles, and other things that make it difficult to begin relationships
- Recreation provides serious economic impacts for the areas
- Terry: went through what we discussed in other sessions
- Bike group desires a clear distinction between bikes and other mechanized vehicle uses
- Bicycles are considered a non-mechanized use and the term isn’t used because it’s confusing
- If we’re going to refer to a type of use for bikes, it’s important to use clear definitions
- The Planning rule should make an effort to clearly classify different modes of recreational use
- All recreational interests should be considered equally
- “Recreation is a use of multiple use”
- Forest Service should consider the inclusion of those with disabilities

#### Final Report statements:

1. We believe in the value of the inclusion of all recreational stakeholders. As a result, the Planning Rule should acknowledge the values and needs of all recreation stakeholders by equal and fair consideration and active notification of policy changes.
2. Volunteers provide an important contribution to the Forest Service. It is important that the Rule recognize the value of volunteerism by recreation service groups to the Forest Service. Because of their ability to contribute so much to the forest, the Forest Service should encourage and accommodate more volunteers and volunteer projects.
3. The Planning Rule should make an effort to clearly classify different modes of recreational use. At the same time, the table agreed that in clearly defining differences, the Planning Rule should also consider all recreational interests equally.
4. The group agreed that “recreation is a use of multiple use.”

#### Additional Recreation Group:

- Need to consider the role of forests for human health and wellness, particularly in relation to obesity
- Plans should address higher goals like access and should limit artificial distinctions between uses (bikes v. motorcycle, non-profit v. for profit)
- Every time the rules of access are changed, the ability of people to access the forest is decreased

#### Other Groups (substantive):

- Importance of preserving what we have utilizing the best available science

- Confusion about roadless areas currently
- Plan should examine in the context of time realistic human management and ecosystem processes
- The rule should take economic concerns into account, but timber harvest should not be the primary concern. We should also do what we can to support the local economies.

(all process):

- rulemaking should occur based on sound science
- climate change and water are very intertwined, perhaps these two issues should be considered together
- Rule should define critical watersheds and set goals for them

(substantive):

- viability should be included
- The Rule should be science based

### **Session Three Topic 9, Recreation** [Evening Session, second table]

Facilitator: Craig Larsen; Note taker: William Francis

Participant Affiliations: Public/Concerned Citizens, Users/Timber Users/Grazing Permit Holders/Off-road vehicle/Hiker/Wilderness/Neighbor/ White-Water Rafting, Planning, Adaptive Management, Global Climate Change, NGOs/Environmental Groups, Fish & Wildlife Service, State Government, Rancher, County Government, Tribal Government

- The rule should recognize that every barrier to public access results in a less diverse demographic of visitors to NFS lands (currently, 97% of visitors to NFS lands identify as Caucasian).
- The rule should recognize that as forest lands are rendered inaccessible due to the lack of maintenance of existing trails and roads we necessarily concentrate a rising number of visitors within a decreasing area of land, thus leading to greater environmental degradation.
- The rule should demand more consistency across related intergovernmental entities (i.e. National Park Service, NFS, and the BLM), and should seek to establish a more simplified set of rules in regards to recreational activity upon public lands (i.e. A single “all-uses” permit was suggested).
- The plan must acknowledge the public demand for recreation throughout the four seasons, taking into account the seasonal use of any given NFS land holding.
- The plan should consider human beings and their need to recreate in the outdoors as a functioning part of a given ecosystem, and that these needs should be represented proportionally through the adequate funding and planning of recreational opportunities on NFS lands.
- The plan should seek to redefine the terms and conditions of “recreation” and “recreational use” based upon solid environmental and social science of today (i.e. several bicycle advocates expressed the concern that the current plan does not adequately recognize cycling as a recreational opportunity within NFS lands, and furthermore that the environmental impact of cycling needs be considered when deciding where to allow bicycle use).

## NOI Process Principle One (Table 6): Planning could involve effective and proactive collaboration with the public.

Facilitator: Rebecca; Note taker: Sue Ellen Dolan

Participant Affiliations: Public/Concerned Citizens, Users/Timber Users/Mining, NGOs/Environmental Groups, County Governments, Liaison/Lobbyist.

### Summary of Participant Recommendations for inclusion in the new Planning Rule:

- The Planning Rule must require that Forest Supervisors make specified collaboration opportunities available with communities of interest, including public citizens, within a prescribed timeframe prior to developing local Forest Plans.\*
- The Planning Rule should define a specific timeframe for collaboration (similar to the timeframe allowed for an appeals process) as an incentive to assure that collaboration happens during the development of individual Forest Plans.\*
- The Planning Rule should require that land management planning include collaboration with citizen and stakeholder groups in a pre-decisional process, before local Forest Plans are developed; citizens and stakeholder groups should have a role in determining the scope of issues that should be raised in (local) Forest Plans, rather than solely having an opportunity to comment on plans after the issues have been determined.\*
- The Planning Rule should mandate a structure and timeframe for the collaborative process (similar to the Resource Advisory Committee [RAC] model).\*
- The Planning Rule should mandate a structure and timeframe for the collaborative process (not a “politically enforced” process like the RAC mode but a more complex consensus-building model).\*
- The Planning Rule should consider outcome-based collaboration requirements.
- The Planning Rule should define and include experienced facilitation (of public input) as a requirement for collaboration; small roundtable settings are better than large group discussions for exploring complexity of issues and allowing personal input; proactive public awareness efforts should be part of the collaborative process.
- The Planning Rule should identify and define what constitutes a stakeholder group as well as providing “equal opportunities” for public input to have equivalent value in the planning process.
- The Planning Rule should require collaboration with local governments in developing Forest Plans; the Forest Service should be more inclusive to cooperating agency input in developing Forest Plans.
- Section 219.7 of the 1982 Planning Rule, which requires USFS coordination with local government, should be included in the new rule and should be a mandatory part of the process.
- The Planning Rule should fulfill the requirements of the National Forest Management Act.\*
- The Planning Rule should make clear that all statutes related to Forest Service management plans will be adhered to and addressed; statutory mandates should not be open for collaboration.\*
- The Planning Rule should require a collaborative process to strengthen the threshold required before “non-significant amendments” are easily made without structured, transparent review; this collaborative process should require that Forest Plans and amendments are based on ecological need and changes on the ground rather than on economic opportunity; amendments should be made based on long-term impact rather than immediate solutions.

\* Recommendations with the support of more than one interest group.



## **Additional Notes: Morning Session/Table 6**

### **A/B. What Works/What Doesn't Work (with the current plan):**

- Mining industry example- mandatory statutes are non-discretionary, but experience shows that detail is needed to clarify/simplify the rules, and mandated rules should be stated as such.
- The national planning rule needs to make clear that all statutes related to FS management plans will be adhered to and addressed. (A suggestion as to where some of those statutes are: multiple use, sustained yield, mining)
- The 1982 Planning Rule (Section 219.7) which requires USFS coordination with local government should be included in the new rule, and should be a mandatory part of the process.

### **C. Summary of Input for Plan Content**

#### **a/b. Concerns or Problems/Recommendations:**

- 1976 Act underpinnings (Nat'l Forest Mgmt Act) are not being focused on; "Suggest that the first objective is to write a planning rule that fulfills the requirements of the National Forest Management Act."

#### **c. Recommendations w/support of more than one interest group:**

- What kind of administrative review should be required – how to handle specific objections; appeals slow down the process; the planning process should be sufficient to deal with objections.
- How to deal with those who don't seek collaboration? Successful collaboration process (like Resource Advisory Committee) is simple; with incentive to drive the process
- How can a process be put in place that allows the public to have input that doesn't give rise to appeals? Land management planning should involve effective and pro-active collaboration with the public in a pre-decisional process.
- Collaboration should be held before the planning and the projects begin, not after.
- Collaboration process should proceed efficiently & quickly; collaboration not usually quick, but how long is enough? Why not put a time limit on the process? The Planning Rule should mandate a structure and timeframe for the collaborative process. (like RAC model).
- Sometimes collaboration is not required or necessary.
- How to determine the stakeholders for each situation?
- "What if you told Forest Supervisor you must make collaboration available, make a legitimate effort to include all relevant communities of interest and within a certain time frame? If Forest Supervisor has a mandate, she or he will be required to build a record that they have attempted to create a collaborative group, and it will hold up to litigation."
- The planning rule must require, at the Forest Supervisor level, a collaborative process with the public is in place during forest planning that allows for input from communities of interest, in a prescribed time frame.

## Additional Notes: Afternoon Session/Table 6

### C. Summary of Input for Plan Content

#### b. Recommendations:

- Concern with length of process; a specific timeframe is critical in the planning stage. (more than one interest group suggests)
- “The ability to implement non-significant forest plan amendments is a problem, there need to be stronger or more restrictive rules to allow that process to go forward; there needs to be a greater threshold for when non-significant amendments are made. Forest Plan amendments should be based on ecological need and changes on the ground rather than on economic opportunity. Quick and easy amendments are not productive. The effect of the amendment should consider long term impact as one of the factors”
- “Also the level of scientific uncertainty should be considered as a factor.”
- Experienced facilitation (of public input) is a key element; small roundtable settings are better than large group discussions for exploring complexity of issues and allowing personal input.
- RAC – FS relationship explanation- RAC \$ towards enhancing federal lands; 15 member body; environmental/social/economic = functional collaboration within a certain time frame;
- Very few appeals to project outcomes because of the RAC process; another example of different type of collaboration: Timber, Fish & Wildlife consensus group, each solving the other’s problem; no press or legal interruption – outcome: consensus or veto
- “Look to the people who have the best sense of the subject, FS should be more welcoming to the cooperating agency status”

#### c. Recommendations w/support of more than one interest group:

- Public involvement should be defined in the Planning Rule at the citizen level as well.
- Who selects the participants at the table? What defines public?
- Planning Rule should define what determines the stakeholders.
- Planning rule principles should include development of a plan which includes a more proactive public awareness effort to invite citizens at large and stakeholder groups to be invited to the table; should identify and decide as a group what the priorities are (input should include an element which allows the public to determine what issues need to be addressed) where participants initially identify the scope & goals and define collaboration by desired outcomes (early collaboration on the Forest Plan)
- Public should be encouraged, empowered to be involved, input of average citizens should carry equal weight as special interest groups & government agencies.
- The Planning Rule should provide elements for the public to have equal value in the planning process in an outcome based collaboration.

NOTE: Additional individual input (from morning session participant) follows:

“I sat at table six; we discussed the "effective and proactive collaboration with the public." Please accept these comments as part of the substantive comments received for this planning rule, which is expected to be finalized in November of 2011.

I brought with me six items that need to be part of this new rule; however, based on the limiting factor of table subjects and personal time constraints of having one-way, 6 hour drive time. I was only

able to explain two of the most important items that I brought with me; to be sure this new rule will not overlook my fields of interest, mining and local government, I send these comments. I was assured that further comments can be made, for three days, to the same email address that the RSVP was sent for this discussion, which was in Portland, Oregon: [ForestServiceMtg@LSAResults.com](mailto:ForestServiceMtg@LSAResults.com)

### **Statutory mandates not open for public collaboration**

My first comment at the table was that collaboration with the public must be understood to not include collaboration for non-discretionary decision making by the Forest Service, especially when it pertains to certain mining. Statutory requirements do not have discretionary decisions because those requirements are mandates by Congress. Collaboration can be held concerning those decisions where the Forest Service has discretion.

Although there are non-discretionary decisions for other things than just mining, it is important that mining be mentioned with any other items that can be included to this list, because the locatable category, at least, has been current in the statutes since 1865, and the length of history for this activity deserves its mention to avoid any confusion over the non-discretionary nature of this type of mining category.

Notes were made that the rule should include statutory requirements that will be adhered to. My concern is that it will also include, "and not open for collaboration with the public, when developing Forest Plans;" or that, "Forest Plans will adhere to statutory requirements concerning mineral development..." The National Materials and Minerals Policy, Research and Development Act of 1980 restates the need to implement the Mineral Policy Act of 1970 stating: "The Congress declares that it is the continuing policy of the Federal Government in the national interest to foster and encourage private enterprise in (1) the development of economically sound and stable domestic mining..." (30 USC 21 (a)).

### **Coordination with local governments**

The second item of concern is this new rule should require coordination with local governments, as the 1982 Rule incorporated it as stated in Section 219.7 and Section 219.14. In the National Forest Management Act (NFMA), Congress directed the US Forest Service to "coordinate" its land and resource management plans "with the land and resource management planning processes of State and local governments..." The National Environmental Policy Act (NEPA) presents similar understandings; therefore, because of the statutory requirements involved, this rule should mention that Forest Plans will adhere to the coordination requirements of the NFMA.

### **RS 2477 right-of ways**

The third item is that the rule should require the Forest Service to determine the potential for historic right of ways known as RS 2477 in any forest plans and projects. It was stated in the Federal Register for the Travel Management Rule, FR December 9, 2008 Vol. 73 No. 237 (pages 74689-74703), on page 74694: "The Forest Service may, however, make a non-binding administrative determination (NBD) as to the potential validity of an R.S. 2477 right-of-way claim for land use planning and management purposes. If the Forest Service identifies a potentially valid R.S. 2477 right-of-way claim through the NBD process, the agency will encourage the claimant to accept jurisdiction pursuant to an easement granted by the U.S. Department of Transportation (23 U.S.C. 317) or by the Forest Service under Section 2 of the National Forest Roads and Trails Act (FRTA) (16 U.S.C. 533) or to adjudicate the claim pursuant to the Quiet Title Act (28 U.S.C. 2409a).

In making designations for motor vehicle use, the responsible official must recognize valid existing rights (see 36 CFR 212.55(d)). FSM 7703.3 provides an administrative framework for meeting this requirement by providing guidance on documenting jurisdiction, transferring jurisdiction, and exercising jurisdiction over forest roads, based on factors such as the right of individuals and local public road authorities to own, operate, maintain, and use these roads. There is no need to repeat this guidance in FSM 7715.75 (recoded from FSM 7715.65 in the proposed directives)."

While I agree that there is no need to repeat any guidance, however, **to help keep clarity and potential problems to a minimum this new rule should allow any forest plans to have NBD to identify potential valid RS 2477 right-of-ways, as roads, trails, ditches, etc., for management purposes as one of the levels to address in the forest plans.** The Forest Districts involved in writing forest plans must also understand that "regulation" of RS 2477 right-of ways are not allowed as stated in 43 USC 932, "...no regulation of any agency of the Federal Government pertaining to the recognition, management, or validity of a right-of-way pursuant to Revised Statutes 2477..." as these fall within State law or local jurisdictions.

#### **Mineral Development**

The next three items would probably have been best introduced at table 5: Plans could foster sustainable NFS lands and their contribution to vibrant rural economies.

The new rule should state that, mining operations that are required to have a plan of operations (Plan) are not required to be grouped in the NEPA analysis with other mining operations. Each mine will submit a plan at different times and should not have to wait for any other; any analysis required including cumulative effects can be used to supplement and make it easier for other submitted Plans in the watershed; only changing or adding for anything that is different. A case in point is that the Wallowa Whitman National Forest wrote an analysis for the North Fork Burnt River Watershed EIS finalized in 2004. An environmental organization sued, 2005, and now multiple Plans and operations, about 49 of them, are still waiting to go to work six years later as the supplemental analysis is expected in the FR by February of 2011. Each mine must stand on its own merit. Any analysis information can be used to supplement any required for a nearby operation that might be expected.

Also, readdressing the Categorical Exclusion, which may take new statutory support, could be expanded to develop a CE for small mining operations that will not likely impact items on the NEPA list for extraordinary circumstances and allow the small mining operation under this special CE to operate beyond the one year time frame.

Another point that needs attention is any Plans based on non-discretionary decisions for mining will be processed as next in line before any discretionary plans or projects that are current, but have not been started yet. Certain mining projects have statutory authorization rather than agency discretion; those mines seeking Plan approval or review should not be placed last; while the agencies have a choice or discretion to work on certain plans and projects.

Finally, if there is a State Bond Pool available the Rule should recognize it as a viable means to bond those mining operations that need a bond should the operator wish to use it. Mineral development is a necessary component to the economy of our Nation. These suggestions will help to simplify, clarify, shorten planning and help ensure on the ground projects are encouraged and eliminate analysis paralysis that currently seems to prevail in the private enterprise of development of economically sound and stable domestic mining."

## **NOI Process Principle Two (Table 7): Plans could incorporate an “all lands” approach by considering the relationship between NFS lands and neighboring lands.**

Facilitator: Craig Larsen; Note taker: William Francis

Participant Affiliations: Public/Concerned Citizens, Users/Timber Users/Grazing Permit Holders/Off-road vehicle/Hiker/Wilderness/Neighbor/ White-Water Rafting, Planning, Adaptive Management, Global Climate Change, NGOs/Environmental Groups, Fish & Wildlife Service, State Government, Rancher, County Government, Tribal Government

### **Conclusions/Summary**

The Rule should incorporate an “all-lands” approach and consider the relationship between NFS holdings and neighboring private lands. For such an approach to be successful, the Rule must mandate the highest level of coordination amongst respective stakeholders.

### **Recommendations from Session One: Topic 7, “All-lands” Approach**

- The rule must recognize that the issues of forestland management do not end at forest boundaries, but have profound effects upon neighboring lands from various environmental, social, political, and economic standpoints.
- The rule should both recognize and reflect the values of stakeholders at the local and state level, and the rule needs to be responsive to current local economic, social, and environmental factors.
- The rule should facilitate efficient and effective communication and collaboration between federal and state organizations. The rule should put to use all relevant information gathered by those organizations invested in a particular ecosystem.
- The rule ought to be comprehensible to the layperson, and should clearly state how the general public may effectively participate in the drafting, implementation, and amending of the new plan.

### **Recommendations from Session Two: Topic 7, “All-lands” Approach**

- The rule must respect the work of existing collaborations by incorporating the aims and interests of stakeholders and communities as they relate to specific local issues.
- The rule should recognize the obligation of government-to-government relationships. In particular, the rule must recognize the responsibilities of the federal government to protect and preserve the ecosystems and natural resources integral to tribal identity.
- The rule must aspire to the highest level of coordination in order to be truly successful.
- The rule should provide a means by which specific local issues and concerns may be prioritized.
- The rule should address what role, if any, the NFS lands should play in a “compensatory role” when neighboring lands do not provide clean water, key habitat, etc. If the Rule includes a compensatory role, it should work both ways (i.e. provide an appropriate share of the wood supply for a region)
- National Forests should be managed to very high environmental standards to mitigate for the degraded condition of non-federal lands. The public wants clean water, biodiversity, carbon storage, recreation, etc. from their forests but these public goods are poorly provided on non-federal lands. The National Forest should be managed for high levels of these goods. Non-public goods like wood products, livestock forage, and minerals are adequately provided on non-federal lands so the National Forest should not emphasize those except as by-products of valid restoration efforts.
- The rule must support the resilience of local habitats so that they may exist in perpetuity. Adaptation should be considered only as a last recourse.
- The rule ought to foster local employment opportunities that contribute to the current and future health of ecosystems and that are representative of the clean energy movement.

## **NOI Process Principle Three (Table 8): Plans could be based on the latest planning science and principles to achieve the best decisions possible.**

Facilitator: Michael Carlson; Note taker: Jessica Tyner

Participant Affiliations: Concerned citizens, Users/Timber Users/Wilderness, Adaptive Management, NGOs/Endangered Species/Sustainable Communities, County Government, Academic/Science, NGOs/Environmental Groups.

### **Morning Session/Table 8**

#### **Conclusions/Facilitator's Summary:**

Our group discussed “science in planning”. They discussed how the planning process could be improved and how science based decisions should be specified in the planning rule. We also asked how collaboration can best occur within that framework?

We had agreement among a broad based group of interests from a timber company, a sustainable community and environmental NGO, a county government representative, a lawyer and a wild berry user. We agreed the current rule is a cumbersome and frustrating process to be involved in so we looked at solutions and how the process could be more efficient and cost effective for all. The rule should require a common science-based/ outcome based and legal framework for all Forest plans at a national and regional level Outcome-based standards should be developed for each Forest Plan based on regional goals that were developed collaboratively. The process in Oregon called Integrated Science Review developed by Governor Kitzhaber is a good model that USFS should use. We recommend community collaboration to develop goals on a Regional level and then feed those back to a local level to develop each forest plan. Of course, local collaboration is key to building support for each Plan. The Forest Plans should have interim measures/metrics/benchmarks that are outcome based every 5 years on a 20-30 year plan time frame as opposed to every 10-15 years as it is now. This would hold USFS accountable with adaptive management along the way to meet those goals and specific outcomes. The other issue discussed was the importance of incorporating scientific and community input both a regional scale as well as at the local watershed level where good collaboration is already happening.

### **Recommendations**

#### **B. What Doesn't Work**

Process is cumbersome, inefficient, contradictory, not easy to access, time consuming in its current state. From the conservation group of fisherman, they feel marginalized and that the planning process doesn't get to their comments and concerns as much as they'd like to. The process is so unwieldy it's difficult to really be heard. The United States Forest Services (USFS) could identify different groups to sit down and churn through it in lieu of debating the issues – just listening. There isn't a real collaborative effort where you really just listen to people/groups. It feels like there's already a goal in mind and process overwhelms participation of stakeholders.

#### **C. Summary of Input for Plan Content**

##### **a. Concerns/Problems**

There needs to be a plan that lasts a long while so there isn't a constant change to the Plan. If we can figure out a way to do outcome based goals and make them manageable with monitoring, you can really extend the life of a plan.

Decisions can sometimes be based on existing data without a mirror to be able to see changes, evolution, etc. in science and knowledge. Sometimes risks are assumed that are in the deciding stakeholders control.

#### **b. Recommendations**

- If you start with a basis of good solid science and a legal framework, everyone has access to it including the USFS and affected stakeholders. Use best science with outcome based goals with mechanisms to adapt and monitor to make a plan last decades.
- Develop a series of interim measures towards an end-goal or target. E.g. “within x years, there will be x amount of salmon returning”
- Take an ecological landscape look at Forest Plans.
- Include info. from state plans like the Oregon Conservation Strategy.
- There need to be performance standards incorporated at a forest level (outcome based) and specific quantifiable questions asked.
- There should be a diverse array of forest plans, but the base principles and framework should be the same.
- The rule needs to address the process by which stakeholders are brought together.
- The way it works now, each forest has its own plan. We should look for common needs and goals over a larger ecological area especially with neighboring Forest Plans or similar eco-regions.

#### **c. Recommendations with the support of more than one interest group**

All table participants agreed with the following:

- The planning content should create a goal where plans get defined to be adaptive and long-term. Outcome-based with “performance standards.” The rule should provide a framework that define the goals you’re going to measure.
- Plans need to be processed in a way that includes everyone – citizens, local government, everyone has to be involved. Be very careful to manage people’s expectations. This collaboration could be done first at a regional level, then similar for each Forest Plan.
- To be efficient and conduct landscape level conservation, there should be a larger framework at a regional level, like the NW Forest plan with larger ecological and regional goals that each Forest must address in their own plan that will meet those larger targets or goals.

### **E. Summary of Input for Process Topics**

#### **a. Concerns/Problems**

- What’s wrong with the 2005/08 plans that were thrown out? They “processed” the public and weren’t following their own rules.

- Use “outcome based process” to manage forests in the most productive way possible based on science.
- National rules are being used at local levels (i.e. National rules are used for Mt. Hood). You can’t apply something in Savannah to something in Oregon.

#### **b. Recommendations**

- Oregon's Governor John Kitzhaber promoted and successfully implemented “Integrated Scientific Review”. This provided all planners and stakeholders with a credible and common base of knowledge and terminology. This scientific base and a legal analysis should provide the framework or side-boards for all USFS forest plans and planning. Each policy discussion should be informed with sound legal advice up front and available in every facet of the process.
- When you say “science based” it’s not something that can change – science is science. We don’t need to go through the planning process again just because the ideology of the person in charge or the administration has changed.
- Structure-based management is naïve. Obligations could be put on USFS to meet certain benchmarks and expectations; then we should let the USFS scientists and peer review scientists with expertise address HOW to get there.
- To make the process more efficient, set a planning scale at the regional level to come up with outcome based targets and goals. The each Forest would evaluate: “based on the resources we have, we’re going to meet these targets by doing this” OR “we’re not going to meet these targets because we are unique for these reasons.” This will provide accountability and is goal-oriented and can be monitored.
- Frustration comes from the fact that each of the forest plans are a huge process and nothing seems to be done regionally. Forests all have their own plans. Collaboration needs to start on a broader level – at a regional level and then regions can inform the national level. It’s too cumbersome to attend all of the Forest plan meetings and it loses continuity.
- From a process standpoint, it would be good to look at issues on a national regional; and local level and take it down to each unique forest. Then incorporate state and local plans look for synergy.
- Goals and outcomes need to be measurable and quantifiable.
- Look at issues on an appropriate scale.
- Issues, values, concerns, goals, policy make sense regionally. Measurable outcomes should be developed locally at each Forest with stakeholders because there is more investment, knowledge, and interest locally.
- Careful, our national forests should not be “owned” by the local communities around them. If we defer to local communities to make decisions about the national forest, our national forests will



not be owned by the nation. All Americans that have an interest in a specific forest should be able to participate.

- It's difficult to make goals over such a broad place such as a national forest – local communities should be a PART of the process but not all of it.
- It needs to be not about the old agendas but look at ideas in a new light.
- On a regional level, bring together different interest groups to do a collaborative process locally then bring to a slightly larger (regional) scale meeting. Have everyone work through the different goals developed locally to develop goals regionally.

### **c. Recommendations with the support of more than one interest group**

- The planning rule and each Plan should take into consideration the best legal analysis available. You need to know how close you are to complying with the laws. It keeps everyone in a framework without constraining them.
- Accountability needs to be a priority.

## **Afternoon Session/Table 8**

### **Conclusions/Facilitator's Summary**

Our table had a lively discussion behind the science behind decision-making and how they can use the best science available. One of the keys they talked about was better collaboration between independent scientists and planners in the USFS. The example pointed to was in 2 months the NW forest plan convened scientists around the country and it was done really well. The support of the President helped. One thing they wanted to rule to talk about was collaboration and identify a non-degradation of water/soil quality standards. There was a lot of talk around how that may be practical and doable. Identify local metrics to reach those standards. Multiple use should/could still happen where it had the least impact on water/soil quality. There should be recognition of restoration to improve conditions. Another reference was made to the time frame of planning of service. Longer than 15 years was an important planning period recognizing climate change is going to take longer than a 15 year time period. EIS needs to recognize these changes and have benchmarks along this continuum. Plans could be based on the latest planning science and principles to achieve the best decisions possible.

### **Recommendations**

Key Points:

- Collaboration of independent scientists
- Route density standard
- Degradation of soil/water
- Impacting climate change
- Longer than 15 years for the Plan

## **C. Summary of Input for Plan Content**

### **a. Concerns/Problems**

- Previously, science has been stuck in the research side of the agency. Interested in seeing a planning rule that will require the forest service scientists and land managers/planners to work together better than they have in the past.
- What Congress did with the NFMA was to appoint scientists to inform the planning agency in 1982. When it was revised in 2000, there was another community of scientists working with the United States Forest Service (USFS) to ensure science was integrated. Now there's no committee of scientists for this forum but it's not codified in rule to go outside the agency for scientific input. The committee of scientists was previously intentionally independent of the USFS.
- Eastern Washington plan started all the way back in 2002. The concept of doing multiple forests together in a single planning process is not sure if it's good or not.
- NFMA requires plans to be revised every 15 years. There's a need for more quickly update-able plans and ways to address climate change. New research and modeling brings new information.
- A route density standard (all roads/trails/etc.) should be in place. Before adding new trails, you should close roads to keep it balanced and ebbing down the impact on soil/water declination. It will be an avenue of restoration planning.
- Mining and grazing are other activities that degrade the soil/water. Monitor water quality in grazing routes.

#### **b. Recommendations**

- The rule could encourage the utilization of university scientists, tribal scientists, or state scientists so they are independent of the USFS. Tribes have beefed up their science staff.
- There has to be a way to streamline the planning process. Giving deadlines, the planning rule could not so much specify deadlines but that there will be deadlines. If FEMAT (discussed below) can do it in a year, other plans can be done in a year.
- Develop a framework so everyone can understand what type of input is needed for each forest plan. This framework can really speed up a process.
- Climate change plan is inside an action plan and should be updated more regularly due to the fluid and ongoing understanding of climate change.
- People's desires, needs, and wants change often and radically – people on the USFS change, economics change. Possibly have revisions in the planning rule to have them done less frequently (longer than 15 years).
- There are probably some things that could be looked at for restoration lands that would have a longer time frame than 15 years (i.e. restore compacted areas of the forest, fire restoration). How often do we have to thin/burn again to restore the forest?
- Planning rule might require, from a scientific standpoint, for the restoration objectives to consider the timeframes beyond 15 years for achieving the restoration objectives.

- Need to set scientific objectives and base it on a timeline where they will be met along the way and taking the long-term into consideration.
- Measuring outcomes by water quality should be included in the planning rule. Identify water quality parameters at each watershed perhaps. In some cases just measuring water quality may not be enough, however.
- Something should be written into the planning rule that the national forest cannot provide what everyone wants. Although it's implied in the restoration focus that it's been degraded and the shift needs to go to a restorative approach.
- Multiple use is a thing of the past, focus is now on restoration. Multiple use can be justified as long as it's not negatively impacting viability.
- Precautionary "do no harm" principle, land-ethical approach should be considered.

### **c. Recommendations with the support of more than one interest group**

- The Planning Rule should say scientific input is required on a regional basis.
- Realize nothing will be restored in 15 years, look beyond that. Evaluate different management strategies. At the same time, there will be things done shorter than 15 years, such as the knowledge on certain issues (climate change).
- If the plan will be restorative focused, the rule should promote restoration (active and passive) but also have a protective sideboard on wildlife/plants while not degrading soil/water.

## **D. Summary of Input for Substantive Topics**

### **a. Concerns/Problems**

- Ensure the planning rule forms a basis for plans to provide for no degradation of soil and/or water quality and equally provide enhancement and preservation of those.
- National forests are being required to provide all things to all people and they can't, especially to the levels they did in the past. The bottom line in planning has to be does it degrade basic soil and water? If everything comes back to this question of "does it enhance or degrade soil/water quality?" that should be the framework for each plan.
- There's a perception that collaboration means, "If I help out, I get what I want to" which isn't correct.
- Regarding the climate issue, we need to be able to incorporate the science that is emerging. Climate is an issue that we're just starting out with dealing with in forest planning. Would like to discuss science in the ability with forest plans to include monitoring and research.

- Incorporate research findings about a lot of unanswered questions about climate change and how different kinds of forest management effects it.
- The importance of involving scientists in policy work and advocacy/conservation policy work needs to be based on scientific information.

#### **b. Recommendations**

- We need adaptability to update the plans for climate change specifically.
- Something in the planning rule should include maintaining viability of plant and animal species. There should be a mandate for each forest plan to address the issues of soil/water protection and provide those as the foundation in which you build the rest of the plan.

#### **c. Recommendations with the support of more than one interest group**

- ESA needs to include soil/water protection. Standards and monitoring need to be in place for non-degradation of soil/water.

### **E. Summary of Input for Process Topics**

#### **a. Concerns/Problems**

- You don't want to encumber the individual forest planning process by specific requirements to meet with certain people; rather you need to ensure there is input from scientists both inside and outside the USFS.

#### **b. Recommendations**

- It's incumbent that the USFS bring the scientists into the planning process. Perhaps the best way to do this is to take better advantage of the research branch.
- Accrue independent scientists for input, but unsure of best way to do that (universities?).
- NW Forestry (Northwest Forest Plan) was a successful collaboration between USFS and scientists. The FEMAT (forest eco management team) is a good example, though an elaborate scientific partnership – although they did finish their project in one year. This plan covered 18 national forests. However, this did not come under the planning rule.
- Planning needs to be done by forest and adjacent forests should share their planning. There is no need to regionalize it through the planning rule.
- They are trying to plan clusters of national forests right now. It could allow for eco-based planning.
- Doing multiple forests plan together would aid in the science-based efforts since science teams would be shared and not stretched thin providing synergy.

- Sierra Nevada National Forest was a linkage of national forests that also had a successful USFS/science partnership with independent scientific involvement.
- Incur cost savings by implementing webinars. Encourage the possibility of participation regardless of remoteness of participants.
- Right now each national forest plan is signed by the National Forester. Perhaps each plan has to be approved by Regional Forester and the Director of the Forest Service Research Station.
- Planning rule should lay out the process, the steps, the guidelines, but also have an overarching mission/approach that would address issues like “do no harm”, land ethics, restoring lands and resources where they’ve been overused/misused as a way to inform the planners.

**c. Recommendations with the support of more than one interest group**

- If a process could be built into the plan where updates were possible every 5 years or so, 15 years is conceivable for updating the plan. A shorter forest plan turnover makes no sense.
- An EIS has a range of alternatives, and the alternatives may have different timeframes. In terms of the EIS analysis, the timescale for restoration should be factored into the analysis and consider beyond 15 years. Consider outcomes for restoration of water/soil quality.
- The planning process needs to be adaptable to include research and monitoring.

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Portland, Oregon

Individual Participation/Input

NAME/AFFILIATION (Optional): BOB KAY RECREATIONAL AVIATION FOUNDATION (RAAF)  
Email Address (Optional): RKAY@CSGCMEDIA.COM

Please share your input on the new Planning Rule process.

THE NEW PLANNING RULE MUST  
DIRECT PLANNERS AT ALL LEVELS TO ~~CONSIDER~~  
CONSIDER ~~UNMOTORIZED~~ <sup>OFF-ROAD</sup> ACCESS BY  
LAND, WATER, AND AIR.

THE NEW PLANNING RULE MUST DIRECT  
PLANNERS AT ALL LEVELS TO CONSIDER  
RECREATIONAL VOLUNTEERISM AS AN ~~EXTRINSIC~~  
PARALLEL TO THE MAINTENANCE OF UFS LANDS

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Portland, Oregon

Individual Participation/Input

NAME/AFFILIATION

(Optional): Carolyn Evans, volunteer, BARK

Email Address (Optional): Carolynann.evans@gmail.com

Please share your input on the new Planning Rule process.

I spend much of my free time in our National Forests lands.

Here are my concerns and recommendations for future management of our public lands.

My primary <sup>activity</sup> ~~engagement~~ on public lands is quiet recreation in the form of hiking, backpacking, and camping. I want the Forest Service to:

- protect wilderness quality lands from logging, road building, utility corridors + other damaging human activities, recommend these lands for protection as wilderness to Congress

- remove roads inside high quality quiet recreation areas or areas with that potential

- preserve habitat for native flora + fauna free from human activities other than quiet recreation

- remove roads + restore damaged areas to create better habitat for native species
- manage for overall species diversity + health
- analyse management activities in the larger context of their watershed to see cumulative impacts on water quality
- prioritize high quality drinking water + water for wild creatures
- no logging or road building on steep or unstable slopes
- set specific + rigorous climate goals
- evaluate management impacts ~~on a regional~~ on a regional basis for climate change
- protect + restore old-growth + large blocks of intact forests as havens for stressed fish + wildlife
- assess the effects of management activities on soil health + how that affects plants, fungi, invertebrates, + overall species diversity
- recognize the health of the soil and its inhabitants are an important foundation of a healthy ecosystem



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Portland, Oregon

### Individual Participation/Input

NAME/AFFILIATION

(Optional): Martin C. Evans, volunteer, BARK

Email Address (Optional): martincevans@msn.com

Please share your input on the new Planning Rule process.

the Planning process is an opportunity for the Service to rigorously comply with its congressional mandate of "multiple use, sustained yield" in light of changing conditions in a way that is scientifically sound and respects the democratic spirit of NEPA. Many historic forest uses and management actions are fundamentally incompatible with sustained yield because they cause soil erosion, water pollution, or permanently change the character of the land. The Service has no mandate to accommodate logging, OHV use, road building, ski areas or other development under the banner of multiple use if it degrades soils, biodiversity, or carbon storage. The forest must be delivered to future publics intact as much as possible, even though my daughter and her future descendants cannot engage in public meetings or collaborative groups, they still enjoy the full protection of NEPA. therefore, management must be guided by independent scientists or through public input processes that are independent.

toward landowners, industry, rural westerners, and adults, and against urban people, renters, easterners, and children and future publics.

These principles should be codified in the planning rule.

- Public forests are the highest-density carbon sinks in the world.

Manage for net gain of biomass, which means, no logging on older or old-growth forests or after fires, no net gain in road area, no soil loss, and no removal of biomass for energy or so-called win-win logging-for-restoration schemes.

- Don't fight most fires, It is not scientifically indicated, it wastes money, and it harms long-term forest health and carbon storage.

Real restoration of "overgrown" forests is expensive and cannot remove biomass or add roads. It is not consistent with revenue generation or logging.

- Some recreation has a sustained yield b/c it has no long-term impact. Some cannot have a sustained yield and the Service has no mandate to accommodate it.

- Make Service business practices consistent with forest management goals: use only recycled paper and FSC certified lumber in Service offices and buildings and practice the highest standards of water conservation and treatment and fuel efficiency.

- Quantify the value of carbon storage, clean water, wildlife, and non-timber forest products. Their value is enormous even when they are not exchanged in a cash marketplace.

- Assume that timber poaching, illegal dumping, illegal off-roading and violations of Wilderness Act rules will occur and have a robust plan to deal with them.

- Forest-dependent communities are struggling economically because of past violation of sustained yield principles. Don't compound the problem for future rural publics by promoting temporary, unsustainable, extractive jobs.

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Individual Participation/Input

NAME/AFFILIATION

(Optional): Ethan Ludwig Emerald Trail Riders Association

Email Address (Optional): Ethan.fnp@comcast.net

Please share your input on the new Planning Rule process.

The USFS should not speculate or involve itself in issues surrounding Global Warming. Congress should provide direction legislation regarding Global Warming.

The USFS should ~~allow~~ cooperate with adjacent lands issues without expecting ~~as~~ a legal obligation for those adjacent lands to do so.

The forest service should make it a priority to provide multiple-use sustained-yield management for the public. There is a growing demand for OUV recreation and a decreasing supply.

The USFS should consider the broad economic impact of closing OUV trails on the local and national economy.

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Portland, Oregon

Individual Participation/Input

NAME/AFFILIATION

(Optional): Beverly Ryan - Recreation User

Email Address (Optional): bryan9@rol.com

Please share your input on the new Planning Rule process.

For records to the NPS being changed with  
Climate changes I feel this is not a Science  
at NPS should be changed with  
Climate is a World Wide Concern. A separate  
US / UN Agency should be responsible for  
monitoring, recommending & reporting.

The Rule should not be this complicated.  
It should be an "Outline" clear and  
simple for the East region and forest  
should follow. ~~The way the~~ Local  
regions are detailed.

I am pleased with the public being  
involved in the planning.

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Portland, Oregon

**Individual Participation/Input**

NAME/AFFILIATION  
(Optional): Lisa Wright - The Mountaineers  
Email Address (Optional): lisa.w@mountaineers.org

Please share your input on the new Planning Rule process.

These meetings are a great first step in more  
open, comprehensive collaborative planning for  
the USFS. We are dedicated to the  
whole ride - through to 2011 and a Final  
Rule = Implementation.

April 6, 2010  
Planning Rule Discussions  
U.S. Forest Service – Pacific Northwest Region  
Portland, Oregon

Individual Participation/Input

NAME/AFFILIATION

(Optional): Mike Hayden / cougar area trail seekers

Email Address (Optional): mike.hayden@tds.net

Please share your input on the new Planning Rule process.

Table #9 → Plans could address recreation  
and enjoyment of M.F.S. lands

1<sup>st</sup> - Plans Should address recreation and  
enjoyment of M.F.S. lands

It was difficult for me to tell some  
-kids<sup>young men</sup> just back from IRAQ that they couldn't  
ride on U.S.F.S. lands in the Clifton Pinchot with  
their A.T.V.s with their friends.

2nd - we should not lose the mile for mile  
rule.

3rd - Hunting rules and regulations should be  
done by states wildlife Department including  
introduction of new species to an area.

From: dave werntz [mailto:dwerntz@conservationnw.org]  
Sent: Tuesday, April 06, 2010 10:42 AM  
To: ForestServiceMtg@LSAresults.com  
Subject: Re: Live Webcast - April 6 Planning Rule Meeting

Comments from Dave Werntz - Conservation Northwest

National Forests provide vital fish and wildlife habitat, clean drinking water and world-class recreation opportunities for millions. And they're one of our best tools for mitigating and adapting to a changing climate.

NFMA regulations must direct agencies to perform crucial landscape-scale restoration activities that ensure America's forests continue to provide ecosystem services for generations to come.

#### 1. Climate Change

Protect mature and old-growth forests and large blocks of intact forests (roadless areas greater than 1,000 acres) and watersheds to serve as carbon stores, and to provide habitat connectivity across landscapes for climate-stressed fish and wildlife.

#### 2. Water Resources

Protect and restore watersheds to provide high quality water. Providing high quality water requires protective stream buffers, and rescaling the over-built road system.

#### 3. Fish and Wildlife

Restore and maintain healthy and viable fish and wildlife populations and their habitats, provide for species diversity, and assess the effect of agency actions and changing conditions through population and habitat monitoring.

#### 4. Sound Science

Ensure that both the forest planning rule and subsequent decisions are based on sound science by convening an independent scientific committee to recommend policy options, and then critique the proposed rule and evaluate the likelihood of achieving stated objectives.

#### 5. Accountability

Specify standards and guidelines for management helps ensure consistency across landscapes, avoids controversy, and helps build public trust. Unfortunately, excessive discretion leads to abuse of discretion and continued conflict and controversy. Clear rules will help managers stay on a path toward restoration of the forest and public trust in the agency. Provide mechanisms for holding managers accountable to the rules and forest plans.

6. Habitat connectivity - revising forest plans to "protect, reconnect, and restore" national forests will require regional planning and management, as has been done in the Pacific Northwest with the Northwest Forest Plan. The Forest Plan rule should acknowledge and encourage regional-scale planning for wide-ranging species.

**From:** Dick & Linda Butler [mailto:rlbutler@cavenet.com]  
**Sent:** Sunday, March 28, 2010 8:22 PM  
**To:** forestservicemtg@LSAresults.com  
**Subject:** Region 6 Planning Rule

Dear Sir/Madam: as President of the Sourdough Chapter of Back Country Horsemen of Oregon, located in Southwest Oregon, I am taking the opportunity to make a few comments relative to the Region 6 Planning Rule. One of the most important of these comments is that the USFS should ensure that quality recreation opportunities are afforded the public. This includes a variety of types of recreation and needs to be based upon an inventory of opportunities available.

The USDA Forest Service Strategic Plan for Fiscal Years 2007-2012, signed by past Chief Gail Kimball included strategic direction for recreation to provide "A variety of high-quality outdoor recreational opportunities on the Nation's forests and grasslands.....". That goal is precisely the one that should be pursued in the Planning Rule.

In pursuing that goal, USFS should coordinate with appropriate contiguous jurisdictions in order to provide a well thought out continuum of trails, trail heads, roads, transportation systems and recreation facilities that would meet future demand for such recreational infrastructure.

Thank you for the opportunity to comment on this critical rule.

Richard E. Butler, President  
Sourdough Chapter, Back Country Horsemen of Oregon

471 Draper Valley Road  
Selma, Oregon 97538



April 6, 2010  
Planning Rule Discussions  
U.S. Forest Service – Pacific Northwest Region  
Portland, Oregon

Individual Participation/Input

NAME/AFFILIATION <sup>1</sup>  
(Optional): JARED ACHEPOHL - PRESIDENT EMERALD TRAIL RIVERS ASSOC. (OHV CLUB)  
Email Address (Optional): jared@etra.net

Please share your input on the new Planning Rule process.

- 1 The Planning Rule must include Recreation as a primary use of Forest Service land.
- 2 Public input must exceed current attempts
- 3 The far-reaching ~~impact~~ economic impact of motorized OHV use is widely ignored in the current Forest Plans. Recognize the scale of Forest users that support our economy.

**April 6, 2010**  
**Planning Rule Discussions**  
**U.S. Forest Service – Pacific Northwest Region**  
**Portland, Oregon**

**Individual Participation/Input**

NAME/AFFILIATION

(Optional): Patrick Aitchison

Email Address (Optional): patrick.aitchison@gmail.com

Please share your input on the new Planning Rule process.

All threatened, endangered, and candidate species should  
be MIS or focal species because they show the  
fastest response to both climate change and invasive  
species encroachment. Ex. pika in alpine ecosystem.

Species should not be selected primarily because they  
are easy to monitor, because such species will often  
be ones that do not need to be closely monitored.

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April 6, 2010

Planning Rule Discussions

U.S. Forest Service -- Pacific Northwest Region

Portland, Oregon

Individual Participation/Input

NAME/AFFILIATION

(Optional):

Randell Drake

Email Address (Optional):

jRMDrake@msu.com

Please share your input on the new Planning Rule process.

- ① All outdoor Recreation must be treated equally. ~~the~~ motorized or non motorized must be treated equally for trails
- ② Motorized Recreation must include all three Class of OHV's. Class I, Class II and class III. All must have trails that allows user satisfaction.

See Attached pages!





## National Forest System Doesn't Work

by John Malone, Forestry Consultant

In 1905, Teddy Roosevelt and Gifford Pinchot conspired to set aside much of the public domain to protect watersheds and wildlife. These lands became national forests. For many years to come the management of these forests was custodial - clearing trails and fighting forest fires by "a few good men" (i.e. forest rangers). Timber harvesting became a major activity in the 1940's, to support the war effort.

After World War II timber harvesting continued and increased, and recreation became a major use also. Late in the 1960's, environmental concerns surfaced about mainly the timber harvest and road building programs. The concerns were addressed by many groups, and by a national committee. The result was a deserved cutback in these programs. Sustainable forestry became the order of the day.

However, the cutbacks became so severe that most of our National Forests are being poorly managed. The severity of these cutbacks is due to litigation by environmental groups and by lack of funding from Congress. The major activities of national forest management now are supporting a very large custodial staff and fighting wildfires. Recreation is still being supported some, but mostly by "pay for play" programs.

Much of the wildfire activity is due to custodial management of the national forests for many years, and the infiltration of property owners in adjacent forests. Or in other terms, wildfires burn uncontrollably in over-dense forest created by suppressing natural fires for the past 100 years, and fire fighting has concentrated on protecting structures in addition to suppressing fires in the national forests. Community fire departments provide most of the protection for structures. but you, the taxpayer, are paying the bills.

Another issue: bark beetles. Bark beetles thrive in over-dense forests because the trees are low in vigor and cannot (literally) pitch them out. This exacerbates the wildfire situation even more. Meanwhile our country is competing with other countries for resources, and billions of tons of wood fiber either go up in smoke or are left to rot on the stump (i.e. beetle kill). Large amounts of smoke are not good for our local airshed or our planet. And sadly enough, radical environmental groups fight every effort the Forest Service makes to salvage these billions of tons of wood fiber. When the FS is able salvage fire-killed or beetle-killed trees, which is only on a some occasions, the process required to do this is so lengthy that the trees are too defective to make lumber or plywood. So what should be done. Our national forests need more intensive management to provide the resources and amenities they are capable of providing and, as scientifically proven, to lower the risk of catastrophic wildfire and insect infestations. In my humble opinion, Congress and the administration should turn over the national forests to the states. This would not only get rid of an incredible amount of bureaucracy, but would localize the management of these forests in established organizations - state forestry departments. State forestry departments would have to make some big changes to include in-state national forests, but most would agree that management at state levels is far more effective than being managed at the whims of Congress.

(John Malone, East Wenatchee, WA, is a forestry consultant who has prepared numerous forest health timber harvests and forest management plans for private forest landowners in North Central Washington. He retired from the Wenatchee NF in 1993).

## Comments for Consideration

USFS Region 6 Roundtable Event (new Planning Rule)

April, 6, 2010

Sorry, I am not able to attend due to other meeting commitments, but include me in Planning Rule communications as the process moves forward.

### Primary Focus- Protection from Fire and Adjacency Risks to Private Lands

While the comments below are from a private sector natural resource industry subject to the success and/or failure of policy and practice on adjacent lands, I also support these comments as a US Citizen and taxpayer as these lands and resources are MINE by right and entrusted to you to manage effectively and responsibly for multiple use benefit.

Oregon has a very unique and successful history of landowner involvement, collaborative spirit with innovative and creative success. Landowners realize and respect each landowner may have different objectives, policies and practices just like different agencies. While we wish the best for everyone's unique goals and expectations on their ownership, there must be a respect and effort to keep the impacts for one's set of values not to impact those of another (basic Common Law). These individual needs must also be considerate of shared suppression resources that are dependent on peak season need to protect cooperators responsibilities and stakeholder values.

- **AMR – Most Current Concern – 2009 Federal Wildfire Policy/Guidance/Interpretation**
  - This “vehicle” has the most potential to be the trigger for the concerns mentioned previously. The 2009 Policy allowing variable suppression response including no suppression action for resource benefit has the potential to become more complicated, costly and damaging multi-jurisdictional events.
  - Landowners recognize the value and benefit of the reIntroduction of fire, but should be restricted to fire strategies identified as a priority on lands having been previously treated through mechanical means or previous prescribed fire reducing the Condition Class to a more natural and resilient state.
  - Decisions consider time of year and fuel conditions displayed by “modeling tools” to assess risk and probability of success during peak fire season conditions. In un-treated stands and duration of event don't seem to support the models consistently resulting in greater risks to firefighters and shared resources, safety and neighbors.
    - Is it possible to note the location of natural starts, suppress and reignite later in the fall and allow it to creep until winter?
    - Using a “natural” ignition (lightning), in an “un-natural” condition (fuel loading) and expecting a “natural” outcome is highly questionable and costly (safety & resources) logic.
    - Replicating the ignition location (GPS) later in the season (or earlier in following season) would result in more of a natural outcome with reduced risk and reduced impact on shared resources.



- Encourage effective initial attack to minimize safety issues that grow exponentially for firefighters and public as the fire grows in size and complexity.
  - Remind managers that every acre of private land is important in providing forest products, jobs and income.
  - It should not be a given that the best place to stop a fire coming from federal lands, especially coming from designated Wilderness or Roadless Areas, is on private lands with managed fuels and ease of access. Currently there is a feeling of higher landowner liability and risk owning/managing property adjacent to federal lands.
  - Risk assessment – Regionally and locally encourage local managers (public, private and state) to work together in identifying the boundaries that represent the greatest risk. Work together to develop/implement plans to reduce risk, e.g., fuel reductions, fire breaks, dip tanks/ponds.
    - Identify Good Neighbor Authority Program opportunities.
  - “Resource Benefit” fires are a result of man-made decisions, thus a form of prescribed burning. Oregon’s Smoke Management Program went through an extensive review a few years ago. A decision was made to remove the “exemption” for Forest Health Burning supported by all, including USFS/BLM representatives on the committee. There are many that feel these Resource Benefit Burns should be subject to ODF Smoke Management approval and fees. Continued public pressure on air quality (grass seed burning was banned in our last legislative session). Continued ability to do any prescribed burning must show that those who are conducting these man-made approval operations (even with natural ignition source) are conducted within prescription (no escapes and favorable weather conditions) and are paying their fair share.
  - Resulting escapes from Resource Benefit, Wilderness, Roadless fires or negligent action that damages private lands should be compensated for suppression cost and resource loss.
    - Currently federal agencies can sue for damages, but no one has been successful in holding the government accountable for their actions?
  - Peak season Resource Benefit fires create firefighting resource shortages. Shared contracts; crews, tender and engines, risk the success of cooperators’ obligations and goals.
  - What may be seen as an initial safety concern or the least cost management action for the jurisdictional agency may end up being the most costly decision for everyone.
  - While the Flame Act helps protect critical funding to accomplish fuel reduction projects (which we support) if we don’t change policies, guidelines and interpretations to current firefighting practices, all this becomes just another pot of money to draw from.
- Broad acceptance and recognition of “Wildfire Costs” as Cost + LOSS is necessary.
    - The fire and forestry community have long known that the actual cost of wildfire is the suppression cost + resource loss + reforestation cost while still sacrificing the loss of time and growth. In today’s environment, social expectations (general public, conservationists and natural resource managers) are under greater expectations to the management and care of air, water, wildlife habitat, carbon etc. Current pressures for suppression budgets are difficult to justify without considering these broad values. Considering the broader values should translate to more attention to minimizing fire size and subsequent damage in effective initial attack response also allowing more funding to go for necessary fuel treatments.

- Differing, confusing or individual interpretation of jurisdictional priorities relating to fire can create problems, frustration, added cost, safety issues and unnecessary resource loss. This may seem trivial, but when decisions/interpretations are being made with these #1-#2-#3 priorities our “resources”, which also happen to be “property”, tend to be relegated to the lower priority.
  - ODF priorities – Life, Resources, Property
  - USFS priorities – Currently, Life, Property and Resources (leading to a #1,#2,#3 list)
    - Suggest a revision to Life, Property or Resources. While it may never be a politically or socially acceptable/understood decision...homes can be Insured and rebuilt whereas our forest “resources” (property) can neither be rebuilt nor insured.
    - Safe and aggressive initial attack is the best suppression response to keep fewer individuals exposed to safety risks, minimize resource loss and collective Cost + Loss.

Risks to private lands adjacent to Wilderness or Roadless Areas include the difficulty with access, excessive fuel loading and equipment use limitations in these areas tend to result in large fire growth, increased safety exposure and environmental damage (air, water, habitat). Our adjacent managed lands then become the only/preferred or logical place to stop your fire....logical to the fire managers but an unacceptable assumption to those sacrificing.

- Consideration of any “new” Wilderness or Roadless designation shall include plans to mitigate added risk to adjacent land risk by:
  - A) commitment to maintain fuel breaks on the boundaries,
  - B) compensate landowners for the loss and reforestation cost (continued suppression cost liability) and/or
  - C) Appropriate sufficient initial attack resources to address the new added risk to maintain, protect and defend that which made it so valuable to protect in the first place.
- Develop an action plan to address risk of “existing” Wilderness or Roadless areas.
  - Commitment to maintain fuel breaks, at a minimum on boundary.
  - Continue to cover suppression costs
  - Evaluate loss circumstances with possible compensation for willful, malicious or negligent actions.
- Adjacency Risk Assessment (mentioned previously). Collaborative work to secure grants for fuel reduction, fuel breaks, risk reduction along high risk Forest Interface boundaries.
  - “Interface” has traditionally been accepted as Wildland-Urban Interface with risks to communities and homes only. We as adjacent forest land owners expect equal consideration of the “Forest Interface” where productive, intensively managed forests that provide products, jobs and income (rural community viability) that are also at risk from fire impacts.

As always, feel free to contact me to discuss these or any other matter.

Sincerely,

A handwritten signature in black ink that reads "Mike Dykzeul". The signature is written in a cursive, flowing style.

Mike Dykzeul  
Director, Forest Protection  
Oregon Forest Industries Council

*mike@ofic.com*

Rebecca's table

**Lois Schwennesen**

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**From:** Guy Michael [guymining@hotmail.com]  
**Sent:** Wednesday, April 07, 2010 8:09 PM  
**To:** Forest Service Region 6  
**Subject:** Additional comments that time did not allow for me to make while attending meeting

Planning Rule Roundtable Discussions  
U.S. Forest Service – Pacific Northwest Region  
Portland Oregon April 6, 2010

**From:** Guy Michael, Vice President  
Eastern Oregon Mining Association  
PO Box 932 Baker City OR 97814

I sat at table six; we discussed the “effective and proactive collaboration with the public.” Please accept these comments as part of the substantive comments received for this planning rule, which is expected to be finalized in November of 2011.

I brought with me six items that needs to be part of this new rule; however, based on the limiting factor of table subjects and personal time constraints of having one-way, 6 hour drive time. I was only able to explain two of the most important items that I brought with me; to be sure this new rule will not overlook my fields of interest, mining and local government, I send these comments. I was assured that further comments can be made, for three days, to the same email address that the RSVP was sent for this discussion, which was in Portland, Oregon:

[ForestServiceMtg@LSAResults.com](mailto:ForestServiceMtg@LSAResults.com)

**Statutory mandates not open for public collaboration**

My first comment at the table was that collaboration with the public must be understood to not include collaboration for non-discretionary decision making by the Forest Service, especially when it pertains to certain mining. Statutory requirements do not have discretionary decisions because those requirements are mandates by Congress. Collaboration can be held concerning those decisions where the Forest Service has discretion.

Although there are non-discretionary decisions for other things than just mining, it is important that mining be mentioned with any other items that can be included to this list, because the locatable category, at least, has been current in the statutes since 1865, and the length of history for this activity deserves its mention to avoid any confusion over the non-discretionary nature of this type of mining category.

Notes were made that the rule should include statutory requirements that will be adhered to. My concern is that it will also include, “and not open for collaboration with the public, when developing Forest Plans;” or that, “Forest Plans will adhere to statutory requirements concerning mineral development...” The National Materials and Minerals Policy, Research and Development Act of 1980 restates the need to implement the Mineral Policy Act of 1970 stating: “The Congress declares that it is the continuing policy of the Federal Government in the national interest to foster and encourage private enterprise in (1) the development of economically sound and stable domestic mining...” (30 USC 21 (a)).

**Coordination with local governments**

The second item of concern is this new rule should require coordination with local governments, as the 1982 Rule incorporated it as stated in Section 219.7 and Section 219.14. In the National Forest Management Act (NFMA), Congress directed the US Forest Service to “coordinate” its land and resource management plans “with the land and resource management planning processes of State and local governments...” The National Environmental Policy Act (NEPA) presents similar understandings; therefore, because of the statutory requirements involved, this rule should mention that Forest Plans will adhere to the coordination requirements of the NFMA.

### **RS 2477 right-of ways**

The third item is that the rule should require the Forest Service to determine the potential for historic right of ways known as RS 2477 in any forest plans and projects. It was stated in the Federal Register for the Travel Management Rule, FR December 9, 2008 Vol. 73 No. 237 (pages 74689-74703), on page 74694:

“The Forest Service may, however, make a non-binding administrative determination (NBD) as to the potential validity of an R.S. 2477 right-of-way claim for land use planning and management purposes. If the Forest Service identifies a potentially valid R.S. 2477 right-of-way claim through the NBD process, the agency will encourage the claimant to accept jurisdiction pursuant to an easement granted by the U.S. Department of Transportation (23 U.S.C. 317) or by the Forest Service under Section 2 of the National Forest Roads and Trails Act (FRTA) (16 U.S.C. 533) or to adjudicate the claim pursuant to the Quiet Title Act (28 U.S.C. 2409a).

In making designations for motor vehicle use, the responsible official must **recognize valid existing rights** (see 36 CFR 212.55(d)). FSM 7703.3 provides an administrative framework for meeting this requirement by providing guidance on documenting jurisdiction, transferring jurisdiction, and exercising jurisdiction over forest roads, based on factors such as the right of individuals and local public road authorities to own, operate, maintain, and use these roads. There is no need to repeat this guidance in FSM 7715.75 (recoded from FSM 7715.65 in the proposed directives).”

While I agree that there is no need to repeat any guidance, however, to help keep clarity and potential problems to a minimum this new rule should allow any forest plans to have NBD to identify potential valid RS 2477 right-of ways, as roads, trails, ditches, etc., for management purposes as one of the levels to address in the forest plans. The Forest Districts’ involved in writing forest plans must also understand that “**regulation**” of RS 2477 right-of ways are not allowed as stated in 43 USC 932, “...no regulation of any agency of the Federal Government pertaining to the recognition, management, or validity of a right-of-way pursuant to Revised Statutes 2477...” as these fall within State law or local jurisdictions.

### **Mineral Development**

The next three items would probably have been best introduced at table 5: Plans could foster sustainable NFS lands and their contribution to vibrant rural economies.

The new rule should state that, mining operations that are required to have a plan of operations (Plan) are not required to be grouped in the NEPA analysis with other mining operations. Each mine will submit a plan at different times and should not have to wait for any other; any analysis required including cumulative affects can be used to supplement and make it easier for other submitted Plans in the watershed; only changing or adding for anything that is different. A case in point is that the Wallowa Whitman National Forest wrote an analysis for the North Fork Burnt River Watershed EIS finalized in 2004. An environmental organization sued, 2005, and now multiple Plans and operations, about 49 of them, are still waiting to go to work six years later as the supplemental analysis is expected in the FR by February of 2011. Each mine must stand on its own merit. Any analysis information can be used to supplement any required for a nearby operation that might be expected.

Also, readdressing the Categorical Exclusion, which may take new statutory support, could be expanded to develop a CE for small mining operations that will not likely impact items on the NEPA list for extraordinary

circumstances and allow the small mining operation under this special CE to operate beyond the one year time frame.

Another point that needs attention is any Plans based on non-discretionary decisions for mining will be processed as next in line before any discretionary plans or projects that are current, but have not been started yet. Certain mining projects have statutory authorization rather than agency discretion; those mines seeking Plan approval or review should not be placed last; while the agencies have a choice or discretion to work on certain plans and projects.

Finally, if there is a State Bond Pool available the Rule should recognize it as a viable means to bond those mining operations that need a bond should the operator wish to use it. Mineral development is a necessary component to the economy of our Nation. These suggestions will help to simplify, clarify, shorten planning and help ensure on the ground projects are encouraged and eliminate analysis paralysis that currently seems to prevail in the private enterprise of development of economically sound and stable domestic mining.

Thank you sincerely,

Guy.

Lois Schwennesen

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From: Chuck Hurliman [churlima@co.tillamook.or.us]  
Sent: Thursday, April 01, 2010 3:37 PM  
To: ForestServiceMtg@LSAResults.com  
Cc: Rocky McVay; Debby J. Mendenhall; Tim Josi  
Subject: Planning a Healthy Forest and Communities

Planning a Healthy Forest and Communities

History of the northwest shows the Native Americans relied on the natural resources around them for their survival. They managed these resources to benefit their fishing, hunting, and gathering lifestyle, using the tools at hand. One of their most important tools was fire. In the Willamette Valley the fires maintained grasslands and open Savannah of the pine and oak. Repeated fires favored grassland plants, which they collected for food, such as wild wheat.

National Forest management strategic planning looks at the health of the forest and community within management context. It is a thoughtful forest management plan that will ensure a predictable timber supply that generates revenues for our schools and local economies, diverse habitats for wildlife, fish and recreational opportunities. This will, in turn, benefit local and regional opportunities for forest recreation (such as hunting, berry picking, wildlife viewing, hiking etc) as well as aid fire protection, forest health and revenues for counties to maintain access roads to the national forest and educational opportunities for our rural school children. The management plan should also provide strategies for properly functioning aquatic and riparian habitats which will benefit the recreational and commercial fisheries.

Effects of dollar loss do to non management of our national Forest or the lack of support from the administration for reauthorization of the secure rural schools and communities self determination act will result in losses to our road system net-work including National Forest access roads. Priorities will be placed on our limited funds for roads maintenance leading to rural and national forest access roads turned to gravel or decommissioned. This in turn will affect the remaining economy of our county. It will cripple our local government in providing other essentials such as law enforcement, search and rescue, etc...

Congress recognized the adverse local impacts of retaining the National Forest Lands in nontaxable federal ownership, and in 1908/1911 passed legislation requiring revenues from timber harvests on National Forest lands to be shared with county governments, for use supporting roads and schools. For 80 years, until the 1990s, a federal policy of forest management and wise use produced shared timber receipts that supported local governments, roads, schools and other services.

Charles J. Hurliman  
Tillamook County Commissioner  
Phone 503 842 3403 cell 503 801 0004 email [churlima@co.tillamook.or.us](mailto:churlima@co.tillamook.or.us)



**Mona Drake**

19210 Pinehurst Rd

Bend OR 97701

**Region 6 Pacific Northwest 4 Wheel Drive Association**

**Deschutes County 4-Wheelers Trail Development Committee**

**Harney County High Desert Wheelers**

**High Desert 4X4 Bend Oregon**

April 6, 2010

United States Forest Service-Pacific Northwest Region

Attention: Forest Service Planning Rule

Dear Managers of our Public Lands,

We applaud the Forest Service's attempts and efforts as they try to follow directives from Washington DC and incorporate management of our natural resources into these efforts. Collaboration in developing a new Planning Rule to manage 193 million acres of the public's holdings will be a monumental task. Special interest groups are more often than not well funded, well armed and well prepared and therefore receive the most attention, a perfect example of "the squeaky wheel getting the most grease."

The United States Forest Service is just now finishing up on a "Travel Management Plan" that was a collaborative exercise as this new plan proposes. The "Travel Management Plan" was used by special interest groups to close many areas of recreation to the public that utilized their historic camps, trails and areas.

The Travel Management Plan summary states the objective: designating trails, roads and ways for all classes of vehicles, to eliminate "cross country travel". The special interest anti access groups utilized the collaborative system to force closures of trails, roads and ways. Closing areas where no resource damage had occurred. Class II vehicles, the 4x4's were completely overlooked. Old jeep trails were obliterated which had been used for decades by families for recreations of all types.

Collaboration is not effective when bullies with agendas contrary to the good of the whole carry larger weapons and larger coffers.

***"Our National Forests and Grasslands are great natural treasures that we must conserve and restore for the benefit of future generations," said Agriculture Secretary Tom Vilsack. "Developing a new planning rule provides the opportunity to manage national forests and grasslands for the benefit of water resources, the***



***climate and local communities.***” Local communities are made of a wide variety of individuals and families. These families and individuals cannot hire attorneys to keep their favorite trails and camping spots open. The US National Forest Service did a great disservice to many by allowing closures of their historic trails in the Travel Management Planning Sessions of late.

The US Forest Service’s collaborative input statement reflects the by-words public input and public comment. Of late the USFS “does” as whatever special interest group’s litigation threatens. The recent Travel Management Plans were highly ineffective with their “Public Meetings” and “Public Comments”. Meetings held during the comment periods were scheduled during work hours and publicized by the USFS ineffectively. The public did not understand the implications, the overall effect or magnitude their comments may or may not have influenced to the managers of their forests. The USFS must facilitate effective information dissemination to effect fair public anything. The USFS fell short and neglectful in the recent Travel Management Planning concerning the public’s wishes. When decisions were made in favor of Class II vehicles anti-access groups quickly threatened legal actions and forest managers readily rethought their decisions.

The US FS “could” list of principles and process is misleading and in-genuine to “the public”. In truth the USFS “could” utilize much of the public in restoration, conservation, and monitoring, maintaining and the general health of all forests. The USFS is a failure at education, information sharing/gathering, implementation of facts and truths of the forests they are stewards of. The rural public cares for its forests; the rural public knows its forests. The USFS has never published adequate mapping, adequate resource concerns or even adequate historical and biological facts on any of its forests. When a family entered a forest they were exploring, the roads marked are often mismarked. The United States’ forests are a foot print of an historic record yet as you traverse the trails there are rarely any kiosks or explanations of the forests’ history recorded. Let alone the individual forests health or well being.

The USFS “should” involve the public. Education of the truths on all aspects, forest fires kill healthy forests and its habitats. Healthy forests are not what “old growth” proponents proclaim. Old trees are dying trees and should be removed for the younger and healthier trees to survive and flourish the forest. Trail density may be an issue but a total roadless area inhibits forest health also as fire suppression etc... is curtailed. Forests become infested with harmful insects, noxious weeds and over run with dangerous levels of flammable fuels from lack of care. Preventive health care of forests may mean utilizing herbicides, brush thinning or insecticides.

Climate change is not an exact science. Climate change effects are as old as the world. Climate change has been a constant since the world’s inception, creation or when the

world came into existence, however you believe it happened. The USFS reaction and especially over reaction to any change in the forests climate should be from experience not special interest group consensus. Reacting to a public's fears on climate change dramatically exhibits the USFS's own "Faith Based Religion".

***"Sustainable" means to create and maintain conditions, under which humans and nature can exist in productive harmony, that permit fulfilling the social, economic, and other requirements of present and future generations of Americans.***

***Executive Order 13423—Strengthening Federal Environmental, Energy, and Transportation Management. January 26, 2007.*** The above statement is a lofty goal, I feel the USFS has failed in its recent "Plan" stopping cross country travel. The agency allowed itself to be used by special interest groups to curtail the harmony mentioned. I fear this present "Plan" an extension of the later. Forests unmanaged by designation into Wilderness or forests left to rot and not harvested after forest fire upon forest fire is not a harmonious picture, but devastation, a travesty of neglect.

USFS publication: ***Montreal Process Criteria for the conservation and sustainable management of temperate and boreal forests***

- 1) Conservation of biological diversity***
- 2) Maintenance of productive capacity of forest ecosystems***
- 3) Maintenance of forest ecosystem health and vitality***
- 4) Conservation and maintenance of soil and water resources***
- 5) Maintenance of forest contribution to global carbon cycles***
- 6) Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies***
- 7) Legal, policy, and institutional framework***

***Our actions in the coming five years—to help define the paths forward for adapting forests to climate changes and using them to mitigate greenhouse gas emissions; to help shape the role of forest biomass in offsetting increased use petroleum; and to help stem the loss of forests and the ecosystem services they provide—have the potential to shape for future generations the forests they will have to manage, conserve, protect, and use. Will future foresters and citizens 130 years from now be able to look back at this point in time and say, well done! Will forest historians and policy makers then be able to point to actions taken now as turning points in the sustainable management of the Nation's forests? We hope so. But it will take brisk action from all of us.***

Historically the forests have been utilized by the civilization of the era. Will my children be permitted use of the forests as I have? Sightseeing from touring vehicles, hunting and fishing, gathering fire wood? Closing gates to the forest's entrance and claiming management is but an offensive exclusivist action. Managing forests will require much of the stewards who claim the responsibly, partnership in education, policing and maintenance. Litigation should not be the winner.

Forest Service Planning must embrace motorized vehicle travel fairly. Since wheels had motors attached the public has accessed the forest's boundaries. The USFS has not designated trails for 4x4 travel adequately. The USFS must understand and incorporate motorized recreation in each venue and arena of the forest. Do not assess an environmental issue without including motorized recreation. The forest's sustainability, rehabilitation, and health stems on the utilization factor of the public. Education prevents most resource damage. Rehabilitation and education will sustain the public's right to motorized recreation throughout the nation's forests. Do not be negligent in this "new plan". Address motorized recreation the fastest growing sport. If you do not embrace the issue of 4x4 travel and designate areas and trails for the public, by default the public will.

Sincerely,

Mona Drake



Randy Drake  
19210 Pinehurst Rd  
Bend OR 97701

Region 6 Pacific Northwest 4 Wheel Drive Association  
Deschutes County 4-Wheelers Trail Development Committee  
Harney County High Desert Wheelers  
High Desert 4X4 Bend Oregon

April 6, 2010

United States Forest Service-Pacific Northwest Region  
Attention: Forest Service Planning Rule

Dear Managers of our Public Lands,

Class II Vehicles are the largest group of public land users and they really are not being accounted for. Most Americans (97%) access the public US Forest lands in a Class II vehicles. Some will have hiking gear, mountain bikes, Class I and III OHVs, pulling horse trailers or trailers full of all three to spend up to weeks on public lands. We are the people that are now using what is left of the rapidly disappearing acres of backcountry. We arrive in a Class II vehicle, and will continue using this vehicle or another OHV, while visiting the forest. This plan should include the impacts of OHV as doubling over the next ten years. Yes, Region 6 has considered them a little bit through the travel management plan but not to the extent that will secure our future use. Thousands of miles of Level I and Level II roads, trails and ways through the forest have been closed to the American people. Thousands of miles of access to the forest have been closed to the aging and disable men and women of this nation. This plan should make it a priority of keeping these roads and camping areas open to us for hundreds of years to come.

As most Americans will not use wilderness but will use the lands that are open to motorized travel. A new category of lands needs to be written in to our laws of our Forest Service, which is called Back Country. Back Country is open to all the Men and Women that work and play on public lands. **Lands that cannot ever be turned into Wilderness, National Monuments, National Parks, ETC...** but open for Americans to Work and Recreate on particularly the largest user group, which is motorized. Let the existing wilderness, National Monument, Parks, etc... be for hiking and back packing and the other lands left open to the majority of Americans. Back Country would be open to Motorized Vehicle travel for work and outdoor recreation. With a network of roads and trails, thousands of miles long which are connected to all public lands. From Mexico to Canada trails spidering out to all the states that have connecting lands. Trails that are

open to all Three Classes of OHVs. Trails built from easy to very difficult with no one class of OHVs receiving preference over the other. These roads and trails would not receive a blade or gravel but would be natural and repaired only by those passing through.

Back Country is a lofty goal that we all should be working on. Lands open to all the people and that cannot be closed for any reason. American people need US Forestlands to recreate on and Class II motorized use is a legitimate way to enjoy these lands. This is stated in the GAO (June 30, 2009) and the Federal Register CFRs. Recreational opportunities, includes all classes of OHVs (Class I, II and III) and each are looking for only one common aspect and that is recreating on public lands. Some are looking just to find a remote spot to enjoy a vista, fishing spot, hunting spot, camping spot etc... While others are using their motorized vehicle all the time, they are using the backcountry. From easy trails to extremely difficult trails, backcountry must be set aside for our use now and for generation to come.

What is land management if the forests are allowed to rot away? The forests are for man to use as it is a renewable resource, a natural resource used over and over again. These plants and grasses need to be harvested as they mature. Why are we here to share our ideas if the anti-access environmentalists will stop all our activities within the Forest except walking around? Now the forests are so clogged full of under brush, harvestable trees and eatable plants that walking paths have to be created. I remember how beautiful the forest was as a young adult. Now look at them! Millions of board feet of lumber rotting away in America's forests. Fodder for livestock is not grazed and rots on the forest floor. What kind of watershed does that provide the people of our land? Nothing; so what is the purpose of this meeting if nothing can be done other than what is dictated to you and the American people by a handful of anti-access environmentalists. If these same lands where Backcountry they could not stop the land from being used in a sensible manner as our ancestors did.

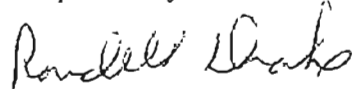
What is *Agricultural* about allowing harvestable trees to stand in the forest as you allow the anti-access environmentalists tell you they cannot be logged? What is *agricultural* about leaving millions of acres un-grazed so the grasses die where they stand? The under brush chokes up the new trees so bad they become stunted, what is *agricultural* about that? Then we all stand back in August and September and watch it all become an inferno. What is *agricultural* about then leaving the standing burnt trees to rot in the forest as the anti-access environmentalists tell you that now resource damage will occur? Yet the very fire that could have been prevented by *good agricultural practice* has destroyed millions of animal habitats. Roads from logging and grazing would have prevented 73% of the forest from burning but the forest service continues dotting to the anti-access groups. Soon there will be no forest left natural or full of old growth.

Now the rains and snow run down hillsides filling our reservoirs with silt from lands now naked of vegetation. Now winds blow the dirt hundreds of miles from the scene of the fire and they claim that salvage will create resource damage. They now demand the forest service to undo the roads used to fight the fire. The very roads that would of diverted blackened waters from making it to our rivers. Roads that could have been converted to water bars now are washed down the hillsides.

I say to you that the US Forest Service is not managing this land, but a handful of enviromentalists are running over the top of you and dictating their one sided views. Making our public comment a farce and pubic land management impossible for the majority of Americans to work or play within the Forest. The works of the anti-access enviromentalists needs to be stopped and the United State Department of Agriculture of Forest Service needs to take back our forestlands and manage them once again.

Man's use in the backcountry is vital to our health and our interaction with nature should be the goal. From working to recreating in the forest should be allowed, not limited by creating more wildernesses. Every time roads, trails and routes are closed to motorized travel within a very few years the anti-access enviromentalists force the forest service to make it a road less area. Shortly thereafter it become a wilderness locking 93% of all citizens from using public lands as we have no motorized access for work or recreation. This process needs to be stopped! Backcountry needs to be established so it can never be closed and every person can visit and work within our forest forever.

Respectively submitted

A handwritten signature in black ink that reads "Randell Drake". The signature is written in a cursive, slightly slanted style.

Randell Drake;

Oregon Executive Director Pacific Northwest Four Wheel Drive Association



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Forest Service Planning Team  
Regional Roundtable Meeting  
Portland, Oregon  
April 6, 2010

To Whom it May Concern:

On behalf of the Stevenson Carson School District #303, Stevenson, Washington, I submit these written comments in addition to whatever dialogue may take place at the Regional Roundtable held today. I appreciate the opportunity to be part of this rulemaking process and to give input into the process by which Forest Service proposes to accomplish land use planning.

The Stevenson Carson School District is the largest school district in Skamania County and the only county school district which includes a High School. The school district comprises a majority of the population of Skamania County and is directly influenced by the economy of Skamania County. Over the last 15 years, Skamania County has witnessed a precipitous economic decline largely due to the effects of declining forest products. This downturn in the economy has had a tremendous effect on the school district from both financial and enrollment perspectives. While the decline was obviously caused by both external and internal conditions, much of this decline seems to have been exacerbated by Forest Service planning rules which seem to have minimized the importance of the sustainability of local rural communities – or so the resulting condition would indicate. Skamania County lost 1,000's of private jobs and over 500 Federal jobs during this period. Over eighty-five percent of Skamania County is in National Forest, so locations and opportunities for developing replacement jobs are slim to non-existent.

Short term economic relief was offered by the Secure Rural Schools and Communities Self Determination Act. But that remedy only addressed part of the school's financial problem. It didn't holistically address community health and "sustainability." It helped our budget, but didn't bring back our students.

In developing the new planning rule, we believe that sustainable, healthy rural communities must be a significant driving principle in creating this new rule. Integrating


social, economic and recreational values into a process that has appeared to have been heavily weighted towards ecological, environmental and bio-diverse considerations should be an important goal of the rule. The rule must address enhancing the human impacts on local rural communities, not diminishing them.

Each forest, each watershed, and each forest-tied rural community is unique and must be considered from a local holistic approach as well as from a regional or national approach. What is good for forest lands and communities in one part of the nation, might not be good for another, and what is good for people in an urban area, may have a serious impact on those in a rural community. If we rely on just what is the "greatest good for the greatest number" we might well cause the extinction of our rural communities.

The school district has programs which integrate the Forest into the classroom and the classroom into the Forest. We are developing the future stewards of the forest through programs like Summer Forest Youth Success, a nationally recognized education and work model for high school youth. This program teaches our students the value of work as well as the value of the Forest itself in our daily lives.

We are hoping that the new Forest Service planning regulations for the National Forest Management Act address the historic and important relationship the Forest has with rural communities and the responsibility of the Forest to continue to provide for the sustainability of those communities and their schools.

Sincerely,



Scott B. Pineo  
School Board Director



Subject: Comments-Region 6 Planning Rule  
From: Betty Jean Keele <bjkeele@epud.net>  
To: <forestservicemtg@LSAresults.com>

Thank you for reaching out for comments on the revisions of the Planning Rule for Region 6.

I would hope that the basis for planning for the future of our forests is to provide healthy sustainable forest and to protect the ecology of the forest.

I see the basic needs planning the forest management, in this order.

- 1) Protect endangered and threatened plants and animals.
- 2) Protect the water for wildlife, fish and people. In Oregon, most towns derive their water from water sheds, lakes, and wells that are often located near rivers. Water inhabitants need protection as much as land inhabitants.
- 3) Provide recreation opportunities to foster appreciation of the National Forests. I am particularly interested in non motorized opportunities. To me it seems you need to be immersed in the sound, smell and weather of the National Forests to understand their importance to the nation.
- 4) Provide a sustainable forest plan for cutting the forest. And the plan should accept the fact that the forests were not being cut in a sustainable manner before the NW Forest Plan was implemented. Currently we are not cutting as much as the plan provided and to my view that is because the forest were so over harvested when the plan was implemented there was no way to predict how small the harvest would have to be to protect threatened and endangered species and to protect the water as we are doing now.

Finally I feel Regeneration harvest (clear cutting) is too detrimental to the forest health to even be considered as a harvest practice. It appears to me to be the antithesis of sustainable forest practices. It takes about 40-60 years, more than the working life of a human to bring the forest back to somewhat maturity after being "clear cut". And it seems to me that when its allowed, humans as we are, seem to forget about calculating that while one "clear cut" in a huge forest might grow back without damaging the total eco-system, when "clear-cutting" was allowed whole forest seem to be in huge patches of trees trying to re-generate. And it also seems that it is a favored practice on steep hill sides where bare slopes can no longer hold back rain. Its clearly a detriment to the watershed below.

I feel the health of the forests reflect the health of the nation. To provide for healthy sustainable forest, all sides of the problem must be

considered. Management plans must reflect the long range health of the forests. Management must look to providing more recreation support as one of the diverse activities to provide jobs. And currently, although many say the forest need more cutting to provide jobs, I feel its time for change in types of forest related jobs. Its the historical evolution of the western commerce, first there were the fur traders, then the gold rush, an now the forest need to slow down their harvest production or we lose too much. Our forests are too valuable to be over harvested. The planning must provide forest sustainable protections, and strong environmental protections.

Thank you,  
Betty Jean Keele  
33485 Hampton Rd.  
Eugene, Or 97405