

Planning Rule Recording Worksheet

Region 2 Roundtable

April 12 Meetings—Lakewood, Colorado

FACILITATOR NOTE: Below is a collection of all of the notes taken during the two Lakewood meetings that occurred on April 12, 2010. If you attended the meeting and feel your input was not appropriately captured, please contact Kristi Parker Celico at 970-262-1341. This document will be posted on-line and also shared directly with the Rule writing team. In the near term, a more formal summary of the meeting will be produced, posted on-line, and shared with the rule writing team.

I. Background

Two meetings were held in Lakewood, Colorado to solicit input regarding that national rule for Forest Service planning. Below is a rough breakdown on the diversity of participants that attended the two meetings:

Recreation Users: 27 participants

Industry Users: 11 participants

Environmental groups/NGOs: 22 participants

Forest Service (regional and national): 22 participants

Other: 40

II. General

1. What would a **GREAT planning rule** look like?

- Mission of the rule should be: A planning rule that works
- Make rule less vision oriented; incorporate less standards and guidelines
- Invest trust in regional foresters and local-level collaboration
- Be transparent about what is and isn't enforceable in a plan
- Eliminate Forest Service agency jargon from rule
- Explicitly note the responsibility of Forest Service to ultimately balance the interests of stakeholders and decide what goes in forest plans
 - Avoid placing decision making burden on local stakeholder groups; Forest Service must make decisions ultimately

- Forest supervisors should be final decision maker re: approval of forest plans because they know the resource the best
 - But only if there is a new appeals process; current process is broken; having a higher-level person within the Forest Service hear appeals does not make sense; leads to litigation because of dissatisfaction with the objectivity of the process
 - The new rule should consider establishing an independent (or quasi-independent) authority to handle forest plan appeals
 - BLM appeal process may serve as a model
- Rule should acknowledge that plans are not started from a blank slate; plans must note existing management decisions that carry over into next iteration/revision of the plan
- Be realistic about Forest Service resources and staff capacity to execute plans
- Forest Plans—Develop at local level based on national guidelines, “compartmentalized” so various parts could be updated individually at pre-determined periods of time.
- Look at the BLM rule as an example
- Keep it simple.
- Resist the urge to mandate at the national level
- Identify “companion designations,” for example mountain biking and many other uses fit together.
- Provide the Forest Service more money generally
- Increase the number of “boots on the ground” in communities.
- The rule should focus on multiple use and sustainable use.
- The Planning Rule should create a simple planning process in order to enable meaningful participation and reduce costs of developing plans (thereby freeing up more resources for projects)
 - Give up on standards and guidelines – some are needed, but don’t overburden the process with standards and guidelines.
 - Use maps to create an overview of existing resources and corridors, and lay out various options for how the land should be used. For example, there is an effort underway in New Mexico under the Galisteo Basin Act/Archeological Sites Act that is using GIS mapping very effectively in soliciting public input and informing planning decisions.
- The Forest Service would look carefully at how it addresses ecological interests, the viability of wildlife and watershed protection.
- Because NFS are public lands, the Rule would allow for as many uses as possible.
- The Forest Service would look at the legal framework under which they operate and serve the public and design the new Rule in accordance with that framework.
- The Forest Service would clearly delineate the planning process, key decision-making points, and the timelines required for making those decisions. Further, they would establish and adhere to benchmarks in the decision making process.
- Would establish measurable objectives and standards, grounded in sound science, for Forest Managers (e.g., for plants, wildlife, etc.)

- Would require that Forests be managed sustainably – assuring sustainable grazing, wildlife, etc. The Rule would address how these things are affected by energy extraction, and allow for adaptive management to respond to changes.
- The Rulemaking process would require that forest planning engage local affected communities and young people who may be responsible for managing our forests in the future. The new Rule would make this engagement a formal part of the forest planning process. Rules and forest plans would consider future generations in their long-term goals.
- Would include strong provisions for the protection of wildlife.
- Accommodate the diversity of use of many forest users.
- Would resolve the ambiguity and ability for broad interpretation of key terms. For instance, the term restoration needs to be clearly defined. We need to know what restoration following the impact of energy extraction means. We need to know whether restoration means returning a forest to its original state (fixing all that was damaged) or to some other sustainable norm (which might be better than before).
- Would allow for the flexibility to use different management tools to respond to large-scale disturbances. It was noted that response to disturbances such as fire, logging, and beetle kill, could represent the opportunity for improving conditions Response to disturbance can be an opportunity (fire, logging, beetle kill, etc.)
- Would include the full mitigation hierarchy, including: avoid, minimize, and restoration.
- Would lay out the process for inter-Agency coordination and cooperation.
- Would encourage communication and collaboration in and across all sectors of interest (e.g., between the Forest Service and the general public, younger generation, among agencies). Effective communication is important for sharing information, avoiding duplication and cutting down on the use of limited and valuable time, etc.
- Would recognize and accommodate the reality that plan revisions/updates and implementation are resource intensive. Associated budgets necessary to meet the new Rule requirements need to play into the picture. The new Rule might address this reality in some way by establishing priorities or a prioritization process the help allocate limited resources effectively.
- Would build adaptation/adaptive management into the planning process.
- Using the best available science (all of the ‘ologists’) in developing the new Rule, forest plans, and actions. Also important is drawing from the wealth of knowledge from people and practitioners ‘on the land’ (loggers, ranchers, etc.) – science is huge focal point throughout the process

- Local involvement/engaging locals is critical in developing the new Rule and in revising forest plans. The ‘top down’ approach has not worked. At the same time, it is important to provide some restrictions to land management that will effectively protect plants, wildlife and watersheds.
- Long-term sustainability of ecology, economy, recreation, etc. should be a theme in the new Rule.
- Frequently used and key terms (like restoration, reclamation) should be clearly defined and used/interpreted consistently.
- The Rulemaking process would require that forest planning engage local affected communities and young people who may be responsible for managing our forests in the future. The new Rule would make this engagement a formal part of the forest planning process. Rules and forest plans would consider future generations in their long-term goals.
- Would lay out the process for inter-Agency coordination and cooperation.
- Forest wide plan needs to be forest wide (may even be too narrow) but beyond also – broad based and Long term assessment – in context of national forest
- The new Rule should require clearly establish benchmarks and measurable objectives in forest plans.
- Keep the rule simple and allow for uniqueness and detail to be addressed at the plan and project levels.
- The new Rule should have broad guidelines and goals, and planning within individual forests should follow the Rule and have the latitude to get to the specifics (e.g., maintaining and managing wildlife corridors). The new Rule may last 20-30 years and should not get bogged down in too much detail. Individual forests should be responsible for identifying their own issues.
- Have healthy ecosystems really at the core
- Would address data gaps. A practical structure is needed to deal with species of concern. This data gap – puts forests in an unworkable situation.
- Clarify where investment in information could be done more collaboratively across states and geography [re: connectivity, etc.]
- Would provide for sufficient information on species diversity. Sufficient information is key.
- Would dictate that monitoring of habitats and populations of concern would not be an afterthought to justify decisions already made.
- Would utilize a science-based approach to identify indicators, habitats and declining species.
- Would have requirements rather than just aspirations on all of the issues listed above.
- Continue to include NEPA.
- Would allow for local flexibility to avoid litigation and facilitate faster implementation of on-the-ground work.
- Would consider the realities of implementation – partnerships and collaboration.

2. What **works now**; what concepts should be carried into the next rule?

- 1982 Rule – plans include clear guidance re: what’s possible in different management areas
- 1982 rule is good in terms of knowing the prescriptions
- Keep 1982 rule management prescription guidelines – helped decision making at the project level
- Desired future conditions element was good too; goals & objectives; standards & guidelines
- Consider incremental changes/revisions/amendments to the existing 82 rule; possibly use 1982 rule as baseline for new rule
- Continue to use all of the 1982 and don’t bother rewriting the rule. Just focus on implementation of the 1982 rule.
- Maintain multiple-use.
- 1982 has good provisions for wildlife.
- Look for the book “Forests of Discord”, and in particular the chapter by Kelsey Alexander. This chapter details the useful parts of the 1982 Planning Rule.
- In general - keep the things that work in the Rule, and focus on changing the things that don’t work.
- The viability provision works and should be included in the new Rule; the new Rule should include some system for looking at the same number species (focal, at risk, other) to monitor/track to make sure slide and listed ESA.
- The public participation process works well, and though it takes time, it is effective. For example, in San Juan, the public participation process around the planning process involved regular meetings and field trips. The relationships developed through that process are long lasting and valuable. The mechanisms used for public engagement are important. Face-time and field trips were essential.
- The Recreational opportunity spectrum (ROS) User Guide idea is good. We may need to tweak it (e.g., update with additional uses), but we need to accommodate recreational uses and the ROS is a good tool.
- Standards (versus guidelines)/must – do work (e.g., 1982 Rule protections for watershed). The standards may need to be tweaked, but they work.
- The environmental management system review seemed to work. It holds companies doing exploration in forests responsible for having a plan that insures site clean-up following exploration.
- The new Rule needs to require an EIS for each plan. The impact at planning level as well as the project level needs to be addressed.

3. What **doesn’t work**; what concepts should be left behind?

- Did not like the very broad aspirational goals in the 2008 rule; too general for project decisions
- Eliminate planning all together since “perpetual planning prevents performance.”
- 82 rule is very economically focused; created extra analysis/work
- Implementation has been difficult with the 1982 rule – new rule should:

- Include sufficient analysis of forest outputs to ensure that they are achievable/realistic relative to USFS resources and staff capacity
- Tie this analysis more closely to ongoing stakeholder collaboration to make sure targets/goals are realistic
- The current planning rule requirements are too complex. The system is broken; implementation of the 1982 rules is too expensive. The level of detail required makes planning expensive and makes it almost impossible for members of the public who are not experts to meaningfully participate.
- In the 2005/08 rules there were no standards – only options. For instance, there were no zoning/designated management areas. The Rule was vague. The new Rule needs to include requirements in the forest plan so the plans provide meaningful direction.
- The “suitability of areas” language resulted in unspecific information and was not useful..
- The 15-year requirement for Plan revision is too short. If the new Rule effectively integrated adaptive management in the planning process, the time between revisions could be extended. The time for timber sales could also be extended.
- Critical land management agencies do not work together effectively (BLM, USFWS, etc.), and as a result, we end up trying to protect wildlife on ‘islands’ of forested land. The new Rule needs to promote cross agency/bureaucratic coordination and support coordinated management of connected lands.
- The Rule needs to more clearly establish what the overarching long-term desired conditions are (whether we want to manage to forested land, grassland, etc.) and what conditions we want to maintain after use. We need greater accountability through standards, and a shorter, streamlined planning horizon. There needs to be a better and more intentional process for building constituencies and engaging people going forward.
- There needs to be a better understanding of the impact of removing or converting forested lands as a result of multiple use and sustained yield, including the reasons for removal and conversion. We need to be mindful of maintaining a balance of interests and considering all aspects of sustainability – ecological, economical and social.
- There is more of a threat from the impact of multiple uses than climate change, so the new Rule should be geared towards that.
- Plans have become more complicated
- Results in loss of flexibility

- How do you address volunteers?
- Plans are too long (pages and time)
- Important to try and hold public attention
- Plans are too constricting
- Too much assessment

III. Plan Content

1. What information and issues do you want to see in a plan?

- The new Rule should include as priorities invasive species (non-native)/weed management and facilitating wildlife corridor movement.
- The new Rule should have as a goal managing to biodiversity. If the new Rule promotes over planning for restoration, then we won't achieve the goals of the Rule.
- Nervous about a lack of specifics, may weaken plans.
- Integrated pest management: definition should be in plan rule
- Specific and binding plans: framework to articulate the values you want to see
- Plans should be geographically specific
- Take into account adjacent lands
- Do you want specifics in the national rule? Locals can address specific issues
- Broad-based at high-level, local specifics
- Measures for protecting watersheds
- Specific directives for incorporating recreational users
- People-up not top-down
- Mechanism for users of property to report/contact someone about issues.
- Rule should require forests to be specific
- Minimal viable populations
- Local forest plans should set designations for recreation, viable populations, wilderness, etc.
- Give topics to address in plans
- Give process to make decisions
- Things to consider in decisions
- Requirements
- Address accountability at the local level
- Build in public perspectives
- Public involvement
- Use best available science, cultural knowledge, technology, commercial
- Provide specific regional knowledge
- How to define stakeholders?

2. Should the planning rule support the creation of a **shared vision** for each planning area? If so, how?

3. Should the new planning rule require **standards and guidelines** in all plans?

- Limit standards and guidelines; less time & resources on planning, and allow more focus on project-level decisions
- Yes, the new Rule would establish measurable objectives and standards, grounded in sound science, for Forest Managers (e.g., for plants, wildlife, etc.)
- Standards of outcomes
 - no mandate for how to meet
 - Use a consistent process
 - Use adaptive management to address changes and emerging issues
- There is a lack of good definitions.
- Plans give the strategy to address issues
- Think about impacts
- Standards
 - Of outcomes
 - Process
 - But local specifics
 - ESA, recreation trends, land-use trends

4. To what extent should the planning rule require **national consistency** and accommodate **regional differences**?

- Rule should outline a core set of components that are national & consistent across of forest service units, along with areas of flexibility to account for local circumstances
 - Need some set of standards & guidelines across plans, especially for any resources that cut across forest service units (e.g. Continental Divide Trail; historic/scenic trails; wildlife corridors, etc) and interface with private lands; forest plans must dovetail with management on adjacent lands
- Balance flexibility with prescription
 - Start things the Forest Service is required to do; make sure Forest Service will be able to do what its required to do over the long-term
 - Structure according to what Forest Service is legally required to do at different scales; break into “smaller bites”

- The new Rule should allow district and forest levels the flexibility to make judgments to address their unique circumstances.
- National prescription versus local control
 - Issues need to be addressed at all levels
 - Ensure objectivity of decision makers
 - Local specifics
- Balance and shared values
 - Leads to better management
- Be aware of substance v. procedure, don't get too clunky
- Learn from what's been done, adjust behavior
- Protect/regulate via procedural guides
 - Where to draw the line
 - Site-specific
- Centralized direction versus local control
 - Tell plans what to consider
 - Specifics at local level
- Public lands: maximum compatibility for access (consider future generations)

IV. Process

Plan Revision and NEPA

1. What are your suggestions for making forest planning **faster, simpler, more straight-forward, and less expensive?**

- USFS should try to simplify forest plans; design strategically so that they dovetail with project-level planning; shorten the planning process
- Simplify language in forest plans as well as the material used to solicit public input
 - Rule include guidance re: use of understandable language in forest plans
 - Create a national glossary of terms and definitions so that forest plans use consistent language throughout country
 - Footnote technical references in plans; will reduce length of document and length of documents
- Potential process steps:
 - Assessment; fairly detailed
 - Forest-level planning; show public management options using maps
 - Make it easier for public to engage and comment; don't force the public to become experts and drill down on details of plans
 - Present in understandable format; incorporate zoning-type aspects

- Then stop
 - Limit standards and guidelines; less time & resources on planning, and allow more focus on project-level decisions
- Why do we need 15 years for forest plan revision? Why don't we set up a framework for plan revision that allows for a different, shorter, streamlined process that does not require redoing the forest plan – adapting to whatever time horizon based on the circumstances?
- There needs to be opportunities to experiment with different processes, use what works, and to learn from each other and other agencies (Colorado BLM land use plan is a good example)

2. How often should **plan revisions** occur; should the entire forest plan be redone in each revision cycle?

- Designate some parts of a plan that will be made “permanent” and other sections on which to focus revisions and amendments
 - Make a provision that plans would be updated every 5 years; complete an update every 10 years, but not re-writing the plan every time
 - Include in the rule when certain pieces of plans will be reviewed/revised, where possible; break down revision process into pieces so that don't have to deal with entire plan at once
- Revisions should be based on benchmarking and how successfully the plan is meeting the marks.
- The Rule should allow for a less burdensome iterative process of plan improvements and updates, for instance to incorporate lessons learned or to reduce inconsistencies in planning and plan implementation within forests and between forests. How can this be done while meeting NEPA requirements?
- The 15-year requirement for Plan revision is too short. If the new Rule effectively integrated adaptive management in the planning process, the time between revisions could be extended. The time for timber sales could also be extended.
- The Rule needs to more clearly establish what the overarching long-term desired conditions are (whether we want to manage to forested land, grassland, etc.) and what conditions we want to maintain after use. We need greater accountability through standards, and a shorter, streamlined planning horizon. There needs to be a better and more intentional process for building constituencies and engaging people going forward.
- Why do we need 15 years for forest plan revision? Why don't we set up a framework for plan revision that allows for a different, shorter, streamlined

process that does not require redoing the forest plan – adapting to whatever time horizon based on the circumstances?

3. What should the rule say about complying with NEPA?

- Rule should articulate that NEPA EIS be programmatic / broad-brush, not site-specific
 - EIS in forest plans should be analytic rather than encyclopedic (though some issues may not be amenable to this approach, such as air quality assessments)
 - Must have a forest inventory, but at a reasonable level of detail; make sure USFS is able to execute (use proxies, maps, etc)
 - ***Watch for rule guidance that conflicts with NEPA; might be okay if the rule is challenged and is found valid because would then establish precedent rather than every forest plan being challenged individually, but still should be cautious
- Broad-brush EIS still requires detailed data to create; the final product doesn't necessarily have to reflect the complexity of what went into it, but details are still necessary to create it so must balance the need for detail with the level of detail in product; must keep in mind what the plan is informing above the project level
- The rule should be general enough to accommodate NEPA and other regulatory requirements (Clean Water Act, Clean Air Act, etc) as well as future changes in those regulations.

Adaptive Management

1. How can a new planning rule build in **flexibility to adapt** to changing science, information or conditions and/or incorporate new data?

- Rule must account for evolving circumstances (environmental, economic, social, etc); build flexibility / ability to adapt into the processes outlined in plans
 - The process for creating a plan is as important as the plan itself
 - Leave some room for uncertainty; allow plans to respond to change
- Rule should build in criteria for what constitutes a “good process”; related to durability; ability/potential to respond to new issues/circumstances
- Adaptive management paradigm
- It is more important to allow species to adapt to change, which is an argument for having minimum requirements (e.g. corridors). Where adaptive management is used – look at past trends to assess adaptive management for; scenarios into the future allow different future.
- Monitoring is an important component of forest management and should be considered in the new Rule. Monitoring allows the Forest Service to use adaptive management to change management practices in a credible way. Monitoring is a way to show whether the management practices used work. Adaptive management based on effective monitoring could provide the ability for the Forest Service to deal with change without having to change the plan.

- Monitoring is expensive and draws from much needed resources to implement the plan. The key is to use monitoring strategically to measure compliance/implementation [did the plan do what we said it would do] and effectiveness [did the plan achieve the intended goals/outcomes such as protecting water] of forest management. The Forest Service could also change its policy to allowing volunteer monitoring to help defray the cost of monitoring.
- Adaptive management – is an effective approach to dealing with lots things but is tough to quantify.

2. When and how should plans be **evaluated** to see if they are working; what should trigger **amendments**?

- Rule must address monitoring and evaluation of plans
- Plan approval reviewed at national level for compliance.
 - There needs to be a higher standard of excellence before lawsuits are filed
 - Get decisions closer to the ground
 - Think about non-local users also
 - A burden of proof is required

Collaboration and Coordination

1. How should **stakeholders, other agencies, and governments be involved** in the planning process?

- Process & stakeholder engagement - engage early and throughout process; need buy-in; then less likely to have challenges later
- Utilize ongoing collaboration with stakeholders to deal with complexity
- Re-orient process to vary timing of stakeholder involvement & decisions on different parts of plans
- Mechanisms & forums for public participation at the local / forest level:
 - Field trips; tangible for local people; consider videotaping trips and archiving online so that public can view
 - Public meetings; prioritization exercises
 - Avoid drawn-out public process; leads to stakeholder burn out
- Consider utilizing a steering committee with work groups process to develop forest plans; local work groups on specific issues
 - Must be streamlined & rapid pace to keep up with evolving/changing issues
 - BLM citizen-based Resource Advisory Councils offer potential model
- Clarify scale and what we're trying to assess with inventories
 - Partner with other landowners and land management agencies; collaborate across property lines & jurisdictions
- Focus on local-level public involvement; use tools like maps to engage stakeholders; create timelines with accountability mechanisms to keep process moving
- Difficult for the rule to guide how to work with adjacent landowners because USFS is only responsible for FS units; maybe not an appropriate thing to include in the rule

- But it may be possible for USFS to learn from successful land management models of stakeholder collaboration across jurisdictions
- Forest supervisors should decide what a good plan is, not the regional office; but forest supervisors need oversight (checks & balances; time frames) because they're not all great
 - A good plan is ultimately judged at the local level; local communities should have the greatest say
 - Tension between collaboration to build buy-in and slow pace of process; need to speed it up
- Plans reviewed for compliance at regional level and changes approved by regional commissions made up of regional USFS manager and members from stakeholder groups.
- Need to have formal coordination with other jurisdictions. Perhaps consider making local government and other entities as formal cooperators.
- The rule should require an updated notification system for identifying and notifying stakeholders. Ideas include: using email and the web, develop a notification list that groups can put their name on, calling people.
- Use or build upon local planning processes. Have Forest Service staff go to local planning meetings. Borrow local stakeholder lists. Designate local governments as cooperators. Reflect local planning and transportation systems in the Forest Service plans.
- Job descriptions for Forest Supervisors should require skills of community outreach and ability to work with stakeholders.
- Rule should have a process for how to engage the community. The rule should identify a desired outcome.
- The planning process must be simplified so as not to exhaust the public.
- Stress the importance of local partnerships to develop plans.
- USFS should go beyond current approaches to “collaboration” (i.e., public meetings and stakeholder dialogue). There are many affected stakeholders who won't show up at meetings. USFS should anticipate which interests will be affected and be pro-active about engaging those interests.
- The Rule should address the use of public groups (i.e., not-for-profits) playing a greater role in plan or project implementation. Currently, the options for implementation seem to be that either the government agency or a private concessionaire implements (part of) projects. There are many not-for-profit groups that have capacity, resources, and interest in implementing projects. For instance, the rule could expand the scope for the types of partners that qualify for “stewardship contracts.”

- Collaboration with other agencies responsible for land management is important and should be a requirement in the new Rule.
- Don't compartmentalize uses
- Bring people together to share forest lands
- Find respect and understanding
- Include both users and those who want no use
- Assess what there is start, where there is understanding, then focus on the disagreements

- Experiences are not available to everyone: think about education on forest and planning issues
- Develop a sense of ownership: stakeholder groups educate their members
- What about a collaborative Board that meets regularly (Consistent public input)?
- Remove ideal of competition for resources
- Give it money and decision making authority
- Shared Understanding
- Collaborative Board
- Education
- Customization
- Helps us adapt to others
- Use neutral third party facilitators
- Balance all of the issues and stakeholder interests
- At the lowest level possible
- How do you address in a rule? Who decides? Who approves?
- There are few national mandates, issues are local and regional, the mandates occur at those levels
- How do you ensure objectivity of decision-maker(s)
- Protection at national level
- Board of Commissioners: Advisory board only, make-up, size, rules mandated by rule
- Some things are regulated/protected nationally
- Species diversity, viability, roadless areas, recreation use is evaluated (specific direction)
- Economic use vs. economic benefit: define the difference, consider social and economic benefits
- Benefits are more local
- Define in rule and economic analysis
- Other considerations are local: rule defines the process
- National regulation/prohibition may impact management
- Substance vs. procedure: too much substance may slow us down
- There are shared values among all groups
- Be aware of fragmentation
- Lens of collaboration
- Don't set yourself up for conflict
- Compromise should go beyond the mediocrity of the middle
- Identify what is successful, use for management elsewhere

2. What kind of **administrative review process** should be offered to the public in the planning rule? (E.g. pre-decisional objections and/or post-decisional appeal processes?)

- The current appeals process is broken and probably contributes to the litigiousness and contentiousness of planning processes.
- It is currently very easy to hold up the implementation of a plan by simply filing an appeal.
- The appeals process that goes up the internal decision-making chain is not independent enough.
- Create an appeals process that is: more formal; independent; engages substantive expertise in a meaningful way; allows for specific parts of a plan that are under contention to be reviewed while not holding up implementation of other parts of the plan; and (related to the previous point) allows for a decision early in the process as to whether the gravity of a complaint should stay/not stay a plan from going into effect.

3. Should the forest planning process move to an **all lands approach**? If so how?

- Although the concept is good, the time and budget required to do this seem challenging.

V. Substantive Topics

Restoration

1. How can the next planning rule foster **restoration** of NFS lands?

- The rule should have plans plan for disturbances and take advantage of them.
- Restoration differs for different things; restoration of the impact of bark beetles takes many years, whereas restoring the impact following energy exploration wells may be substantially shorter (2 to 3 years).
- Not all forests need restoring. The new Rule should be broad enough to identify restoration needs, but also recognize that not every forest needs restoration in the plan (e.g., oil = reclamation not restoration).
- A forest plan needs to establish a plan to manage to the desired condition no matter what. The plan should not get bogged down in addressing the specifics. Restoration means going back to what it was, and this may not be a necessary condition. The desired condition may be restoring to native or natural condition which may change as a result of climate change.

- There are differing opinions of what is a natural forest – how far back do you go to achieve a natural forest.
- At a minimum – the new Rule should require restoration projects to utilize rigorous scientific standards to restore ecosystem services, promote biological diversity, and protect wildlife.
- The time involved with restoration is key consideration when planning restoration, as some restoration may not be feasible or realistic within unrealistic timeframes.
- The Rule should set sideboards for a planning process which allows forest planners to react to different circumstances. The new Rule should consider restoration, but should not mandate restoration. Mandating restoration would be a mistake because we might end up restoring the forest to something we do not want.
- The cost of restoration is huge. It is better to err on the side of caution and build into the new Rule the importance of managing to protect and keep in place corridors. ‘Passive’ restoration is cheaper.
- The cost of forest restoration is not addressed in the planning process, and the cost is significant. How can/can the Forest Service fix this paradigm – start/review/finish?
- In considering the cost of restoration, it would be helpful to know the extent of the Forest Service’s authority, and whether it has purview over habitat, animals, etc.? The new planning Rule could include more explicit information on what is necessary to make decisions regarding restoration, climate change, corridors.
- The new Rule should not allow change as much as possible to reduce the need for restoration.
- Historically, in the restoration of forestlands, the concept of sustainability has been translated into yield. Restoration is more about variability; how systems/ecosystems work and change. Dealing with that change is extremely hard.
- It is important to have historical context, but it is also important to allow for flexibility in the approach to management as forest conditions change and the ability to take into consideration new knowledge.
- We can’t manage for just one “right” thing. We need to adopt our mindset to accommodate the values to which we manage.
- We need to get out of the way and allow the Forest Service managers to do their jobs. They generally know what needs to be done.
- Restoration may not be the right word. Resiliency may be a better word. Ways to encourage resiliency at the Rule level include:
 - Identifying core areas

- Identifying stressors
- Figuring out how to remove stressors

Once these factors have been identified then allow flexibility for how the forest managers accomplish this.

- There is a need for minimum requirements.
- Restoration should be founded on figuring out what was there – tying restoration to resiliency. It may be necessary to make assumptions about what ecosystems were.
- Restoration should not be a ‘pie in the sky’ concept of getting back to something in past. It should include ideas of what we want in future to guide what we are doing – and include resiliency.
- Active management by the Forest Service is a necessary part of restoration. But there are problems with maximizing local flexibility of all costs. There should have accountability at the Rule level for resiliency and connectivity – especially in face of climate change. Need redundancy and connections at a large scale.

- Ecological
- Natural processes (natural fire)
- Broad and diverse ecosystems
- Other topics flow from ecological restoration
- Where do we restore to?
- Travel management is inter-related
- Take into account climate change
- Adaptive management with specific measurements/triggers
- You can’t go back in time, so go to adaptive management
- There is a human aspect
- Study wilderness areas, don’t just add, look at impacts on recreation
- There could a percentage cap for wilderness levels
- Think about maintaining at sustainable levels
- Money is a consideration

Climate Change

1. How can the planning rule be proactive and innovative in addressing **climate change adaptation and mitigation**?

- Restoration in the context of climate change is not necessarily appropriate for the new Rule to cover.

- The Forest Service can't do a lot about climate change – accept make sure we have healthy forest to take up carbon.
- If climate change is addressed the new Rule, it will be important to consider specialized species to monitor correctly.
- Because we do not know what the impact of climate change is/will be, it will be necessary to try and discern the impacts of climate change from other human impacts - identify which plants in which ecosystems will be affected by climate change (e.g., availability of water to hydrate) and identify human stresses also impacting the ecosystems (e.g., logging) - then allow the forest plan to reduce the different stresses.
- Not certain how the new Rule can address unknown changes resulting from climate change. We can't plan for or affect the impact of climate change through the new Rule. To adjust, we may need to reevaluate the planning horizon.
- Instead of having the new Rule focus on climate change - changes which are tough to measure directly on-the-ground - why not refer to changes in land use or something else that can be more easily measured, like the functionality of ecosystems?
- If we adopt a shorter plan revision timeline, we will effectively 'disallow' the function of the plan. Having a longer planning cycle with discrete standards would be more appropriate to effectively measure change.
- If we manage to address the impacts of climate change, we will be managing too many things. Trying to manage too many things may open the door for litigation. Climate change is a phrase that is over-used and is the fall back to address/explain any change.
- I am troubled by the Chief's emphasis on dealing with climate change in the new Rule which is not definable, and prefer ecosystems.
- We have to be able to look at the Forest Service contribution to what is happening at larger scale, because that's the way ecosystems work.
The different scales to consider include:
 - Regional
 - Next door neighbors at subregional scale
 - Forest Service boundaries
 - Project level
- Instead of requiring a huge painful process of forest plan revision every 15 years – approach the plan revision process in more manageable bites more frequently. It is not possible to do much at the unit level about climate change. We need to look at the role of forests in the future - think more rigorously about change over time. We will need to deal with the stressors on the landscape over the next 20. We need to make better decisions today about these stressors now, and do a better job of addressing them

- It is helpful to work with other responsible agencies when looking across landscapes. The Forest Service has to look at how it fits in with other agency adaptation work. It is challenging from state to state perspective to see how each state fits into various efforts.
- The Equilibrium Principle (shot lease process? S.p.) Mother Nature responds. The climate is always changing – and never reaches equilibrium. People are part of the process as well. By the very nature of what we do we are causing local changes. Flexibility is important. Concentrate on taking care of the pieces of land we each care about. There is not just a single used of ground – there can be multi-uses. In the National Rule – get away from single use designations to MUSI.
- With more and more people we have a greater need to look outside of our borders. Remember counties and municipalities have huge authority over land management.
- There are a lot of changes occurring without respect to climate – as a result of human impacts. We need basic good planning principles rather than referring to changes not sure about (e.g., possibly resulting from climate change).
- Does climate change need to be included in the new Rule at all?
- It is important to protect the CO₂ sequestration capacity of old growth forests.
- Even if we don't know impacts of climate change – having resilient forests can help. Landscape connectivity is very important. Maintaining connectivity allows animals to migrate.
- Climate change does need to be included in regard to water quantity – in Colorado, forests are critical to the health of watersheds. We need flexibility to adapt to warmer/dryer conditions. The Rule should not dictate how to respond to climate change, but enable the flexibility to adapt to change.
- We need to have a Rule that encompasses all of the issues: climate change; plants and animal diversity, watershed protection. Populations are different now than even 10 - 15 years ago. We need a template that allows us to go forward with restoration and resiliency.
- Note, however, that allowing flexibility can also create possible conditions for litigation.
- These issues have to be dealt with on large scale, integrating regional guidance.

2. What, if any, climate change **assumptions** should be used in the development of plan alternatives?

Water Resources and Watershed Health

1. Should forest planning be conducted in the context of **watersheds**? If so, how?

2. What if anything should the rule say about **water availability and quality**, including factors outside of the Agency's control?

Diversity of Plants and Animals

1. At what landscape scale and how should the Forest Service analyze and provide for **diversity of plants and animals** (individual unit, watershed, landscape scale)?

- Rule should include guidance re: coordinating with state wildlife agencies to reflect their objectives and goals
 - Like the 1982 viable population requirements
 - Specific clear direction, binding
 - Should be the bottom floor
 - Use indicator species
 - There is already a government agency that addresses at-risk species
 - Address through USFWS
 - FS required to ask FWS for input
 - Washing station to stop invasives
 - More importantly address invasive species
 - ESA, American Wildlife Heritage Act, work with existing laws
 - Think about migration corridors and wildlife sanctuaries, work with state wildlife agencies
 - Roadless areas, maximize
 - Think about all players and engage to create migration corridors
 - Wildlife easement
 - How do you cooperate with other agencies?
 - What do you say about landscape cooperatives? Need to be leveraged and worked.
 - There needs to be a balance between collaborative input and public input

2. How should the planning rule guide monitoring and protection of **at-risk species** of animals and plants and their habitats?

Contribution to Vibrant Local Economies

1. What should the planning rule say about the **provision of goods and services** (including ecosystem services) that contribute to vibrant local, regional, and national economies?

2. How can the planning rule reflect the **interdependency of social, economic, and ecological systems** in a way that supports sustainable management of national forests and grasslands?

- The starting point for the rule should be humans and how humans use the forest.
- Economics and recreation on FS land are intertwined.
- Emulate how BLM plans for minerals.
- All activities on the land should be determined based on the net present value they provide. Benefits must outweigh costs.
- Rules should require local socioeconomic analysis.
- When certain uses or projects are permitted (e.g., a logging concession), long-range planning should include earmarking of funds for post-project restoration.
- Often, projects have long time-frames. A road that is put in to allow access for a specific activity may over time become used by others for recreational or other purposes.
- In the past it has often been difficult to close or reclaim a road once the specific activity has ended. And, often the resources are not available to reclaim a road (or other site) after the project has ended.
- It seems that Forest Service management paradigms have been shifting to better plan for post-project reclamation. This paradigm shift should be reflected in the new rule.

Use and Enjoyment of NFS Lands

1. What if anything should the planning rule say about **suitable uses** and/or **places of interest**?

- The rule should include principles regarding the preservation of cultural resources. It is not sufficient to leave the identification of and planning for cultural resources to project-level implementation. Some overarching principles should be included to ensure that planning efforts are aware of existing cultural resources and take those resources into account during the planning process.
- Specific language for a new rule has been suggested by National Heritage in a letter submitted during the NOI comment period.
- In defining suitable uses, must plan for technology. Design of recreation equipment is changing all the time.
- Special recreation areas should be designated where opportunities are unique.
- Inventories – to help focus planning efforts, the first step should be to develop inventories of existing resources, whether cultural, ecological, or other. These inventories don't have to be detailed, as long as they provide enough information about existing clusters or concentrations of resources to allow planning efforts to take these concentrations of resources into account. More

detailed analysis can then be carried out for specific projects in a focused manner.

2. What should the planning rule say about recreation access, visitor facilities, and services?

- These should be based on local decisions.
- Require a needs analysis and require the plan to act on the needs analysis.
- Ensure that the plan requires a budget to support facilities over time.
- All plan requirements should include a fiscal sustainability analysis.
- Sustainable recreation
- Clearly define multiple use: is there a level of multiple use (geographic/percentage, forests vs. USFS level)
- localize, define at a local level – split forests if necessary
- Lay person should be able to understand
 - Make things a lot simpler
- Management needs to be consistent and congruent (for recreation and economic interests)
- Should be process-oriented: guidance/parameters for forest plans
- Flexibility and localization vs. consistency across forests: how do you balance?
- Develop an alternative that emphasizes multiple-use
- Develop an alternative that maximizes ecological resources protection
- Will build the broadest decision space possible
- Rule should identify possible uses; plans should identify uses for forests
- Use sub-categories and examples
- Local decisions
- Citizens are stakeholders
- Education of stakeholders
- Seek balance
- Capture local knowledge
- Lands are national lands
- Inherently messy
- Public has role in decision making
- Work together
- Public has “skin-in-the-game”
- Find a way to quantify “passive uses,” i.e. via mail surveys

- There can't be boundaries on stakeholder processes
- Require a process for taking comments/complaints
- Use to track stakeholders
- Use member groups for outreach
- Require that the stakeholder process is collaborative

Other Comments and Suggestions regarding Economics and Recreation

- Consider companion designations. Identify compatible uses for land use.
- The rule must provide clear direction on how to manage recreation. It should define a strategy.
- Experiment on how to concentrate human use in different areas.
- Do not let majority rule between user groups. Minority uses (e.g., shooting ranges, horseback riding, airplane fields) are being pushed out. Allow for diversity.
- Recreation should be a high priority in the rule.
- Restoration of the forest and recreation must go hand-in-hand. One provides budget for the other.
- Look at BLM approach for ensuring multiple use.
- The key must be multiple use and sustainable use—but the key is quality of human use, not just quantity.
- Noise is a factor that ruins many experiences. The rule should have plans account for the noisiness of various activities.
- Recreation activities must be allowed based on balancing the demand of use and the carrying capacity of the land.
- The rule must require that plans recognize current binding obligations such as ski resorts and mining. Plans should also recognize historical uses.
- The rule should have plans evaluate likely human use trends over time.
- The rule should encourage plans to engage youth and communities to help build ownership.
- Plans should start with the concept of a multi-use option and a study of who is using the land now.
- The rule should define appropriate outcomes for recreation user—not dictate specifics.
- Plans should allow for different levels of disturbance in different areas.
- Market and non-market recreation uses should be included.
- Recreational access is critical to the planning process

- Owners: national citizens need to have input, local stakeholders shape regional policy
- Figure out ways to work together
- Consider groups that are not accounted for
- Democracy only works if public is informed
- Need for stakeholders to be prioritized, engaged, and informed
- Careful of some that are heard more than others

Other Topics:

- Consider as a potential model for developing the new Rule the process used to develop the International Green Construction Code (IGCC). Similar challenges faced – developing a rule that could apply in different countries under tight time constraints – 30 person committee developing a new building code – weekly conference calls
- Surprising commonality among different viewpoints – accentuate them
- Weed-free feeding for domesticated animals
- Manage for indicator species will address many other issues
- Protect eco-systems by matching tolerance for disturbance with allowed activities
- There are a lot of things in common – how do we find this?
- Budget neutral – needs drive the budget
- Protect in-stream flows in forests
- Where is energy development (including transmission lines) appropriate?
- Find a happy median around certain points; think of the majority of users.
- Education
- Plans seem independent of the budget process; it is important to connect objectives to budgets.
- How will the role national forests play in the provision of public goods such as ecological services be evaluated?
- How will those public goods be identified?
- How will the value of those public goods be measured?
- How will the non-timber biodiversity of national forests be cataloged? I'm especially concerned here about microbes and fungi.
- How will any intellectual property derived from research based on national forest biodiversity be shared?

Region 2 Roundtable – Plan Process & Amendment Issues Breakout Groups

- How will prior arts, i.e., traditional Indian medicinal, nutritional, and other uses of national forest resources be identified and cataloged?