

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, *Blue Mountains Forest Partners*
- Robert Cope, *Lemhi 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.*
- Angela Sondenaa, *Nex Perce Tribe*
- Rodney Stokes, *Citizen-at-Large*
- Christopher Topik, *The Nature Conservancy*
- Thomas Troxel, *Intermountain Forest Association*
- Ray Vaughan, *Citizen-at-Large*
- Lindsay Warness, *Boise Cascade Company*

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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:

The National Advisory Committee for Implementation of the 2012 National Forest System Land Management Planning Rule (the Committee) held its seventh meeting of the second charter from May 9 – 12, 2016 in Charleston, South Carolina. The majority of the members have served on the Committee since 2012, making this our fifteenth meeting together. As this Committee’s membership draws to a close (our membership expires in September 2016), we are increasing our efforts to assist the Forest Service in successfully implementing the 2012 Planning Rule, and have several highlights that we would like to share with you.

Measuring Success: The Francis Marion National Forest.

To set the stage for our meeting in South Carolina, many members of the Committee joined Francis Marion National Forest staff in the field with other stakeholders to learn more about forest plan revision challenges and opportunities. Committee members were impressed by the candor with which Forest Service personnel discussed the difficulties of forest planning in the modern era, especially given the challenges of exploding urban growth and the need for increased use of prescribed fire to meet ecological and wildlife needs. The Committee appreciates the substantial work that went into arranging

the field tour, and wishes to thank the staff of the Francis Marion National Forest and the Region 8 Regional Office for helping us to “learn locally.”

Similarly, we wish to recognize and commend the Francis Marion National Forest for successful release of its draft revised forest plan! As the first national forest in the country to revise its forest plan under the 2012 Planning Rule (and *draft* Directives), the Francis Marion was tasked with navigating a changing regulatory climate given the new substantive and procedural requirements of the new Rule. The Committee believes that the early learning that resulted from

the Francis Marion’s experience will help other national forests with the revision process, and has assisted the Committee in its role of “advising nationally.” We look forward to hearing more from the Francis Marion as the forest moves towards final implementation of its new forest plan. Congratulations!

Amendments Utilizing the 2012 Planning Rule.

As you know, the Rule embodies a framework of adaptive management that depends on monitoring, learning, and adaptability in order to ensure that forest plans reflect the needs and desired outcomes of the National Forest System and the American people. Indeed, ensuring that this process functions as intended was one reason many members joined the Committee initially, and has energized still other Committee members to offer their continued service past 2016. As the Forest Service and the public gain experience with the new Rule and its amendment provisions, it has become clear to the Committee and Forest Service that additional guidance and recommendations may be necessary to ensure that the Rule functions as intended with regard to plan amendments. In the short-term, we expect to work with agency leadership to provide feedback on proposed regulatory guidance regarding the appropriate scope and scale of amendments, and in the long-term we expect to develop recommendations pertaining to the transparency, justification, and timeliness of amendments under the 2012 Rule, among other work.

Plan Components Workshop.

The May meeting provided the first opportunity to hear back from Committee members that developed and used a Plan Component Observation Tool to review the Francis Marion DEIS/Draft Plan. Much like the Committee’s tool developed to assess the assessments, this tool is organized around the Rule and directive’s language, and is intended to facilitate an empirical approach to understanding whether plan components are developed in a manner that is consistent with the Rule and Directives.

As part of the Committee’s response to the Chief’s Challenge to think innovatively about planning and federal forest management, the Committee is working with Forest Service staff to develop a “Plan Components Workshop” to simulate a forest plan revision exercise in a risk-free environment. This workshop will facilitate peer-to-peer learning within the Forest Service and Committee members by encouraging workshop attendees to share examples of plan components that have worked well in the past, as well as examples that leave something to be desired, and to work together to develop plan components for a fictional National Forest in Region 7 that addresses conflicting uses of the national forest – just as planners must do in “the real world.” Because the 2012 Rule is much different than prior rules, the Committee believes that all parties will benefit if workshop participants can run through real-world scenarios and experiment with crafting plan components without the pressure of a live planning effort. Indeed, we hope to learn from the agency’s recent “Lessons Learned” workshop in Ft. Collins, Colorado in May, and perhaps incorporate some of those lessons into the Plan Components Workshop in September, around the Committee’s meeting in Washington, DC.

Monitoring Transition: Plan Monitoring Plans.

36 C.F.R. § 219.12 requires all forest plan monitoring plans, except for forests already in revision, to be modified to meet the requirements of the 2012 Rule. Most national forests have completed this transition, and others are nearing completion of their updated plan monitoring plans. Several Committee members engaged in this process on their forests of interest voiced concerns about the process to update monitoring plans, in particular transparency and public engagement, and will be discussing that process further with agency personnel. The workgroup may formulate recommendations addressing public engagement and transparency in the monitoring transition process.

Forthcoming Recommendations.

The Committee has been working on recommendations regarding the Wilderness inventory, evaluation, and assessment process, as well as observations on promising practices for public engagement. At our meeting in South Carolina, the Committee finalized recommendations and observations to improve public engagement in the planning and wilderness processes. These recommendations and observations will be provided to you under separate cover.

As part of the Wilderness work group’s deliberations, the group heard from Liz Townley from Region 4. Ms. Townley provided the group with several graphics and work products that she had developed for the Wilderness inventory, evaluation, and assessment process in Region 4, which the working group believes provide a good example of how to clearly explain a difficult and controversial topic to stakeholders. Committee members were also impressed by Ms. Townley’s open and transparent manner, and wish to commend her for her willingness to discuss the challenges, solutions, and innovation she has experienced during the revision process.

The Committee is aware that many members of the public and Forest Service staff are struggling to maintain the open communication emphasized within the Rule during the National Environmental Policy Act (NEPA) process. Many stakeholders have voiced frustration over too little communication (the agency going into the NEPA ‘black box’) while agency personnel express concern with not wanting to prejudice the environmental review process. At our May meeting, Forest Service leadership shared that the agency is in the process of preparing guidance for the field on this issue; the Committee looks forward to working with the agency to review this information and to develop additional products and recommendations as appropriate.

Species of Conservation Concern.

One “gnarly issue” that the agency has tasked the Committee with investigating and addressing is the Forest Service’s need to meet the requirements of the 2012 Planning Rule for Species of Conservation Concern (SCC). The SCC work group commends the Forest Service for its leadership on the SCC issue, the decorum with which agency staff have consistently engaged with the work group on this challenging and important issue, their willingness to investigate and understand policy implementation challenges, and their cooperative spirit in working with the Committee to articulate and solve policy challenges. We expect to work with the Forest Service on the development of several forthcoming white papers that will be distributed to leadership and

line officers within the agency, which will also help the public better understand the SCC process. We also expect to dive into additional larger policy issues, including the use of the Best Available Scientific Information to select and manage for SCCs, definition of key terms pertaining to SCC, and other issues.

Conclusion.

As forest plans revised under the 2012 Rule begin to come on-line, the Committee remains committed to our mission to “*learn locally, advise nationally*” and to provide thoughtful recommendations to the Chief and Secretary regarding implementation of the new Rule. This is a critical time, as the Forest Service now has 4 years of experience under its belt. Early Adopters are beginning to produce forest plans for comment, additional national forests (“mid-Adopters”) are beginning new revision efforts, and the Committee and agency are better able to discern trends in implementation. The Committee looks forward to continuing our productive collaborative working relationship with you and your staff.

Our next Committee meeting will be held in Portland, Oregon on July 12th – 14th 2016. As many of our members are from the Pacific Northwest, we are particularly eager to welcome the Committee and our Forest Service partners to our region to continue our constructive conversations.

Sincerely,



Susan Jane Brown
Co-Chair



Rodney Stokes
Co-Chair