

DATE: 1/17/2010
TO: NAFSR MEMBERS
FROM: DARREL L. KENOPS, EXECUTIVE DIRECTOR & CEO

SUBJECT: NAFSR MEMBER GUIDE FOR COMMENTING ON NFMA FOREST PLANNING REGULATIONS

THIS IS MY SECOND NOTE TO YOU CONCERNING THE OPPORTUNITY TO SEND IN COMMENTS TO OUR NAFSR NFMA FOREST PLANNING REGULATIONS RECENTLY PUBLISHED NOTICE OF INTENT.

THE FOLLOWING INFORMATION IS PROVIDED TO HELP YOU FOCUS YOUR REVIEW AND COMMENTS. THERE IS ADDITIONAL NOI INFORMATION THAT SETS CONTEXT FOR THE PRINCIPLES AND KEY QUESTIONS WHICH FOLLOW.

THE NOI ASKS THAT PEOPLE WITH IDEA'S AND SUGGESTIONS AS THE SCOPE AND CONTENT USE THE PRINCIPLES AND KEY QUESTIONS TO FORMULATE THEIR REPLIES. SO HERE GOES!!

SUBSTANTIAL PRINCIPLES:

1. LAND MANAGEMENT PLANS COULD ADDRESS THE NEED FOR RESTORATION AND CONSERVATION TO ENHANCE THE RESILIENCE OF ECOSYSTEMS TO A VARIETY OF THREATS.

SPECIFIC QUESTIONS THE FOREST SERVICE WOULD LIKE THE PUBLIC TO ADDRESS:

What do you see as the biggest threats to forest and grassland health and ecosystem resiliency? How do you define restoration? What is your concept of restoration? How can the planning rule foster restoration of NFS lands? What kind of conservation efforts can enhance ecosystem resiliency and prevent degradation?

2. PLANS COULD PROACTIVELY ADDRESS CLIMATE CHANGE THROUGH MONITORING, MITIGATION & ADAPTATION AND COULD ALLOW FLEXIBILITY TO ADAPT TO CHANGING CONDITIONS AND INCORPORATE NEW INFORMATION.

SPECIFIC QUESTIONS THE FOREST SERVICE WOULD LIKE THE PUBLIC TO ADDRESS

How can the planning rule be proactive and innovative in addressing the need for climate change adaptation and mitigation? What kind of data, research & monitoring could assist land management planners to incorporate climate change adaptations into plans? How should the planning rule address uncertainty?

How do other public and private entities recognize and incorporate uncertainty in their planning efforts? How can a new planning rule appropriately build in the flexibility land managers will need to adapt to changing science, information or conditions? What mechanisms should be used to incorporate new data? Do you know of any successful adaptive management regimes that can inform our process?

How should plans anticipate and address changing conditions or impacts outside of agency control? How can external factors be incorporated or recognized in plan guidance and requirements?

3. LAND MANAGEMENT PLANS COULD EMPHASIZE MAINTENANCE & RESTORATION OF WATERSHED HEALTH AND COULD PROTECT AND ENHANCE AMERICA'S WATER RESOURCES.

SPECIFIC QUESTIONS THE FOREST SERVICE WOULD LIKE THE PUBLIC TO ADDRESS.

Should a new planning rule include standards to address watershed health? If so, what might these look like? Should the agency be held accountable only for actions and problems on its NFS lands or

take into account water availability and quality factors that are outside of Agency control? What planning or management guidance could the Agency incorporate in the rule to protect and enhance water resources?

One way to approach planning for an NFS unit is to think about the future of the planning area thru the context of its watersheds? Do you see benefits or drawbacks to a rule requiring land management plans on a watershed basis? Do you see benefits or drawbacks to a rule requiring adherence to regionally specific Best Management Practices?

4. PLANS COULD PROVIDE FOR THE DIVERSITY OF SPECIES AND WILDLIFE HABITAT.

SPECIFIC QUESTIONS ON WHICH THE FOREST SERVICE WOULD LIKE PUBLIC COMMENT

How should the new rule provide for diversity? How should the planning rule guide protection of at-risk-species of animals and plants and their habitat? How can the new planning rule account for variables outside of Agency control, including those impacts that are the result of climate change.

Should species diversity provisions in planning look beyond the individual unit to a watershed or landscapes and scale and if so, what is a practical and workable way to incorporate a broader perspective? How could wildlife habitat monitoring be addressed in a planning rule?

5. PLANS COULD FOSTER SUSTAINABILITY ON NFS LANDS AND THEIR CONTRIBUTIONS TO VIBRANT RURAL ECONOMIES.

SPECIFIC QUESTIONS WHICH THE FOREST SERVICE WOULD LIKE THE PUBLIC TO ADDRESS

How can the planning rule reflect the inter dependency of social, economic and ecological systems in a way that supports sustainable management of National Forests and Grasslands? How can the Agency recognize and incorporate provisions in the planning rule for managing lands for sustained development of ecosystem purposes?

How can plans guide units of the NFS in achieving natural resource conservation and restoration goals in a way that is compatible with providing a set of opportunities for goods & services to support vibrant rural and national economies?

PROCESS PRINCIPLES FOR A NEW RULE.

1. LAND MANAGEMENT PLANNING COULD INVOLVE EFFECTIVE AND PROACTIVE COLLABORATION WITH THE PUBLIC.

SPECIFIC QUESTIONS FOR WHICH THE FOREST SERVICE WOULD LIKE PUBLIC COMMENTS

How could the Agency foster collaborative efforts? What kinds of participation, forums for collaboration and methods of providing input have you found most engaging? What should the rule require to ensure a planning process that is both efficient and transparent while allowing for full public collaboration and participation within reasonable timeframes?

What kinds of information, methods and analyses should the Agency provide to the public during the planning process to aid understanding of the possible consequences of a proposed rule and alternatives? What kinds of administrative review process should be offered to the public in the planning rule? Should there be a pre-decisional objections or post decisional appeal process?

2. PLANS COULD INCORPORATE AN "ALL LANDS" APPROACH BY CONSIDERING THE REALTIONSHIP BETWEEN NFS LANDS TO SURROUNDING LANDSCAPES.

SPECIFIC QUESTIONS FOR WHICH THE FOREST SERVICE WOULD LIKE PUBLIC COMMENT

How should the planning rule account for the relationship of NFS lands to surrounding landscapes? what other planning and assessment efforts or processes at the national, state or local level should the Agency look at that could inform an "all lands approach"

3. PLANS COULD BE BASED ON THE LATEST PLANNING SCIENCE AND PRINCIPLES TO ACHIEVE THE BEST DECISIONS POSSIBLE.

SPECIFIC QUESTIONS FOR WHICH THE FOREST SERVICE WOULD LIKE PUBLIC COMMENT

How can the planning rule support the creation of a shared vision for each planning area through the planning process? Local and regional differences will have an impact on desired conditions and on the successful creation and implementation of a shared vision for any given planning area. Given that different areas will have different needs should the planning rule allow a choice of planning process?

How could the planning rule create different process choices and how could they be presented in the rule?

What kind of provisions would need to be included to guide and evaluate a process choice?

Much discussion has been centered on how land management plans should be viewed, are they strategic documents that lay the foundations for specific future action to help meet unit goals or should land management plans also make project or activity decisions?

Based on your response to the questions above, what is the range of options for fully complying with NEPA during land management plan development, amendment or revision? Should the new planning rule require standards and guidelines that are required for all plans? How can the Agency analyze and describe the environmental effects of a planning rule in the environmental impact statement?

That's all for now!! Best regards! Darrel