

National Advisory Committee for  
Implementation of the National  
Forest System Land Management  
Planning Rule

- Mike Anderson, *The Wilderness Society*
- William Barquin, *Kootenai Tribe of Idaho*
- Susan Jane Brown, *Western Environmental Law Center*
- Robert Cope, *Lambi County Commissioner, ID (Ret.)*
- Adam Cramer, *Outdoor Alliance*
- Daniel Dessecker, *Ruffed Grouse Society*
- Russ Ehnes, *National Off-Highway Vehicle Conservation Council*
- James Magagna, *Wyoming Stock Growers Association*
- Joan May, *San Miguel County Commissioner, CO*
- Peter Nelson, *Defenders of Wildlife*
- Martin Nie, *University of Montana*
- Candice Price, *Urban American Outdoors*
- Vickie Roberts, *Shelton Roberts Properties*
- Greg Schaefer, *Arch Coal, Inc. (Ret.)*
- Angela Sondenaa, *Nez Perce Tribe*
- Rodney Stokes, *Michigan Governor's Office (Ret.)*
- Christopher Topik, *The Nature Conservancy*
- Thomas Troxel, *Intermountain Forest Association*
- Ray Vaughan, *Noted Author and Raconteur*
- Lindsay Warness, *Boise Cascade Company*

March 4, 2016

Tom Vilsack  
Secretary, Department of Agriculture  
1400 Independence Ave., SW  
Washington, D.C. 20250

Thomas L. Tidwell  
Chief, U.S. Forest Service  
1400 Independence Ave., SW  
Washington, D.C. 20250-0003

Dear Secretary Vilsack and Chief Tidwell:

As you know, the National Advisory Committee for Implementation of the 2012 National Forest System Land Management Planning Rule (the Committee) held its fifth meeting of the new charter from January 14-15<sup>th</sup> 2016 in Sacramento, California. This memo summarizes the key discussion points and outcomes from the January 2016 meeting with the goal of maintaining regular communication between the Committee and executive leadership of the Department and Forest Service.

We believe that the Committee and its work are at a critical juncture, and that several formal recommendations are forthcoming. To that end, we invite you to attend our next meeting in March 2016 (March 8-9, 2016) where we can jointly discuss our ideas and develop a path forward. In particular, we are taking your challenge to think outside the box seriously, and expect to have several “pilot” concepts ready for discussion at our meeting. While not immune from risk, these innovative approaches to forest planning would require bold action on the part of the Forest Service, but hold promise for effectuating the important paradigm shift embodied in the 2012 Planning Rule.

We hope that you will be able to join us in March, as your perspectives will add much to the conversation.

**Planning Efficiencies.**

Forest Service leadership shared with the Committee your desire to complete the land management planning process with 3 to 4 years of commencement, a goal that many Committee members share. However, all members believe that the importance of getting forest planning right and having well-developed plans is more important than meeting a particular deadline. We encourage the agency to view

planning from a life cycle perspective and to recognize that time spent at the front end of the forest planning exercise will expedite forest *and* project planning in the long run. Also, this approach is much more likely to result in solid relationships between the Forest Service and the public the agency serves, if time is taken to build and sustain those connections.

Committee members identified a number of ideas to improve the planning process that we expect to develop into formal recommendations, including:

- Inviting external stakeholders to join ID Teams (tribes, governments, NGO's and others);
- Creating a focused "swat ID Team" approach that would enable deployment of specialists when needed in the planning process;
- Encouraging forests to develop a decision framework, outlining methodological protocols in order to facilitate partner contributions to data collection;
- Engaging private sector planners to help the agency create an organization that is more prepared for forest planning;
- Creating focus groups with private citizens around a forest plan prior to planning;
- Ensuring thoughtful sequencing of forests ready to engage in planning in order to create efficiencies;
- Establishing placed-based FACA committees for plan revisions; and
- Setting up a "Region 7" exercise that allows planning teams to experiment with developing plan components in a risk-free environment (see Adaptive Management and the Role of Plan Components, below).

### **Adaptive Management and the Role of Plan Components.**

The Committee continues to work through the challenging issue of integrating true adaptive management into the planning process, and the corresponding role of plan components. Some Committee members believe that numerous, discrete Standards and Guidelines are vital because they are the only "enforceable" plan component that provide regulatory certainty and accountability, and point out that forests that do not make frequent use of Standards and Guidelines may pay a drastic social and implementation price later through increased public distrust, litigation, and project-level planning delays. Conversely, other members expressed concern that in the past some plan components were not based on the best available science or limited a forest's flexibility to address management challenges, whereas the 2012 Rule's inclusion of Desired Conditions and Objectives as required plan components give the Forest Service the flexibility it needs to address changing ecological and social demands.

Despite this apparent difference of opinion, the Committee unanimously agreed that plan components need not be a zero sum game, and that there are points of common agreement such as:

- The Forest Service must be clear and transparent in the development of plan components, and involve the public in the process for drafting plan components;
- Effective monitoring of plan implementation to determine the efficacy of plan components is imperative;
- Plan components – particularly Standards and Guidelines – must be well-constructed and based on the Best Available Scientific Information; and

- The Forest Service would greatly benefit from training on how to develop a suite of effective plan components.

To effectuate these observations, the Committee is particularly interested in engaging the Regional Planning Directors in a scenario-based exercise in the fictitious Region 7 that would allow planners to experiment with infusing adaptive management into the development all types of plan components in a no-risk environment. We hope to implement this workshop around our July 2016 meeting (scheduled for Portland, Oregon).

### **Wilderness.**

The wilderness working group explored what activities are appropriate to initiate before the Assessment phase of revision, and agreed that this work should be limited to information gathering, relationship building, and public outreach and education: wilderness inventory work can begin prior to the start of the Assessment, provided there are adequate opportunities for public and governmental involvement. Evaluation should not occur until after the Assessment. When the Forest Service is unclear about what information is being gathered when and why, many public stakeholders perceive that decisions are being made when in fact they are not; and this often contributes to public distrust of the agency and the entire planning process. This working group is preparing formal recommendations that encompass these lessons learned, and hopes to finalize them at our March meeting.

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### **Species of Conservation Concern (SCC).**

Perhaps one of the more challenging topics the Committee is addressing involves Species of Conservation Concern (SCC), particularly issues associated with the sequencing of the selection of SCC, the balance between local discretion and national consistency in designating and addressing SCCs, and the relationship between the agency's Chapter 2670 sensitive species policy with the SCC process. These are all issues that the Forest Service is also struggling with internally.

The SCC working group will conduct stakeholder interviews in February to compliment the agency's ongoing internal review of the SCC process, and will gather and discuss examples of plan components that adequately addressed SCC issues and components that could be improved. Using the information gathered from these efforts, the working group will develop formal advice for consideration at our March meeting on the following topics:

- Public engagement and transparency in the SCC process;
- Clarifying the definition of critical terms;
- Addressing SCCs in the monitoring transition process;
- The use and documentation of BASI;
- Harmonization of the Forest Service's Chapter 2670 policy on sensitive species with SCCs;

- The balance between local discretion and national consistency in SCC identification and management; and
- Harmonization of the identification of SCCs and the rest of the planning process. For example, the public needs to see the rationale of inclusion/exclusion of SCCs prior to commenting on plan alternatives, while at the same time the Committee is cautious of

requiring additional comment periods. A potential path forward may be a recommendation that the rationale be released as a part of scoping.

**Public Outreach and Engagement.**

The Citizens’ and Government Guide working group chairs are keen to complete and publish the guides, for which there is growing demand among the public and governments. They are working with the agency to finalize the texts, and expect the draft guides to be posted to the Forest Service’s FACA website as soon as the clearance is complete (estimated date is mid-March). The final print date is estimated to be the end of April. The guides will be updated and refined by the agency on an on-going basis.

The Committee continues its oversight of the implementation of our March 2015 recommendations to you regarding the agency’s transition process for Forest Service leadership and forest planning team members, and has proposed that those recommendations be shared with each forest that is commencing the revision process as part of an orientation package during initial conversations between the forest planning team, Forest Supervisor, and Washington Office EMC staff.

**Conclusion.**

As you can see, our Committee is very busy working through a myriad of topics in our quest to “*learn locally and advise nationally.*” As we approach the end of our second term, the Committee remains highly motivated and engaged in addressing the challenges of land and resource management planning across the National Forest System. We are on the cusp of several recommendations that we believe will assist the Forest Service in effectively implementing the agency’s 2012 National Forest Management Act Planning Rule, and we look forward to sharing this advice with you at our March 2016 meeting.

We also wish to again commend your staff in their work to aid this Committee in implementing its charter. From travel logistics and meeting preparation, to brainstorming and problem-solving, we have been impressed by their openness and willingness to work with our group of diverse citizens to improve the forest planning process. We are more effective because of their thoughtful participation and engagement.

Sincerely,



Susan Jane Brown  
Co-Chair



Rodney Stokes  
Co-Chair