

**Blog Comments on the JRoller Planning Rule Blog as of July 1, 2010**

**May 25, 2010: What suggestions do you have for making the Planning Rule blog better?**

**What can we do to encourage a more robust discussion on this blog?**

Trying to explain complex concepts dealing with our forests in 1000 character chunks is ridiculous, at best. Rule changes should also include implementation plans, as it does no good to push rules that have no way of succeeding, in reality. For example, pushing for radically-increased monitoring program, without a quality workforce pool or ability to offer jobs with benefits, cannot succeed. An increase in thinning projects will require vast armies of experienced timbermarkers that simply do not exist. The Forest Service has always felt they could teach anyone to decide which trees live and die. I fear that the Forest Service will decide to manage our forests with semi-controlled wildfires, and we will just have to live with continued mistakes from firefighters, who choose to not follow NEPA regarding their Let-Burn program.

Posted by **Fotoware** on June 08, 2010 at 11:18 AM CDT <#>

**May 25, 2010: What are your suggestions for making the 4<sup>th</sup> National Roundtable, both the online and in person components, as productive as possible?**

**How can we improve our outreach and reach individuals and groups that may have been underrepresented in previous roundtables and online discussions?**

Sounds like you are headed roughly in the right direction. Give us some feedback about the things you heard that you liked during the roundtables, and what you are thinking of doing with it. I would also suggest you tell us the things you didn't really care for and don't intend to pursue, and why, and let us respond to that. After a month or so of that it will probably be time to start writing the proposed rule. Let us know when you are done!

Posted by **Jim Gerber** on May 25, 2010 at 02:41 PM CDT <#>

Amazingly, with all the emphasis on "climate change", absolutely nothing about salvage logging was mentioned. A Rule change is the perfect place to bring in a scientific salvage policy, as we have an estimated 17 million acres of dead and dying forests. Now, with the "end run" of giving fire fighters the power to let ANY ignition burn, this will only result with increased mortality and a catastrophic loss of the last traces of ancient "cultural landscapes". Trading ponderosa pine forests that can live for hundreds of years for flammable lodgepole pines that live for no more than 120 years is a disaster that will affect us for centuries. Sadly, the cry from the powers that be is "BURN Baby, BURN!!....NOW, Baby, NOW!"

Posted by **Fotoware** on May 27, 2010 at 10:06 AM CDT <#>

I am a member of the Back Country Horsemen Chapter that has taken on the task of removing deadfall trees from 250 miles of in the two wilderness areas nearest to Denver. As the Forest Service has no budget to do this, if we don't do it, it does not get done and recreation suffers. I am also a member of a local "Friends of" group. From my perspective, I cannot see how recreation needs can be met without a dedicated group of volunteers who have proprietary feelings toward their local National Forests. Yet I find nothing about VOLUNTEERS and working with volunteers in the Rule deliberations to date. Part of that discussion should include finding some way to get approval for volunteer projects in a more timely manner. It should also include guidelines for District Rangers when dealing with volunteers.

Posted by **Daniel E. Shier** on June 21, 2010 at 09:29 AM CDT <#>

Earth to Mr. Jensen... Earth to Mr. Jay Jensen!! Yes, dead trees DO burn VERY well and catastrophic wildfires DO exist, despite your testimony and the flawed studies you have displayed. Here is photographic evidence that dead trees burn EXTREMELY well. [http://3.bp.blogspot.com/\\_qRVP02SjfCs/S4G8Iv2dGUI/AAAAAAAAAtA/hBdoevTOoBI/s400/P2150516-web1.jpg](http://3.bp.blogspot.com/_qRVP02SjfCs/S4G8Iv2dGUI/AAAAAAAAAtA/hBdoevTOoBI/s400/P2150516-web1.jpg) This photo is from last year's fire in Yosemite, burning in what used to be majestic old growth that was never logged. 20 years ago, wildfire killed all that old growth but left the snags, which all burned last year, leaving a barren moonscape. Yes, we have 200 MILLION dead trees in the west, and they DO burn quite well.

Posted by **Fotoware** on June 28, 2010 at 09:23 AM CDT <#>

### **May 12, 2010: How should the rule allow for flexibility in land management plans?**

As a backcountry skier I love to quietly enter pristine backcountry regions. Please consider our sport and impacts of noise and pollution as you consider winter planning.

Posted by **Tim** on May 19, 2010 at 11:21 AM CDT <#>

OK, now that the national and regional roundtables are over, now what?

Posted by **Jim Gerber** on May 23, 2010 at 10:58 AM CDT <#>

### **May 12, 2010: The Contribution of Recreation and other Goods and Services from National Forests to Vibrant Economies**

Developing rural economies includes rural tribal communities. Plans would foster these economies and meet important trust obligations by prioritizing opportunities for contracts with tribes and tribal businesses. There should be greater coordination and implementation of training, hiring, and contracting opportunities to Tribes and tribal peoples. However, economy cannot be the primary focus of the Forest Service.

Posted by **slucero** on May 11, 2010 at 06:08 PM CDT <#>

What, if anything, should the rule say about what forests should do to contribute to vibrant local, regional, and national economies? FS lands, especially in areas such as Western MT, absolutely surround us thus these lands are critical to the health and vitality of the local and statewide economies. These lands MUST be able to better utilized for all aspects of public access and management. Should forests be required to assess the potential contribution and/or impacts of forest management on local/regional/national economies? Absolutely! With every assessment, impacts to local economy should be strongly considered. If so, what would the social/economic assessment(s) look like, how would they be used and at what scale? All public lands should have balanced use of all kinds. What we have now is no or little use of the lands either by considerable sectors of the public and by the local economies and industries. What little access there exists highly restricts or absolutely shuts out entire sectors of the public and industries that could have greatly assisted with greater control of forestry health. How might the rule deal with differences around the country in degree of influence of national forest system lands to local economies and the extent to which forest management can really make a difference? Forestry health and management needs publicized as vital to the world and that does not mean shutting people out either recreationally or by management for forestry thinning, weed management, species health, etc. FS lands are not wilderness and many people do not understand that these lands are meant to be managed for use and enjoyment of current and future generations....if management continues as is, bugs, fires and weeds will have destroyed them. Active management and access for recreation MUST be weighed heavier than currently done. What, if any, guidance should there be in the rule about how forests provide for recreational uses? Access to public lands means access to all, not just those who are able to hike and bike. As our population ages, more and more people are unable to participate in these physical activities. We must consider access for all when discussing recreational access. How should the rule address the need to include, balance and reconcile local, regional and national interests? Engage the locals in each area. One rule does not work for all. Communities who want to contribute to the process for local forestries will and should be asked to the table. That will most likely result is diverse management plans but that is a good thing. Broadbased support begins at the bottom with grassroots initiatives....public and private sectors not familiar with local issues, concerns and history should not dictate public lands management. This must be done by thinking our of the box but in order to dot his massive changes MUST be made within the USFS.

Posted by [Racene Friede](#) on May 18, 2010 at 04:09 PM CDT <#>

### **May 11, 2010: Role of Science**

The commonly accepted definition of “latest planning science and principles” does not give sufficient deference to traditional tribal knowledge and wisdom. There are numerous instances where the “latest science” is only starting to catch up and understand how traditional tribal practices are in fact the best practices for stewardship. Tribal participants must be included in interdisciplinary science groups that define “best practices” in forest stewardship/management planning decisions. However, including tribal knowledge cannot require an analysis or quantification of tribal knowledge. Traditional tribal knowledge cannot be subjected to scientific analysis. In order to be an effective tool, tribal knowledge must be respected and trusted, as well as the elders and practitioners who share it.

Posted by [slucero](#) on May 11, 2010 at 05:55 PM CDT <#>

"Science" is just one of many sources of information used by people with values to make choices about what is appropriate at any particular time for any particular place. The rule just needs to specify general categories of information to develop. By working together with other interested parties, which will undoubtedly include many "scientists," there will by default be oversight as to what "science" is being used to develop the needed information that will "inform" the recommendations being made. Science is ever changing. Personally, I value the artist's perspective equally to the scientist's perspective, as I believe planning is as much about art as it is about science.

Posted by [treelady](#) on May 13, 2010 at 09:15 AM CDT <#>

<b>May 11, 2010: What, if anything, should the rule provide regarding restoration?</b>
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Problems are being ID'd about species viability analysis being overly time-consuming, taking more expertise than is available at Forest level, and that appropriate scale doesn't conform to admin boundaries. All point to need for enhancing regional (geographically) science support, especially given the need for monitoring for adaptive management during changing climate. Could be done by better integrating FS research into management decision-making process. Perhaps the rule should recognize that stronger, more integrated role. Research branch would need to retain its independence from NFS so that science could not be manipulated.

Posted by [Kim Clarkin](#) on May 11, 2010 at 10:12 AM CDT <#>

Re: Dr. Dominick Della Sala' comments, I think it would be helpful to define "fire risk". I think people are concerned about negative effects from wildfires to communities and soils. Would like to have a forum for debating this in greater detail perhaps online?

Posted by [Sharon Friedman](#) on May 11, 2010 at 10:53 AM CDT <#>

Desired conditions in practice are very difficult to talk about in dynamic systems. It is easy to say "longleaf restoration" ; it is not so easy to say what "conditions" we need in western fire influenced forests; last rule, this went down to number of stems per acre of what species of what age. Yet, there is no reason to believe a certain condition is more "desirable" than any other, unless you go back to HRV (which doesn't really work based on climate change). Or you go on the basis of what wildlife like, but that's dynamic through space and time.. How about just talking about ecosystem services instead?

Posted by [Sharon Friedman](#) on May 11, 2010 at 11:23 AM CDT <#>

Should the horse be restored to provide for diversity of plant and animal communities?

Posted by [Andy Stahl](#) on May 11, 2010 at 12:28 PM CDT <#>

Kim- not sure I am clear.. how can FS Research be "integrated" in decisionmaking while being "independent?" Not clear on how that would work.

Posted by [Sharon Friedman](#) on May 11, 2010 at 02:22 PM CDT <#>

Simply letting forests burn and then calling what grows back as "natural", "desirable" and "resilient" is short-sighted and unscientific. Letting "unintended consequences" rule the forests is, plain and simple, "unstewardship". John Muir is rolling over in his grave at the concerted forest destruction in his name. This includes the idea that "there is no catastrophic wildfires". Many "scientists" and "academians" are pushing the idea that whatever happens when we do nothing is what we want.

Posted by **Fotoware** on May 11, 2010 at 02:50 PM CDT <#>

An important question that needs to be asked is; How can recreation be valued and have importance when catastrophic wildfires impact those features that people want? How many people stay away when smoke and catastrophic wildfire has impacted a popular recreation area? How many years, and even decades, will it take before people will want to recreate in the vast incinerated landscapes?? NO ONE wants to talk about this issue! Yes, recreation is very important but, wildfires and recreation DON'T mix well at all! Also, using a clearcut as an example against timber sales is unfair. Region 5 hasn't had clearcuts for 17 years!!!!!!!

Posted by **Fotoware** on May 11, 2010 at 02:51 PM CDT <#>

"Best" could be replaced with "well founded in science."

Posted by **ccairnes** on May 11, 2010 at 03:06 PM CDT <#>

Concerning public input and best science; yes, include public input but reserve the right to exclude ignorant public comments. Also, Furnish's reference to "Donato's Folly" is ridiculous. I worked on the Biscuit salvage and saw that the paper was quite bogus. Peer review should only be accepted when the reviewer attaches his/her name to the review. Anonymous peer review is inherently unreliable and corruptible.

Posted by **Fotoware** on May 11, 2010 at 03:09 PM CDT <#>

Collaboration, consultation and cooperation with Tribes should play a significant role in the restoring and then conserving of forest and grass lands. Resilient ecosystems require holistic approaches, recognizing that humans are a part of the system. Restoration and conservation must include working with the natural order not controlling it. Conservation is often looked at as a completely hands-off approach that "allows the natural system to care for itself." While restoration requires significant "hands-on" work. Tribal peoples have for generations cared for forest and grass lands. Conservation must be defined as caring for lands in a matter that is consistent with the natural order, but acknowledges the positive role that humans can play (and in the case of indigenous people's has played) in the overall ecosystem. Restoration must be done first to repair previous "management" of forest lands, then conservation from a sustainable approach must be implemented.

Posted by **slucero** on May 11, 2010 at 06:32 PM CDT <#>

In order to effectively manage National Forest for Restoration and Resiliency The USFS need to consider Winter Travel Planning. This is when wildlife is most vulnerable and currently little if any management is occurring.

Posted by **Forrest McCarthy** on May 12, 2010 at 04:57 AM CDT <#>

Regarding monitoring: Yes, monitoring is essential to responding to the constant changes that go on in our forests. However, that monitoring needs to be done with qualified people, who know what they are looking at and can provide the necessary accuracy and unbiased data collection demanded by the research branch of the Forest Service. Just like all the other many proposals and pie-in-the-sky ideas tossed around during the whole of this process, absolutely NO attention is paid to how to implement these items with the severely limited pool of talent. Hiring people off the street, as the Forest Service has done in the past, only results in "Federal McForestry", a revolving door of underqualified employees, ala fast food.

Posted by **Fotoware** on May 12, 2010 at 09:31 AM CDT <#>

### **May 4, 2010: Input from our nation's Indian tribes**

Integrated Resource Management, or Indigenous Stewardship principals and practices could be incorporated and institutionalized through the formulation of long term partnerships with tribes NGO's, individuals and contractors. Close coordination with Tribal planning and implementation efforts at the local level can provide a model for capacity building to collaboratively address adaptive response to complex cross scale interactions and national issues like large fire cost containment. In building diverse local capacities as a primary objective, practice, or principle under the new rule, integrated baseline expenditures that progress restoration of natural disturbance regimes and appropriate human interaction with natural processes, can reduce dependency on emergency expenditures and foster understanding and support of long term integrated stewardship of existing federal programs.

Posted by **Bill Tripp** on May 18, 2010 at 05:14 PM CDT <#>

### **April 21, 2010: What's next? Looking for input for the 3rd Roundtable and beyond...**

The input from all the stakeholders at these meetings has been excellent. Everyone has been calling for more collaboration in the process and yesterday, people gave their thoughts on some of the characteristics of good collaboration. I sense that most participants that have been involved in productive collaborative efforts know that their positive results were won from serious and difficult give-and-take, compromise and sometimes consensus. I feel that these roundtables have an opportunity to be an example of the type of collaboration everyone is calling for. In their current form, they are NOT such an example. I would propose that we restructure the next roundtable to be a serious collaborative engagement where some of the difficult issues wrapped up in writing a Rule are worked out. The time allotted is probably not adequate, but maybe it can be a start.

Posted by **Bruce Meneghin** on April 21, 2010 at 10:41 AM CDT <#>

It seems like we would need to see more analysis of or at least access to the comments that have been received so far in order to give meaningful input on what the substance and process for the last national roundtable should be. The posted public comments from the NOI comment period are not at all user friendly and no analysis or even index is available. No internal comments are posted. Some summary information from some of the roundtables is available, but not on any way consolidated. Given that, I would suggest the

rule writers develop a long list of possible topics for the next national roundtable for participants to whittle down themselves into the few most important to them, or even post a survey monkey type thing for anyone to "vote" on what to discuss. Then, somehow make sure the different views on the topic are represented and have an actual assignment for participants (like tweaking some possible rule language). Actually working through something in a collaborative fashion, rather than just speaking more or less for the record, might give more of a sense of accomplishment and actually give a result the rule writers can use. Just DON'T use the principles from the NOI. If, as Tony Tooke says, "it's a blank slate," then you should dispense with the NOI principles; you have progressed beyond them at this point.

Posted by [treelady](#) on April 21, 2010 at 12:59 PM CDT <#>

I've watched quite a bit of the round table meetings on the webcast and I'm grateful for that opportunity. One of the highlighted TENSIONS of these sessions is the call for responsiveness to local concerns, contrasted with the need for national control. Many people said they wanted both. OK. No one said this was going to be easy. Tension is good: we're used to the balance of power, checks and balances.....BUT... then I started to digest all the comments; tried to strip away all the politeness and ask myself "what do they REALLY want?" SLOWLY, I began to realize that people were NOT calling for an "elegant" crafting of a fine balance between local and national control. Like Tony Cheng said, people want an opportunity for INFLUENCE, not just input.....So when they say they want the FS to consider local input, they're saying that they want a seat at the local table. Fine. But when they also say they want consistency and accountability pushed from the national level, they're saying that when things don't go their way at the local level, they want to have some other place to turn; a Rule that will help them prevail. SORRY, friends. This is not going to get resolved with each faction saying that they want both light-sabres AND phasers. We're going to have to sit down at a REAL collaborative session and do the tough haggling needed for disarming.

Posted by [soTall](#) on April 21, 2010 at 10:55 PM CDT <#>

I would like see the new rule address HOW the Forest Service will select the final alternative. Will they put the alternatives on separate pieces of paper and paste them up on the wall and throw a dart at them (closest wins); or will they draw alternatives out of a hat; or fill in little circles to indicate how well alternatives meet decision criteria; or will they use Decision by Advantages? Excuse my sarcasm, but selection of the final alternative may be the weakest link in the planning process. It is often impossible to determine why the agency chose the alternative it did because there is no rationale for the decision it made. Only a generic statement that the selected alternative "best" meets the decision criteria. There is seldom an analysis of why that particular alternative best meets the needs of the American people, so we are left wondering why it was selected. The planning rule should specify a specific method to be used in choosing the selected alternative.

Posted by [Jim Gerber](#) on April 22, 2010 at 11:20 AM CDT <#>

If the non-locals were educated about all the horrific impacts and issues, they might possibly see why rural folks want more control. The eco-idea of "I probably won't visit all those protected wilderness areas but, I'm happy just knowing they are there" is short-sighted and often quite destructive when massive bark beetle attacks and catastrophic wildfires wipe out vast acreages of life-giving forests. In fact, eastern urbanites want to lock up as many forests as possible into wilderness areas and "wildlife corridors", overriding local

knowledge and expertise..... Most people really WANT to do the right thing but, they lack the education and knowledge of the current ongoing disaster that is happening throughout the west. Historians will look back on this era and say that current forest policies are "barbaric and wildly destructive". Too bad I can't post my 20 years of photos from dead and dying forests.

Posted by **Fotoware** on April 22, 2010 at 11:33 AM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:30 PM CDT <#>

BREATHE, Stu, BREATHE! Your concerns ARE being addressed but, a decision is very far from being made. If you aren't a part of the solution, then you are a part of the problem! Fencing off forests and letting them burn doesn't "maintain healthy species populations". Opposing human intervention to deal with this massive, ongoing disaster only results in widespread wildlife death and very costly forest habitat destruction. The complexities of competing issues and the variety of landscapes is daunting, to say the least. I have worked on 26 different National forests in 11 different states. "Preserving" forests so very far from "natural" has been proven to be the wrong thing. We need to "sculpt" existing forests into better-functioning ecosystems, or face losing them altogether.

Posted by **Fotoware** on April 23, 2010 at 09:23 AM CDT <#>

Another issue that seems sooooovery carefully avoided by the Planning Rules and this process is the ugly situation of salvage logging of both bark beetle infestations and wildfires. Most of my 25 year career has been involved with salvage logging and, I've seen the situation degenerate into lawsuits, misinformation, eco-terrorism and intense re-burns. Last year's botched prescribed fire in Yosemite clearly illustrates how intensely damaging re-burns are to unsalvaged forests. Yosemite, and other National Parks are "living laboratories" and the evidence is overwhelming and unmistakable that careful salvage logging is essential to restoring forests MUCH faster than "letting nature take its course". This salvage logging issues clearly can fall under a new Planning Rule and, hopefully, can lead to better forest management. PLEASE address this VERY important issue in future meeting!!

Posted by **Fotoware** on April 26, 2010 at 12:25 PM CDT <#>

We also need to talk about "wildlife corridors" and new Wilderness designations. I see that the Sierra Club has placed a huge emphasis on establishing a system of "wildlife corridors" and new Wilderness to provide "wildlife connectivity" throughout the west. My concern is that we have a great many acres that simply aren't suitable for either "wildlife corridors" or for new Wilderness. The Sierra Club has even laid out a definition for these corridors, and dead/dying forests just don't meet those guidelines. In fact, those ARE the kinds of lands that this new Planning Rule is intended to address! Corridors are, indeed, a good idea for healthy and robust forests but, locking out management options for our currently dead and dying forests is a death sentence for forests that were formerly not pure lodgepole stands.

Posted by **Fotoware** on May 02, 2010 at 05:34 PM CDT <#>

I will like to see the cows and sheep that are permitted to graze and destroy public lands and pollute public water sheds for private profit--stopped-- I don't want the domestic sheep and cows infecting native wildlife with diseases that can wipe out ALL of the native Big Horn or white tailed deer-- This is risky business that should be curtailed before we do irreversible harm by letting domestic cows and sheep eat and poop our public forests and wildlife into oblivion.

Posted by **Cilantro** on May 05, 2010 at 12:45 PM CDT <#>

Sadly, the preservationists want control of the term "restoration", when they really want "preservation" and no management at all. Sacrificing forests in the name of preservation is destruction of forests, in the end. We need to look at the "big picture" and utilize the "Precautionary Principle" to restore ecosystem function, instead of "letting nature take it course". These are two colliding issues that can only lead to destroyed forests.

Posted by **Fotoware** on May 11, 2010 at 10:52 AM CDT <#>

The core of the argument is passive versus active restoration. Deciding to let ecosystems be restored by doing nothing versus actively working towards a resilient, functioning forest is a no-brainer, to me. Just letting unnatural forests die and burn does NOT lead us to a desired restored and resilient condition.

Posted by **Fotoware** on May 11, 2010 at 10:59 AM CDT <#>

Cilantro...where do you get your information? There is no evidence to support that cattle & sheep infect wildlife with diseases that will WIPE them out. Please tell me you eat beans & rice to fulfill your dietary need for protein & you walk barefooted; otherwise, you are being hypocritical to speak against livestock. Properly grazed grass is all we have left to produce anything on our public lands. The miners and loggers are nearly run off. We have too many people who do not produce anything...they are money shufflers. Livestock growers use renewable resources (sun, water, plants) to produce what I call "new money". And our country needs a lot of "new money" to get out of the debt it's in. I'm sorry you grumble about private profit on public lands. There is opportunity for you too if you have the ability and play by the rules. You should stop biting the hand that feeds you!

Posted by **Durango Sandy** on May 13, 2010 at 09:55 AM CDT <#>

## **April 20, 2010: Plan Revision and NEPA- Using the Latest Planning Science**

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:30 PM CDT <#>

Actually, many NEPA processes have been simplified and streamlined already, through experience and practice. The main thing that needs to be changed is to have the ability to

bypass litigation by having projects meet certain criteria that can be certified not to have significant adverse impacts. Some criteria examples might be keeping a minimum required canopy cover, protection of large trees, minimum stream buffers and protections of "controlled areas". Much of those are already covered by existing NEPA. Remember, folks, that this IS an emergency situation, and vast areas are either dead, or at the very highest of risks to complete loss.

Posted by **Fotoware** on April 24, 2010 at 11:22 AM CDT <#>

We need to manage national forests specifically for all species of wildlife & for the different stages of forest development. Currently, all species of animal wildlife that rely on young growth forest habitat are becoming extinct due to the lack of forest harvesting. Let's see responsible harvesting of interlaced tracts of forest to promote the restocking of young growth forest wildlife dependent on that habitat!!

Posted by **Dave Kunselman** on April 24, 2010 at 04:31 PM CDT <#>

Those against logging make their judgments based on the perceived notion that the forest will be forever left how it looks immediately after it is clear cut. This is 100% wrong!!!! After a clear cut a plethora of life springs forth due to the exposure of sunlight. Young saplings sprout from the roots of preexisting trees & undergrowth gushes forth. Without this type of forest management, these species reliant on new forest regeneration are headed for extinction in certain areas of the country already!!! In North GA where the ruffed grouse was common place, now it is coming to the point where it may be a once in a lifetime occurrence to hear a ruffed grouse drumming in the spring. Responsible harvesting of mature forest tracts interlaced through mature forests is the answer. Cut a tree to save a life!!

Posted by **Dave Kunselman** on April 24, 2010 at 04:32 PM CDT <#>

I think a planning revision should occur when it becomes clear the actual DFC for the forest (as it is occurring on the ground as the plan is being implemented) is deviating from the DFC that was established in the Forest Plan. If the forests are becoming older, sicker, more susceptible to insect and disease attack, prone to more fires that are more severe in nature, then I think a revision may be in store. You would know that by monitoring the objectives to see if they are meeting the goals. If not, you may have problems right here in River city!

Posted by **Jim Gerber** on April 25, 2010 at 11:04 AM CDT <#>

The entire forest plan does not need to be redone each revision. The plan only needs to deal with those issues and concerns the public raises at each revision time. The plan may only need to deal with a few issues on one forest, but with a whole range of issues on another forest. The forest planning rule should allow that flexibility.

Posted by **Jim Gerber** on April 26, 2010 at 03:54 PM CDT <#>

<p><b>April 20, 2010:</b> Considering the relationship between national forests and surrounding lands (All lands approach)</p>
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I suspect the fact that no one has responded to this question after a week tells you something about how important it is. I would say forget the no-lands approach. The federal government has no control over private lands, and the planning rule should not try to establish a control mechanism. If a private land owner wants to collaborate with the FS they can do so under existing regulations. Lets leave it at that.

Posted by **Jim Gerber** on April 25, 2010 at 11:10 AM CDT <#>

One aspect of the topic that could be important for some National Forests: maintaining or attracting infrastructure where other forest ownership has an inadequate supply of timber to support saw or pulp mills, loggers and other labor. The old goal of sustaining local communities may be important on certain National in order to sustain a market for products from other local forests. That is not to say that there should be any attempt to influence management on private lands, just do not prevent that management.

Posted by **Norris Boothe** on May 06, 2010 at 01:24 PM CDT <#>

An all-lands approach must incorporate tribal lands and management practices. National Forests, tribal trust lands, state forests, State and national parks and public lands are ancestral tribal lands. Tribes have generations of knowledge and wisdom regarding the care of these lands. Collaborative efforts must be in addition to government to government consultation to be truly effective in developing an all-lands approach. Many regions have already began instituting policies and guidelines for greater collaboration with Tribes, those regional efforts, frameworks (like the Sierra Nevada Framework, and California Gathering Policy), must be given deference and weight in the planning rule to ensure that they are incorporated into management plans.

Posted by **slucero** on May 11, 2010 at 05:57 PM CDT <#>

## **April 20, 2010: Adaptive Management**

The new planning rule can build in flexibility by providing for adaptive management. The idea that as the forest change (as they always do) managers need to adjust their management practices to meet those changes. This is not new. Adaptive management has been part of the planning rule for at least the last 15 years. Plans should be evaluated every 5-10 years to see if the forest objectives are being met. If the objectives are not being met then the goals are not being met, and if the goals are not being met then the DFC for the Forest is not being met. An amendment (or a plan revision) should be triggered when the DFC for the Forest is deviating from that prescribed in the forest plan. Whether it should be an amendment or a plan revision will depend on how much change in the goals and objectives are required to bring the actual DFC back in line with the Plan DFC. This also is not new. Forests have required monitoring of goals and objectives for many years. The problem is the Forests never used the monitoring process to identify objectives that were not being met, and therefore needed an amendment or plan revision to make changes. Sooo, how do you get the Forest Service to do that?

Posted by **Jim Gerber** on April 21, 2010 at 12:12 PM CDT <#>

The trouble is, the "Desired Future Condition" that the litigious public wants is the most unnatural of all. Forests with zero human impacts in them is their DFC. They want it left alone, to "recover", or to not "recover", as "wilderness". No houses, no roads, no machines, no firefighters, no dams, no powerlines, no archeological sites and no trails, etc. Until litigation is dealt with, all this planning stuff is money and nature going up in smoke. Adjusting the EAJA to make litigation unprofitable is a start, as the Feds are actually PAYING eco-groups to sue, and then pays them AGAIN when they win against conflicting rules, laws and policies. Quite frankly, Planning Rules without litigation reform is doomed to fail, most miserably!

Posted by **Fotoware** on April 21, 2010 at 01:06 PM CDT <#>

Yea, I agree with you Fotoware that some enviro groups are playing the system, but I don't know what we do about it. I think the best we can do is get the planning rule right so it meets the needs of the American people, and then hope that Congress can do something about litigation reform and judicial reform so that federal district judges don't make decisions beyond their expertise.

Posted by **Jim Gerber** on April 22, 2010 at 12:17 PM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:31 PM CDT <#>

Most stakeholders and many in the FS have a mistaken idea that adaptive management is about using trial and error, or passive, incremental adjustment to management actions in a reactive fashion when there are changes in social-ecological conditions. An active form of adaptive management has a focus on learning and uses management actions as experiments to reduce the uncertainties that are inevitably associated with dynamic social-ecological processes. Active adaptive management requires the FS to be flexible and to engage scientists/researchers, and community-based stakeholders in an on-going, collaborative framework to: identify the problem (sometimes overlooked, as most want to get to possible solutions but if time is not spent here then it leads to 'solutions' to that don't address the real problem); exploring alternative mgt actions to be tested and creating hypotheses; designing and implementing one or more mgt activities; focused, purposeful monitoring to answer the hypotheses; evaluation of monitoring data and dissemination of info; and adjustment of mgt actions if needed in response to lessons learned. Achievement of mgt objectives is secondary to LEARNING about how or why they were achieved. It takes trust and a true collaborative partnership but it can lead to better future decision-making and can increase social and institutional learning, and potentially reduces conflict. How this might be written into a planning rule is the the tricky part. But if a better definition - and support from leadership for implementing it - were put into the rules/regs/directives, it might go a long way in creating the collaborative atmosphere necessary to marginalize those interested only in adversarial litigation as a means of 'participating.'

Posted by **Melanie Lawrence in Flagstaff, AZ** on May 12, 2010 at 12:05 PM CDT <#>

## April 20, 2010: Providing for effective collaboration

Why not make fuels reduction projects that meet certain criteria unappealable and excluded from litigation? Certainly, we can leave some frivolous lawsuits behind that nitpick the process instead of the overall goal of forest health and resilience? Clinton sought to do just that with the Salvage Rider but, that was a sloppy piece of legislation. We cannot trust Congress to know what is best for our forests if they don't even want to learn about the issues. Place-based bills often try to satisfy all parties but, everyone loses when "preservationists" sue and the forests are incinerated. Look at the Quincy Library Group! They had SERIOUS collaboration but, it failed when a simple husband and wife team refused to come to the table, sued and won. Chad Hanson isn't interested in ecology. His goal is to "eliminate the Forest Service Timber Sale Program". Even his peers in the Sierra Club have called him "shrill" and "too extreme".

Posted by **Fotoware** on April 21, 2010 at 01:27 PM CDT <#>

This is starting to get a little repetative. I have answered this question at least once (maybe twice). At any rate, stakeholders and other agencies should be involved in the planning process through the ongoing process they now employ to involve publics. No need to reinvent the wheel. I believe the FS should use a pre-decisional objection. That way some disagreements could be worked out before the final decision. Once the final decision is made for a Plan it could then go forward without time consuming appeals. True, some group could still litigate the decision, but they cannot appeal ad nauseum.

Posted by **Jim Gerber** on April 22, 2010 at 11:45 AM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:41 PM CDT <#>

I think we are going to have to have a way for the Forest Plan Revisions to be done in coordination and cooperation with local county and tribal governments. Its already required, but hardly manifests other than the usual scoping process. Then the county and tribes could help convene a collaborative process, probably some kind of Forest Advisory Committee that is multi-stakeholder....that seems to work and has a good history in many places. If we are going to work on Stuart's priorities (healthy species populations and restrictions on destrubutive human activities) as well as other people's priorities, its going to take all hands and the cook to actually figure out the definition of each of those words and how to manage the forests to get there.

Posted by **Lynn Jungwirth** on May 01, 2010 at 09:45 PM CDT <#>

Tribes consistently point out that proper collaboration, consultation and cooperation between the Forest Service and Tribal governments would address the priorities identified by the Forest Service in its December 17, 2009 Notice of Intent to Revise the Planning Rule. Additionally, respect and utilization of traditional knowledge and practices has been identified as potentially playing a significant role in the restoring and then conserving (under the definition identified above) of forest and grass lands. For purposes of discussion

collaboration should include engaging and discussing proposed actions prior to drafting any official plans, rules or policies (i.e. we are thinking of implementing this idea/policy/project, what are your thoughts?) Consultation would include government to government consultation. Finally cooperation with tribes would include contracting with Tribes to perform work on forest and grass lands; also recruiting tribal peoples to work for Forest Service. Cooperation is essentially working hand in hand with Tribes to implement the plans, policies and projects that were developed with their input.

Posted by [Stephanie Lucero](#) on May 11, 2010 at 05:41 PM CDT <#>

There is universal agreement that forest planning requires more effective and proactive collaboration. However, as a federal agency, the FS has a trust responsibility to Tribes that encompasses a higher duty than what is owed to the general public and should be prioritized in the Planning Rule. The priority should be planning that involves effective and proactive collaboration with Tribes and Tribal organizations. This collaboration must be in addition to government to government consultation. The Planning Rule Revision and subsequent changes in national forest land management plans most assuredly will affect numerous tribal rights and interests. Obama stated, "History has shown that failure to include the voices of tribal officials in formulating policy affecting their communities has all too often led to undesirable and, at times, devastating and tragic results. By contrast, meaningful dialogue between Federal officials and tribal officials has greatly improved Federal policy toward Indian tribes." Tribal words, definitions, and insights must be included in the early stages of planning through early collaboration.

Posted by [slucero](#) on May 11, 2010 at 05:52 PM CDT <#>

Forest planning requires more effective and proactive collaboration. However, the FS has a trust responsibility to Tribes that encompasses a higher duty than what is owed to the general public and should be prioritized in the Planning Rule. The priority should be planning that involves effective and proactive collaboration with Tribes and Tribal organizations in addition to government to government consultation. Obama stated, "meaningful dialogue between Federal officials and tribal officials has greatly improved Federal policy toward Indian tribes." Tribal words, definitions, and insights must be included in the early stages of planning through early collaboration on all issues involving ancestral tribal lands. Proper collaboration, consultation and cooperation between the Forest Service and Tribal governments would address the priorities identified by the Forest Service.

Posted by [slucero](#) on May 11, 2010 at 06:02 PM CDT <#>

Tribal collaboration, consultation and cooperation is essential to caring for Forest and grass lands in a sustainable and healthy way. For purposes of discussion collaboration should include engaging and discussing proposed actions prior to drafting any official plans, rules or policies (i.e. we are thinking of implementing this idea/policy/project, what are your thoughts/suggestions?) Consultation would include government to government consultation as defined by Tribes. Finally cooperation with Tribes would include partnering with Tribes for forest care, contracting with Tribes to perform work on forest and grass lands; also recruiting tribal peoples to work for Forest Service. Cooperation is essentially working hand in hand with Tribes to implement the plans, policies and projects that were developed with their input. Facilitating and compensating Tribes for caring for their ancestral lands.

Posted by [slucero](#) on May 11, 2010 at 06:07 PM CDT <#>

## **April 20, 2010: Social, economic and cultural contribution of Forest Service lands to surrounding communities**

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by [stuart phillips](#) on April 22, 2010 at 10:41 PM CDT <#>

## **April 2, 2010: Restoration**

Restoration is an important but challenging issue for NFS lands. Does restoration mean treatments that produce a stand structure and composition with historical range of variability? Or in the context of changing climate, does restoration mean treatments that produce a resilient landscape structure and composition that restores ecological function? And that the resiliency increases the likelihood that the ecosystem services will be sustained? Restoration to me means the latter, establishing a resilient landscape that can adapt to changing climate. Historical range of variability provides an important perspective on function, but the rear view mirror perspective may not be the best objective for planning future forest conditions. The next planning rule should also address whether restoration is a one time "fix", without the need for future management - or are restoration treatments intended to recalibrate the current condition that will require a different regime of treatments in order to retain ecosystem goods and services from the NFS.

Posted by [DLMurphy](#) on April 02, 2010 at 11:25 AM CDT <#>

Hunting, fishing, and other shooting related sports must be considered as well as the other issues. Many people depend of public land for such things, as private land useage is becoming increasingly more expensive and inaccessible for the average wage earner.

Posted by [Al Young](#) on April 03, 2010 at 10:07 PM CDT <#>

The idea of abandoning true restoration to a previous, resilient, diverse and robust Indian-managed landscape into one that eliminates stewardship and ignores the Clean Air Act, the Clean Water Act, the Antiquities Act, and the Endangered Species Act is sheer lunacy and patently illegal. Clearly, the Roundtable has blatantly ignored these cornerstone laws in favor of brand-new landscapes that predictably arise after catastrophic wildfires. They have clearly ignored the horrific impacts of erosion, air pollution, old growth eradication, endangered species habitat, elevated greenhouse gas concentrations from forests, destruction of cultural resources, public safety and property, and destruction of essential public infrastructure. A sad time, indeed, for people who love forests and live in them.

Posted by [Fotoware](#) on April 04, 2010 at 01:46 PM CDT <#>

Restoration to me means that rather than a top down restoration plan, restoration should be openly discussed in every Ranger District. Public comment and community forums are the

only way to honestly gauge the communities directly affected by management decisions. There is a delicate balance between actually restoring a forest and managing as a "Multi-use" resource that benefits National, State and local economies. This benefit should be attained via open dialog and comments. I find the advertising of this process to be severely lacking in the rural area of Oregon that I reside in. We are tired of seeing our forest neglected and rotting, there is economic value going to waste everywhere in the Willamette National Forest. Also road closures are widespread and often unjustified, the closures reduce ability to respond to fires and restrict access. Many bio-fuel technological breakthroughs are rapidly developing, it would be great to see each Ranger District work to utilize these technologies and processes in our rural communities. It seems like a win/win"for everyone.

Posted by **Rob DeHarpport** on April 04, 2010 at 06:49 PM CDT <#>

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Posted by **Rob DeHarpport** on April 04, 2010 at 06:50 PM CDT <#>

@ DLMurphy... You might want to look up "restoration" in the dictionary. I think what you are looking for is "re-invention". Restoration is defined as returning something to a previous state. In many cases, the Indians KNEW what their forests needed, and were very successful at accomplishing it. The consensus here seems to be; Let it burn and whatever survives or grows back will be "resilient" and highly desirable..... regardless of water quality, endangered species, old growth, cultural resources, etc.

Posted by **Fotoware** on April 04, 2010 at 07:35 PM CDT <#>

From my experience in western Montana year ago, because of the haphazard way the Forest Service goes about "restoration", we might as well save our tax money and forget this! Many of the seedlings are often found at the bottom of the mountain in a pile rather than planted.

Posted by **Jerry Smith** on April 05, 2010 at 04:38 PM CDT <#>

The Planning Rule should facilitate large scale (multiple hundreds or thousands of acres) of vegetation and fuels modification. The scale of work must be at the landscape. Finney (RMRS) and others have shown that the small scale patchwork approaches desired by many incrementalists are unlikely to mitigate landscape risk to large scale disturbances from fire, insect, disease, or other blights. Riparian and aquatic systems should be included in the matrix. Everett and others recommended "conservation of disturbance" as a key coarse scale strategy for enhancing landscape resilience to climate change, fire, and forest insects, and trees diseases. The current approach to fire control is both expensive and doomed to fail because disturbances are suppressed. In the long term, fire suppression is a doomed strategy that will require increasing resources that will "protect" fewer acres.

Posted by **John Townsley** on April 06, 2010 at 11:04 AM CDT <#>

We should use restraint and science based information to determine the best methods to enhance long term forest viability. Political and for-profit economic concerns should be secondary to biological planning that is based on experience and education rather than emotions and personal desires. The top problems with most forests in the west are too much dead fall from years of fire suppression and way too much destruction of the infrastructure from OTVs. Unauthorized trails should be closed and violators severely punished.

Posted by **Tom Reburn** on April 07, 2010 at 10:16 AM CDT <#>

It is critically important to incorporate a watershed based approach and landscape based approach to management decisions regarding restoration. The headwater areas on forested ridges are particularly vulnerable to any development because they provide nutrients for downstream aquatic organisms, which also supply food for other forest inhabitants. Because precipitation occurs in greater amounts on forested ridges than flatter areas, it is critical to the forest environment to maintain healthy forests along the ridges in order to facilitate groundwater recharge, reduce surface runoff, and store water (in trees) to help regulate water vapor in the atmosphere by evapotranspiration.

Posted by **Pamela C. Dodds, Ph.D.** on April 07, 2010 at 10:46 AM CDT <#>

Restoration is the treatment of forest and rangelands that are unhealthy because they are prone to catastrophic fire or have an unbalanced age class distribution and need some action to return them to a vibrant, healthy condition. That action can be anything that returns the forest to a healthy condition, whether that be timber harvest to achieve a mosaic of different vegetative species and age classes on the landscape, or thinning to space trees farther apart, or prescribed fire to remove a heavy accumulation of fuels from the ground or thin out a unusually thick stand of sagebrush. It generally means taking some kind of proactive action, not standing and staring at the forest.

Posted by **Jim Gerber** on April 07, 2010 at 11:46 AM CDT <#>

Returning anything, including the forest, to its previous state does not automatically create a benefit to the land or its inhabitants. The world is constantly evolving as it always has, and always will. The term restoration, in the context of forest planning, is highly susceptible to interpretation and may be misused or abused when describing efforts to effect change in current conditions. What time in history should and/or can a forest be "restored" to? It seems difficult to prove that any action under the guise of "restoration" can be of certain benefit to the forest, the Americans, or the rest of the world. Current terrain and vegetation damage can be addressed and rehabilitated. A nationwide policy of "restoration" could never be sufficient for the forest diversity contained within our coastal boundaries. Allowing local control of such types of actions often result in potentially subjective efforts at best. Restoration implies turning back the clock; we must look forward. Multi-use is the future. Management cannot restore any of our forests to their true "previous states". We have left our mark on Earth forever.

Posted by **Steve Graham** on April 08, 2010 at 09:44 PM CDT <#>

The term restoration is highly subjective and makes me uncomfortable when used loosely. At what cost to we attempt to direct and effect change? At what point is a forest considered "restored"? While damaged vegetation and terrain does exist, repairs are what are needed for our public lands, not restoration. Any apparatus which bears use by many requires maintenance, period. Restoration relates to turning back the clock. We have left our mark on Earth forever. Multi-use is the future and we must look forward. A tractor could be considered by some to be restored to its previous state by letting it rust to bits of iron ore and decomposed rubber trees, returning the oil to Earth. I fear that future generations may be heavily restricted in lifestyle opportunities because of biased opinions of what may be needed for our lands.

Posted by **Steve Graham** on April 08, 2010 at 10:17 PM CDT <#>

Rather than restoration, I would rather see the term reclamation used. Restoration implies return to a previous condition, but who defines that condition. Restoration is ill defined and potentially unattainable. Reclamation on the other hand implies activities which will return the land to viable pre-disturbance uses. In forest planning, I see the concept of restoration as opening the door to endless appeals. It potentially will be a show stopper for some activities. Given time, such as the 21 years since the fires at Lowman, Mother Nature will restore the land. Man wants to force the issues--often with poorly thought out plans that are wasteful. Take the concept of restoration out of the planning rule.

Posted by **Idaho roc doc** on April 12, 2010 at 03:20 PM CDT <#>

One of my first recommendations was to establish unassailable definitions that cannot be litigated in court, Steve. That would include "restoration", as I share your concerns about altering the meaning into "preservation". Many preservationists seem to be very worried about science not supporting their views on "letting nature take its course". The restoration of tree densities to match the annual rainfall seems to be the best way to go, as well as "restoring" historical species composition. Otherwise, forests will be replaced by fire-dependent species of brush and trees, like lodgepoles.

Posted by **Fotoware** on April 12, 2010 at 09:33 PM CDT <#>

Restoration of ecological function requires the preservation of mature and old growth forests, roadless areas, and viable populations of wildlife across their range. Forest Service

plans to log old growth forests indicates a lack of credibility and a stewardship ethic within the Forest Service. The new planning rule should greatly limit the agency's discretion related to logging of mature and old forests and maintain the current viability rule protecting wildlife. The agency keeps offering up planning rules the courts find illegal because they lack specific safeguards, and it looks like the agency is headed down that route again; wasting huge amount of time and taxpayer money for a rule the courts will only throw out, once again.

Posted by **Steve Holmer** on April 14, 2010 at 11:47 AM CDT <#>

@ Steve... The cutting of old growth has been all but banned in all of California's National Forests. Since 1993, the cutting of trees above 30" in diameter has been banned, along with ALL clearcutting. This was not a court-ordered result of a law suit, either. They did this voluntarily because not only was it the right thing to do for the unlisted California Spotted Owl but, it was the right thing for the forests. More Federal wildlife habitat has been consumed by catastrophic wildfires than logging in the last 30 years. Just for comparisons... My first timber sale in 1988 had an average diameter of 47 inches. My last timber sale had an average diameter of 14 inches.

Posted by **Fotoware** on April 16, 2010 at 03:59 PM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:32 PM CDT <#>

What this planning rule means to me is more job loss in a tough economy. What this planning rule means to me is I can no longer have access to my private property (I'm currently fighting the Payette National Forest RD, who closed my road without holding public opinion meetings on it). What this planning rule means to me is that the USFS can now hijack the process, go against public opinion, and enact the rule they feel is best for all of us whether we like it or not. Note: This has already happened in the Payette. What this planning rule means to me: More out of control wildfires, bark beetle infestations, increased sediment into the watershed from forest fires. In the Payette dramatic increases in mercury, lead, zinc, arsenic were released and washed into the river by natural forest fires. What this planning rule means to me: More jobs outsourced to Canada, China, Mexico, South America because we no longer can use our resources here, even though we are the most responsible culture with our resources. What this rule means to me: More environmental damage done in foreign countries, than would be done here with limited use and better oversight. What this rule means to me: The process is open to hijacking from environmental groups and the public is being kept out of the process.

Posted by **Scott Amos** on May 10, 2010 at 11:30 PM CDT <#>

Land management planning requires a holistic approach to ecosystem care (plant, water, species). This approach must recognize first that humans are a part of the system and two that "management" is not the approach that should be taken. Restoration and conservation must look at working with the natural order instead of trying to control it. Similarly, Restoration and Conservation are not compatible under the current definitions of these words. Conservation is often looked at as a completely hands-off approach that "allows the natural system to care for itself." While restoration requires significant "hands-on" work.

Under previous definition conservation does not work. Tribal peoples have for generations cared for forest and grass lands. The fact that the Sierra Nevada is a fire adapted ecosystem is a clear indication of this. Conservation must be defined as caring for lands in a matter that is consistent with the natural order, but acknowledges the positive role that humans can play (and in the case of indigenous people's has played) in the overall ecosystem. In the sequence of caring for the lands, currently forest and grass lands require a restoration to its condition when tribal peoples were able to access and care for these lands. In essence the lands must be restored from years of either "hands-off" or extensive clear-cutting. Tribes consistently point out that proper collaboration, consultation and cooperation between the Forest Service and Tribal governments would address the priorities identified by the Forest Service in its December 17, 2009 Notice of Intent to Revise the Planning Rule. Additionally, respect and utilization of traditional knowledge and practices has been identified as potentially playing a significant role in the restoring and then conserving (under the definition identified above) of forest and grass lands. For purposes of discussion collaboration should include engaging and discussing proposed actions prior to drafting any official plans, rules or policies (i.e. we are thinking of implementing this idea/policy/project, what are your thoughts?) Consultation would include government to government consultation. Finally cooperation with tribes would include contracting with Tribes to perform work on forest and grass lands; also recruiting tribal peoples to work for Forest Service. Cooperation is essentially working hand in hand with Tribes to implement the plans, policies and projects that were developed with their input. Please note that these comments are my understanding of the issues in my words, not the words of tribal people. First and foremost, the Forest Service must consult with Tribes directly and hear tribal concerns and recommendations in their words.

Posted by [Stephanie Lucero](#) on May 11, 2010 at 05:26 PM CDT <#>

## **April 2, 2010: Climate change**

We should forget about addressing climate change in the planning rule. Humans have no control over the climate. Climate is controlled by mega factors like tectonic plates, volcanism, mountain chains, ocean currents, sun spots, earth wobble, El Nino, the jet stream, and asundry other causes. When was the last time you heard someone say "Lets turn off the tectonic plate in the southern pacific ocean and move it to the northern atlantic ocean. Its getting to hot in the pacific ocean). Obviously, never! Can't happen because we have no control over the climate. If we include climate change in the planning rule that will only invite some group to appeal and litigate a forest plan because it did not address climate change "correctly". Do we really need more appeals and litigation?

Posted by [Jim Gerber](#) on April 02, 2010 at 11:50 AM CDT <#>

It is a flight of fantasy to pursue a strategy for defeating "global climate change", aka, global warming. This is a scientific and political hoax that has been perpetrated on the world for the purpose of limiting individual liberty and empowering government. The Forest Service should resist the temptation to morph into an agency promoting this propaganda through projects that will add nothing to the wealth of this nation and do even less for our climate. Projects designed to store carbon or limit carbon dioxide production when there is no clear evidence that carbon dioxide emissions have any significant affect on the global climate, is arrogance, or worse, outright fraud. If the Forest Service wants to be relevant and useful once again as an agency (and not just a megaphone for the political left), you

need to redouble your efforts to reduce the bureaucratic processes that prevent you from maximizing the production of products useful to mankind. Stop pursuing projects and strategies with grand sounding names (ie., ecosystem management, restoration, economic development) that are designed only to stimulate a warm public image but are without real substance. In case you haven't noticed, the Nation's debt is astronomical and headed higher(while the globe is cooling!!?). We no longer have the luxury of funding projects that don't offer a real return -- your planning needs to recognize this. Your planning should also be focused on lower public use for the National Forests in the future. Our demographics are changing; fuel costs are headed much higher; and disposable incomes are headed much lower. You have become a leisure-time agency that is likely to be much less relevant in the future unless you provide a product or service that is in demand. I believe you should plan to operate more as a business, instead of as an agency of recreational welfare, and become financially self-supporting. I also think that planning should consider the alternative of turning the national forests over to the states, to be operated under state laws and regulations -- that is, decentralize. This would allow local communities to have a greater voice in the decisions that affect them more than anyone else. It would also stop us from paying the environmental socialists for bringing their lawsuits against us, except where state laws might allow it.

Posted by **Ed Clutter** on April 03, 2010 at 09:08 AM CDT <#>

I agree with Jim Gerber. This whole global warming thing is a hoax. Only God can control the climate.

Posted by **Stan Jack** on April 04, 2010 at 02:46 PM CDT <#>

How could rules concerning "Climate Change" even be considered. The debate is certainly not over, unless of course the Dept of Ag. and the USFS are having policy dictated to them by the "wonks" in the Obama Administration. That said, I would agree with Mr. Gerber's comments, we can't control climate and we can't control the weather. I would certainly like to see this process advertised in rural communities much better, the lack of notice regarding this process is appalling but certainly not surprising.

Posted by **Robert DeHarpport** on April 04, 2010 at 06:33 PM CDT <#>

Since the beginning of the earth climate change has been part of its development. To think it is something man can control is erroneous. I see the attempt to control the environment as nothing more than certain types of individuals wanting control over people, telling them where to live, how to live, what to drive, what to eat, and just another avenue to gain power. It is all part of the UN and its Agenda 21 to make everything "sustainable", which has now become the catch phrase for everything. Pseudo-intellectuals, who are unable to be pragmatic and live in the reality of life promote these notions of controlling something. It is a travesty. I will take a farmer, rancher, or other worker of the earth, and listen to what he has to say about his knowledge from working the land over any over-educated pompous individual who thinks he knows what is best for me. When it comes time to feed me the farmer and rancher will know how to do it.

Posted by **Karen Schumacher** on April 08, 2010 at 11:23 PM CDT <#>

Please do not get mixed up with any climate change policy. It is unrelated and unnecessary.

Posted by **ROSS LARSON** on April 10, 2010 at 07:48 AM CDT <#>

Right on! Jim Gerber. Climate change--or what used to be called global warming--is nothing but a politicization of science. Climate has, is and will always change. There is nothing that man can do to stop it or change directions. Climate change has played an integral role in species development, a.k.a. evolution. Other species adapt to climate change. Man see himself as omnipotent and rather than adapt, man wants to control. Who are we kidding! With respect to the Planning Rule, the agency cannot develop a Forest Plan around something that constantly is changing. In the 70's we were facing global warming. Al Gore fixed that with global warming. Credible scientists are very divided on the climate change issues. How can you even begin to bring this concept into the Forest Planning process? Climate change should not be referenced in the Planning Rule.

Posted by **Idaho roc doc** on April 12, 2010 at 03:30 PM CDT <#>

I second this post by Ross Larson: Please do not get mixed up with any climate change policy. It is unrelated and unnecessary.

Posted by **Ron** on April 13, 2010 at 10:24 PM CDT <#>

Rather than specifying a particular threat (such as the flavor-of-the-month climate change) the rule could ask for the participants in the process to identify the threats FOR THAT FOREST that the forest plan COULD reasonably address over the 15 year planning period. Or the rule could direct that the planning process identify what would happen when any new significant threat was IDed. Many of the threats faced at the local forest level have to do with non-native invasive insects, diseases and plant species. These are real, not hypothetical. Now, if the whole climate change emphasis is really to develop carbon credit markets, then the Forest Service and USDA need to be more up front about it.

Posted by **treelady** on April 15, 2010 at 10:18 AM CDT <#>

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Posted by **stuart phillips** on April 22, 2010 at 10:32 PM CDT <#>

Tribal peoples have long worked with forest plants and animals for cultural, spiritual and other current and traditional practices (gathering, medicinal, spiritual, basket weaving, jewelry, etc.) Tribal peoples have traditional and long standing knowledge regarding plant growth, animal activities, animal and plant health, etc. They can gauge changes in climate and seasons in ways that "science" is unable to quantify. Coordination with tribal peoples would significantly improve the Forest Service's ability to proactively monitor, mitigate and adapt for climate change in a sustainable and effective way. Tribes consistently point out that proper collaboration, consultation and cooperation between the Forest Service and Tribal governments would address the priorities identified by the Forest Service in its December 17, 2009 Notice of Intent to Revise the Planning Rule. Additionally, respect and utilization of traditional knowledge and practices has been identified as potentially playing a significant role in the restoring and then conserving (under the definition identified above) of forest and grass lands. For purposes of discussion collaboration should include engaging and discussing proposed actions prior to drafting any official plans, rules or policies (i.e. we are thinking of implementing this idea/policy/project, what are your thoughts?) Consultation would include government to government consultation. Finally cooperation with tribes would include contracting with Tribes to perform work on forest and grass lands; also recruiting

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Posted by **Stephanie Lucero** on May 11, 2010 at 05:22 PM CDT <#>

## **April 2, 2010: Watershed Health**

In my opinion, and based upon conversations with a graduate of this institution, you might consider the expertise of graduates with degrees in geomorphology from the Carnegie Mellon Institute. It seems to me that their understanding of water sheds, management of and study of the earth's crust all tie in to the planning which you have proposed for these and other topics under discussion right now.

Posted by **Bernard P. Giroux** on April 02, 2010 at 09:26 PM CDT <#>

The Clean Water Act is being ignored by the current regime and, apparently, by everyone else associated with these new proposed rules. Apparently, unintended consequences resulting in depleted and hydrophobic soils, will continue to be ignored, with impacts lasting for decades, if not centuries. The big fire of 1910 still has areas not recovered. I suggest reading the soils study completed after the Biscuit Fire to see just how catastrophically-damaged those soils are.

Posted by **Fotoware** on April 04, 2010 at 03:43 PM CDT <#>

I really don't care if forest planning is done in the context of watersheds or not. What counts is the management practices that are being applied to the ground, not what kind administrative area they are applied to. You can apply management practices to a watershed, but if they are the wrong management practices, you can still have watershed problems. I think the planning rule should address both planning and management guidance. Planning direction in the form of goals and objectives and management guidance in the form of standards and guidelines and best management practices for clean water. The S&G's and BMP's help meet the objectives in an environmentally sound manner, which in turn help meet the goals for the Forest, which in turn help meet the DFC for the Forest. The Forest could work with adjacent landowners, as requested, to meet water quality and water quantity goals for everyone. Note this is on a request basis, not a Forest requirement basis. These are private lands and the FS has no control over them.

Posted by **Jim Gerber** on April 11, 2010 at 11:13 AM CDT <#>

Where feasible, please keep lakes open for boating activities.

Posted by **Ron** on April 13, 2010 at 10:21 PM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by [stuart phillips](#) on April 22, 2010 at 10:33 PM CDT <#>

Watershed health must look across jurisdiction to comply with water and environmental regulations, including tribal water regulations. Likewise, there is a significant link between watershed health and restoration of forest and grass lands. Watershed health is deeply dependent on the survival and thriving of native plants, and proper care for meadows and similar ecosystems. Meadows are the natural filters and water reserves within National Forests. However these meadows are often overlooked. At a minimum management plans should acknowledge watershed health as a priority and include in their minimum issues, increased efforts to consult with Tribes regarding culturally important areas and resources including meadows. Include a reduction and revocation of OHV use in important meadow areas. Tribes consistently point out that proper collaboration, consultation and cooperation between the Forest Service and Tribal governments would address the priorities identified by the Forest Service in its December 17, 2009 Notice of Intent to Revise the Planning Rule. Additionally, respect and utilization of traditional knowledge and practices has been identified as potentially playing a significant role in restoring watersheds. For purposes of discussion collaboration should include engaging and discussing proposed actions prior to drafting any official plans, rules or policies (i.e. we are thinking of implementing this idea/policy/project, what are your thoughts?) Consultation would include government to government consultation. Finally cooperation with tribes would include contracting with Tribes to perform work on forest and grass lands; also recruiting tribal peoples to work for Forest Service. Cooperation is essentially working hand in hand with Tribes to implement the plans, policies and projects that were developed with their input. Please note that these comments are my understanding of the issues in my words, not the words of tribal people. First and foremost, the Forest Service must consult with Tribes directly and hear tribal concerns and recommendations in their words.

Posted by [Stephanie Lucero](#) on May 11, 2010 at 05:45 PM CDT <#>

Collaboration, consultation and cooperation with Tribes is essential to protecting and enhancing water resources. Watershed health must look across jurisdiction to comply with water and environmental regulations, including tribal water regulations. Likewise, there is a significant link between watershed health and restoration of forest and grass lands. Watershed health is deeply dependent on the survival and thriving of native plants, and proper care for meadows and similar ecosystems. Meadows are the natural filters and water reserves within National Forests. However these meadows are often overlooked. At a minimum management plans should acknowledge watershed health as a priority and include in their minimum issues, increased efforts to consult with Tribes regarding culturally important areas and resources including meadows. Include a reduction and revocation of OHV use in important meadow areas.

Posted by [slucero](#) on May 11, 2010 at 06:22 PM CDT <#>

## **April 2, 2010: Plant and animal diversity**

The Endangered Species Act is being ignored in favor of letting wildfires burn, often at high intensities. Trading prime habitat for brushfields, snag patches and lodgepole thickets doesn't bode well for endangered species who are listed because of a loss of habitat. Some

endangered plants MAY show up when old growth trees are incinerated, and then re-burned, down the road.

Posted by **Fotoware** on April 04, 2010 at 03:48 PM CDT <#>

Diversity of plant and animal life should be accounted for by providing a mosaic of different vegetation species and age classes on the landscape. The wildlife species that use those different vegetation species and age classes will find and occupy them, and biological diversity will be preserved. We only need to find those wildlife species that are having a hard time adjusting to their changing habitats then and help them. Help them means find out what their habitat needs are and provide it, NOT stop all management. I think we should drop species viability as a way to provide diversity. No one could ever explain what species viability was or what it looked like if you ever did get it. With a mosaic of different vegetative species and age classes the location and junxta-position of those vegetation types would be the proxy for wildlife diversity, based on the assumption that a wide array of different vegetation types also results in a wide array of wildlife species. I believe that is an accepted principle, but if not, we can have a debate about the science.

Posted by **Jim Gerber** on April 05, 2010 at 03:15 PM CDT <#>

Since the beginning of time extinction of species has been part of the world. Why we now have people with nothing better to do than save every species on earth at the expense of human needs is beyond me.

Posted by **Karen Schumacher** on April 08, 2010 at 11:27 PM CDT <#>

While Forest Service land is in public ownership it is the states that oversee wildlife. And the driving force for this wildlife management is to kill it. I am especially concerned that special interests that profit from that killing like outfitters and guides combined with state game agencies who also profit from that killing by selling licenses have little incentive to properly protect wildlife communities or consider the overall impact of their management decisions. Some species, especially predators, are not allowed to fulfill their proper ecological roles of culling the weak and maintaining the balance. It is no accident that predators so heavily populate endangered species lists from wolves to lynx to bears. The pressure from hunters and the agencies that cater to those hunters to minimize and/or remove predators so that herbivores from ungulates to rodents are kept at un-naturally high levels is not a recipe for healthy, resilient biotic communities.

Posted by **Mary Katherine Ray** on April 09, 2010 at 10:35 AM CDT <#>

I think we need to remember the predicament our wild horses are in. Over 30,00 of them are in holding pens. Even though they were given 19 million acres under the 1971 Wild Horse and Burro Act, they are being forced from their homes and into holding pens, even possibly heading to slaughter. We need to protect these horses and return them to their land.

Posted by **Barb AZ** on April 09, 2010 at 06:27 PM CDT <#>

Here in the CNF in ga there was a time when the forest was a diverse habitat maintained for wildlife such as our ever decreasing Ruff Grouse .I can tell you from my walking that ther is not enough habitat to keep this glorius bird from being gone in my life time .I wish USFS

could take into consideration no management of the forest for wildlife will come back to bite you one day when all forest are old but no wildlife abounds in them for it takes all types of habitat to maintain a healthy forest for all to enjoy. Kurt

Posted by **Kurt Robbins** on April 15, 2010 at 02:17 PM CDT <#>

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Posted by **Kurt Robbins** on April 15, 2010 at 02:18 PM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:33 PM CDT <#>

## **April 2, 2010: How can the planning rule contribute to vibrant local economies**

As of now, looking at the summary, I see local communities NOT benefitting from this new Rule. The new Rule will only allow management within the WUI, and I don't see this WUI buffer as being very big at all. Eco-groups continue to blame landowners for living on their own land, not caring if the residents are burned-out, pioneer-style. Soooo, in rural ares, we'll see unintended consequences of reduced hospital viability, child poverty, increased illegal activities in the woods, potholed roads, higher unemployment, reduced school budgets and unreliable public infrastructure.

Posted by **Fotoware** on April 04, 2010 at 03:57 PM CDT <#>

Wildfire, insect epidemics, mass wasting, floods have one thing in common: They are disturbances that have landscape scale implications. WUI as a concept for management of landscapes has very limited utility. Wildfire can travel several miles in a single burn period; insect events (and accumulated forests diseases) at the landscape scale can create fuels accumulations that result in soil sterilizing fire intensities at a landscape scale; these events can combine to create conditions for gargantuan mass wasting that create conditions for large floods and debris dams. While efforts to contain wildfire and other disturbances with potential to cause property loss in the WUI need attention, the landscape itself is the key to maintaining viable communities and healthy rural economies. Current Forest Service management does not adequately acknowledge and address the landscape scale of natural forces, nor does it recognize or foster conditions that will mobilize and develop private and non-Federal capabilities to enable large scale solutions to landscape scale problems.

Posted by **John Townsley** on April 06, 2010 at 11:14 AM CDT <#>

You are not serious about soliciting comments. "your comment was marked as spam and will not be displayed" clearly shows the Forest Service is not interested in receiving thoughtful comments. While I am disappointed in the Forest Service for this, I am not surprised.

Posted by [John Townsley](#) on April 06, 2010 at 11:15 AM CDT <#>

Re: Townsley/spam comment. My apologies for incorrectly coding your comment as spam. It was not done intentionally. Sometimes the blog software automatically categorizes comments as spam - I don't know why. I didn't catch this and remove the spam indicator from your comment when I reviewed submissions earlier today. Again, please accept my apology.

Posted by [Barbara Timberlake](#) on April 06, 2010 at 12:50 PM CDT <#>

I attended the US Forest Service Region 5 Roundtable on the National Planning Rule last night, April 6, 2010 in Sacramento, CA. As an ambitious start to involving citizens in developing the new planning rule for the next to 10 to 15 years, I left feeling somewhat underwhelmed since forests in our region have indigenous species that live hundreds and thousands of years. We, the members of the current human population most heavily impacting our forests, need to humble ourselves to the forests themselves if we are to learn how to steward them. We have tremendous tools and technologies at our disposal to help reestablish more than mere "healthy forests". Suffice it to say, that the most learned environmentalists among us would find it virtually impossible to agree what comprises a "healthy forest". Is a healthy forest one which will provide the maximum yield timber harvest? What would a maximum yield timber harvest be? Would it be defined by region rather than ecosystem? How can we be so arrogant to even begin to think that we have the science available to dictate the correct answers to these, or a multitude of other relevant questions? If nothing else, the US Forest Service is asking for the the public input on developing the National Planning Rule. Rather than become a detractor to this process, I would prefer to be involved. My only hope is that Ecosystem Management, as it is developing in the National Planning Rule, will indeed be grounded in what will help restore indigenous ecosystems and micro ecosystems rather than supplant them with some other concoction under the blanket and vaguely defined concept of "healthy forests". The USFS Region 5 Roundtable on National Planning Rule collaborative process may prove to do more than assuage the public into thinking they can affect National Forest policy. Taking the Forest Service at it's word, the public was present and vocal, demonstrating their willingness to do their part. As long as special interests back in Washington do not subvert the process, we may indeed develop a National Planning Rule that will serve the best interest of indigenous biodiversity.

Posted by [Hersilliidae](#) on April 07, 2010 at 11:06 AM CDT <#>

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"healthy forest". Is a healthy forest one which will provide the maximum yield timber harvest? What would a maximum yield timber harvest be? Would it be defined by region rather than ecosystem? How can we be so arrogant to even begin to think that we have the science available to dictate the correct answers to these, or a multitude of other relevant questions? If nothing else, the US Forest Service is asking for the the public input on developing the National Planning Rule. Rather than become a detractor to this process, I would prefer to be involved. My only hope is that Ecosystem Management, as it is developing in the National Planning Rule, will indeed be grounded in what will help restore indigenous ecosystems and micro ecosystems rather than supplant them with some other concoction under the blanket and vaguely defined concept of "healthy forests".

Posted by [Hersiliidae](#) on April 07, 2010 at 11:08 AM CDT <#>

The "vibrant local economies" or "vibrant rural economies" heading is really inappropriate when what is being discussed are two of the legally spelled out multiple uses of the national forests - sustainable timber production and outdoor recreation. These uses benefit ALL Americans, indeed all people, not just living in the local communities. As such, these two elements of national forest management need to have a suitably prominent role in the new rule and not be marginalized as they were in the NOI. As for the "sustainable delivery of ecosystem services," I really wish the rule writers would use commonly understood English language terms and not feel compelled to create a new language understandable only to the elite few - or to no one: landscape scale, ecosystem services, adaptive governance, all lands approach, etc.

Posted by [treelady](#) on April 15, 2010 at 10:29 AM CDT <#>

We should not manage our forests for economic gains. We need to start preservation conservation - and stop the sustainable usage model. The planning rule should state that the first consideration must be to the well being of the forest - that commercial usage (timber, livestock, etc) of the forests should be phased out and that utilizing the forest for "goods and services" should be minimal and restricted and reduced so that less than 10% of all forest lands are utilized at all.

Posted by [CAnative](#) on April 16, 2010 at 08:27 PM CDT <#>

The concern about "timber harvest" and "economic gains" is unfounded and unnecessary. Timber volume in restoration projects is important as a vehicle to pay for non-commercial restoration. Currently, fire management burns a lot more than just trees. Along with the incineration of forests (and all the good things that go along with them), wildfires also burn up Forest Service budgets. Timber volume is a happy side effect of restoration forestry. Preserving "unnatural" landscapes has been proven to be a failure, as we have seen "protected" lands burn at high intensities. Restoration activities have been proven to lead to resilient and healthy forest ecosystems, as well as "vibrant local economies". We've "experimented" with our forests for long enough, and for the last 20 years, we've seen the catastrophic results. "Preservationists" will continue to support more wildfires, less management and increased forest destruction. This new rule is ample evidence that the old paradigm is dead.

Posted by [Fotoware](#) on April 19, 2010 at 11:01 AM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by [stuart phillips](#) on April 22, 2010 at 10:43 PM CDT <#>

The Forest Rule should provide for goods and services that contribute to vibrant local and national economies by developing a goal that provides for goods and services in the forest plan which, in turn, lead to vibrant economies. Then establish objectives that accomplish that economic goal; then monitor the objectives to make sure they are attained. If you don't meet the objectives you won't meet the goal of achieving a vibrant economy. An example might be a Forest (say the Wasatch-Cache) that sets an objective to harvest x amount of timber each year to support the local economy, and doing that would also meet some wildlife diversity goals. If the Forest does not meet that timber objective (harvest x amount of timber) the timber does not get harvested, which hurts the local economy, and the wildlife goals are not met, which hurts the wildlife.

Posted by [Jim Gerber](#) on May 06, 2010 at 11:44 AM CDT <#>

#### **April 2, 2010: Use and enjoyment of NFS lands**

Since the plan covers millions of acres of forest in the United States, I'd hope you would consider the hunting seasons in each affected state, preserve existing public shooting ranges, and maybe add a few. Too often new housing developments result in the closure of long-established public shooting ranges, due to safety concerns and common sense laws that prohibit firing at dwellings whether occupied or not (I quote one of ours). This means people have to head into the forest where there aren't any dwellings to practice. It would be great if you could add a few public shooting ranges to the plan.

Posted by [Frank La Dieu](#) on April 03, 2010 at 12:20 AM CDT <#>

As a bow hunter I feel that hunting is a viable management tool for game animals, and our national forests. Hunters bring in billions of dollars annually for our states, and state and national forests. Hunting has been part of our heritage since life began. Whether by rock, club, stick and string, or center fire or rim fired weapon. Each one of these pursuits has a place in, and is a suitable use of our national forests. All areas should be studied scientifically, and science should be used to manage these areas. Emotion has its place, but we are in the here and now. What do our forests need now to keep them healthy for our great grandchildren? How can we sustain them, not necessarily change them? We have enough access to our forest systems as they are. Those who want to get into them bad enough, will find a way if they try hard enough. Walk, hike crawl, or be transported by some one or some means.

Posted by [Bruce Cooper](#) on April 03, 2010 at 01:55 PM CDT <#>

I have two concerns. The first is all of the useless road closures that keep any off-road vehicles like quads from traveling old roads. I have seen areas closed off period or during hunting season and those places have been devoid of game. Hunters do not usually have access to a pack string of horses or mules nor the time to walk in miles for a day's hunt. Using a quad or motorcycles gives the average user the access to land his taxes are paying to maintain. In essence, my taxes are keeping me from accessing public land because I

don't have the time or means to travel them without some sort of wheeled transportation. During our travels over limited travel roads we have seen plenty of wild game. Elk, deer, bear and especially moose are not affected by a quad traveling through. We have had to stop many times to let these animals cross or travel the road in front of us, taking their time in doing so. The wildlife have become accustomed to the sound of these machines as they do to a logging operation when they are not being directly pressured. The bottom line is the National Forests belong to the citizens of this country and we should have access to these roads that have been turned into trails. We can all share these trails whether we choose to ride horses, quads, motorcycles, mountain bikes or would rather hike. Keeping one or more groups from accessing a piece of PUBLIC land only creates dissension and mistrust of the USFS. I have no problem closing some roads to pickups and cars as long as the off-road machines are not prohibited. My second concern is the possibility of recreational shooting or hunting being limited or banned on these same PUBLIC lands. As I stated before these lands belong to us and we have the right to use them for these recreational purposes as we always have. I realize that with the right to use the lands we also have the responsibility to take care of them by cleaning up and not destroying the terrain. With shooting and hunting also comes the responsibility of safety. Safe backdrops and knowing what's beyond the target are safeguards that any responsible shooter and hunter understands. Any person violating these safeguards should be criminally charged for their negligence.

Posted by **Mel Westlake Jr.** on April 04, 2010 at 01:12 AM CDT <#>

We'll see major impacts of forest visitors when wildfires rage through the landscapes. Campgrounds burned up, roads closed due to unharvested hazard trees, trails closed because of snag danger, streams fouled with accelerated erosion, weeks upon weeks of choking, unhealthy smoke (yes, my Uncle died from the smoke of the Cedar Fire), reduced tourist visits for decades and the loss of irreplaceable historical and natural features, including old growth.

Posted by **Fotoware** on April 04, 2010 at 04:03 PM CDT <#>

Please notify me of future round table meetings and events. Though I had requested of the Okanogan and Wenatchee National Forests to be informed of Forest Planning related events I learned of this process last night. Please place me on your notification list for products and meetings pertaining to the Forest Service Planning Rule. Access to the national forests by aircraft is extremely important to assure that all citizens have access to enjoy and experience wilderness and back country experiences. Many persons, including those with disabilities that preclude walking or hiking long distances, persons who are elderly, and persons who are injured or recovering from injury cannot access wilderness areas via the trail system. In some instances even accessing back country areas by road is not feasible. Personal aircraft operating on officially designated landing sites, including those located both on land and on water, are essential facilities to assure all US citizens can enjoy the benefits of our national forests and public lands. Just as hikers, equestrians, ORV users, snow machine users, boaters, and others have legitimate recreational interests in accessing national forest back country areas throughout the nation, the owners and operators of private aircraft need access to the public lands in all states of the union.

Posted by **John Townsley** on April 06, 2010 at 10:49 AM CDT <#>

Access to public lands managed by the Forest Service by privately owned aircraft should be permitted and encouraged. Private aircraft allow individuals who have disabilities to enjoy the back country, just as hikers and horseback riders.

Posted by **John Townsley** on April 06, 2010 at 10:53 AM CDT <#>

I just learned about this process this morning. Having flown private aircraft for 45 years I have enjoyed flying in to Forrest Service airstrips in the west for many years to camp, hike and just plain enjoy our great country. I want to strongly encourage the continued use and access to these landing sites as they not only provide benefits for firefighting and Forest Service management but enjoyment by hundreds of pilots who respect and enjoy these natural resources. I cannot imagine a more compatible use.

Posted by **Cliff Hanson** on April 07, 2010 at 09:10 AM CDT <#>

First off, I am in agreement with Mr. Townsley's comments. Public lands are just that, PUBLIC, and should be enjoyed by all citizens of this country. I think part of the emotional debate upon usage stems from a lack of respect of other users RIGHT to responsible enjoyment. I have used national forest land to mountain bike, dirt bike, atv, cross country ski, hunt & fish, hike/backpack, snowmobile, shooting, and for firewood (ha). Being involved in these diverse activities I never felt that one activity hindered the enjoyment of the other. On that note, I think users need to be educated on respecting other rights of enjoyment and responsible use. Second opinion - Volunteer. My brother and I have spent time in a local area we ride single track motorcycles on, cutting downed trees from the trail and building bridges across moisture and vegetation sensitive areas to minimize the impact of our riding. The Forest Service should look into volunteers for various projects - I know here you would have a good turnout. Third opinion - Each Region is not the same. The planning rule needs to be broad based and allow more power to local districts. Issues related to a Wyoming forest may or may not apply to a forest in Colorado. Fourth opinion - Access issues need to be broken down to user groups then probably down to ages and disabilities. Mr. Townsley had a good point that closing some of these areas off to motorized travel limits usage to the area to only those physically able or those with horses. Limiting accessibility to persons with disabilities probably is a violation of some handicap law. I would suggest restricted use in some areas to motorized travel to persons over a certain age and/or with a disability. Fifth opinion - I don't know about other states, but here whenever I go backpacking (15-20 miles base camp) I never see anyone, unless it is hunting season. Therefore, I think here, the user group in wilderness areas is somewhat small to the total population. Last opinion for tonight - As far as facilities go, I think the Forest Service is spread too thin here. More dispersed camping should probably be instituted. Camping education could be pursued as far as leaving trash, fires, human waste, etc. Probably could institute a program similar to the highway cleanup program to get people out to clean up camp sites after irresponsible or uneducated users.

Posted by **Dirk Montgomery - Medicine Bow - Routt** on April 08, 2010 at 02:06 AM CDT <#>

Second opinion - Volunteer. My brother and I have spent time in a local area we ride single track motorcycles on, cutting downed trees from the trail and building bridges across moisture and vegetation sensitive areas to minimize the impact of our riding. The Forest Service should look into volunteers for various projects - I know here you would have a good turnout.

Posted by **Dirk Montgomery - Medicine Bow - Routt** on April 08, 2010 at 02:10 AM CDT <#>

The forests of each state should be given back to the states to manage and out of the federal government hands. Each state is more knowledgeable about their forest needs than someone in DC.

Posted by **Karen Schumacher** on April 08, 2010 at 11:28 PM CDT <#>

Over my 55 years of usage of public land, I have seen nearly every piece of public land that I use and is administered by the Forestry Service closed or restricted to the point of effective closure. While I understand that the forestry service is badly undermanned and equally under-funded, the answer is not to close public land from the public. I'm not even sure it's technically legal to do so in mass quantities as it has been. I don't know of many people with anything good to say about the Forestry Service. Having said that, I appreciate the effort now being made to change the unhealthy state of affairs concerning public lands. As stated in a previous comment, ALL the public should be able to enjoy ALL the public land. Case in point: About 2 years ago, a few inconsiderate and malicious quad riders blasted through a rather delicate high desert area north of Phoenix AZ. The area was promptly closed permanently. This area had been in public use for decades by tens of thousands of hikers, shooters, fishermen and picnickers with little damage. The Forestry service does not have the manpower to provide a force to police these huge areas but a few brain-dead crazies should not be the cause of closure of thousands of acres of public land. Hunters, shooters and fishermen are the primary source of monetary support for the national public lands, this is as it should be, we use the land the most and I for one am proud to support it. However, thousands of hunters, fishermen and shooters are being run off public land every year with a corresponding drop in support. There are few target ranges and areas left, there should be more made available, possibly paid for by a small target shooting license renewable every year. Have every shooter read and agree to some basic common sense rules like no shooting within a quarter mile of a building and CLEAN UP YOUR MESS. The closure of public lands has got to be reversed. Quad, motorcycle and other four wheelers should help support the cost of public lands, again perhaps a small yearly license fee – again with the agreement to a few common sense rules like STAY ON THE ROADS. Arizona has implemented this kind of “you use it – you pay for it” scheme and it works. In my opinion, Arizona has taken it way too far and is trying to make up a budget shortage but the point is, it works and it works well. Use of public lands by the public is a right, but like all rights it is not limitless and this one comes with a duty to protect and to support the cost and proper usage of them.

Posted by **Randall Siler** on April 09, 2010 at 07:15 PM CDT <#>

I agree with several of the other authors - maintaining safe shooting ranges is an important and heavily used feature. My family frequently drive about 40 minutes to a nearby forest service range to shoot and we've never been there when there hasn't been at least 3 or 4 other shooters using the facility. Shooting is a family tradition for us and as private lands become more developed ranges on public lands become more important.

Posted by **Timothy Vienneau** on April 10, 2010 at 08:31 PM CDT <#>

Road closing is not working, and when they are close, only a very small number of people can realistically have access to these "PUBLIC LANDS", most of us are not capable of hiking into these areas. Look on how forbidding access & logging have let the forests get over grown diseased, adding to the threat of MEGA FIRES, and also adding to global warming/climit change WHEN they do burn. I am in Favor of off highway use vehicals, such as ATVs' motorcycles, and street legal 4wd trucks. If you would close some of the trails & roads during high runoff times in the spring, the erosion factor would be miminal. I would even be willing to register & pay an access fee for my vehicals to be used on PUBLIC LANDS. That way if there are abusers of the rules, it'd be easier to find them & prosicute them.

Posted by [jeffscycle](#) on April 12, 2010 at 12:32 PM CDT <#>

I second the posting by Karen Schumacher. And I add this: General guidelines can be written at the federal level, but individuals plans should be written at the state level.

Posted by [Ron](#) on April 13, 2010 at 10:30 PM CDT <#>

Using and enjoying National Forests should be for everyone. We all travel to these destinations for our own reasons but we share in wanting to be closer to nature. Deafening motorcycles disturb people and animals. Please include legislation that outlaws such horrible disturbance of peace, negligence for peoples right to enjoy nature and animals ability to be .

Posted by [Michael](#) on April 14, 2010 at 09:59 AM CDT <#>

The Tongass National Forest belongs to everyone in the US not just Alaskans. So of course there are outside interests in what happens to it. I don't believe we should allow the Tongass National Forest to be used to support the "occupation" of logging or mining the forest is just too valuable for that. People can find other kinds of work to make a living or move where there is work. I have had a number of different occupations in my life and people are always relocating because of jobs. This is one of the last Forests in the country because all the other Forests have been lost to development, logging and mining. I don't want to see the Tongass logged, developed, mined, or made into a park like all the other forests. I want to see it kept wild, and left standing as is.

Posted by [Lorraine](#) on April 14, 2010 at 11:48 AM CDT <#>

I detest user fees. I suspect Pinchot would oppose user fees. Realistically, however, they are here to stay. Pinchot was a brilliant master of personal relationships & politics, & was a realist. In that vein, I'd suggest that user fee opponents like me adopt a proactive approach to modify user fees to be based on resource impact - change them to "resource-impact fees". This strategy will change the political landscape in a way that ultimately causes anti-fee folks like me to support fees, while at the same time, stakeholders that don't care about fees (extractive industries, OHV, communications companies, permittees, &tc.) will stridently-opposed them! A "resource-impact-based fee" would charge users a fixed amount based on their impact on the resource, considering a variety of costs such as time-to-recovery, management costs, restoration costs, &tc. Such a fee would charge the least for someone hiking & camping, while mines, timber, OHV, comms sites, & permittees would pay based on the resource damage & management costs associated with their resource utilization, rather than taxpayers subsidizing their uses to the degree that it does now. We lost the rec-fee battle. Time to change the strategy. Let's turn the effort to forcing other users to pay their share based on the management costs & damage they cause! ADVOCATE user-fees for consumptive, extractive, & unsustainable uses! The logical conclusion of the fee-for-use approach that's been adopted would be conservation (or even preservation) - private resources would be cheaper to develop & extract than federally-subsidized use.

Posted by [on](#) April 14, 2010 at 10:08 PM CDT <#>

National planning rule  
o The word RULE should be changed to GUIDELINE.  
o Should be written to address the 50 states (and territories?) as a whole, written at a very high level (leave specifics to regional (cross state), state and local plans).  
o Incorporate guidance that lead to comprehensive Regional (cross state), State, and local plans.  
o As stated above, D.C. cannot write one comprehensive, detailed plan that addresses issues from Florida to

Oregon. The National level guidelines should outline what the subordinate plans should cover, encourage ideas, and not eliminate options. Blanket policies may even violate the 10th Amendment (Bill of Rights: "The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people."). Written well enough, the guidelines could stand for decades without the need for a rewrite. Regional, state, and local plans could be updated as required.

- o Written as above, a national plan could be short in length, and actually save money due to the abbreviated nature of the document.
- o Some of the plans will be less successful than others. Successful plans can be used to improve sub-par plans over time. With a national, one size fits all plan, there is no room for innovation. What works in the deserts of Arizona may not work in the woodlands of New York, but individual ideas developed in Arizona may aid New York in plan refinement. Use and Enjoyment of National Forest System Lands • What should the planning "guidelines" say about suitable uses?
- o Guidelines should specify Regional, State, and local plans should address suitable uses
- o Don't eliminate the possibility of new uses
- o Refer to use of forests as just that, use, leave the specifics to the Regional, State, and local plans
- What should the planning "guidelines" say about places of interest?
- o Guidelines should specify Regional, State, and local plans should address places of interest
- o Leave specific comments to the regional, state, and local plans.
- What should the planning "guidelines" say about access, visitor facilities, and services?
- o Guidelines should specify Regional, State, and local plans should cover access, visitor facilities, and services
- o Leave specific comments to the regional, state, and local plans.

Posted by **DavidF** on April 16, 2010 at 01:26 PM CDT <#>

Use and Enjoyment of National Forest System Lands • What should the planning rule guidelines say about suitable uses?

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- o Leave specific comments to the regional, state, and local plans.

Posted by **DavidF** on April 16, 2010 at 04:16 PM CDT <#>

I agree with: "Our nation's forest resources are perhaps more important now than ever. They need to be actively and sustainably managed to provide economic benefits, recreational opportunities, and such ecosystem services as biodiversity, clean water, and carbon mitigation." You touch on "recreational opportunities." Tie that recreational opportunity into Obama's "Let's Move" "program to end the American plague of childhood obesity in a single generation." Now, you are pulling in other stakeholders into your program, increasing your visibility. Get the kids off the couch and into the forests. Skin up thier knees and they'll be better off for it.

Posted by **DavidF** on April 16, 2010 at 04:25 PM CDT <#>

We should keep in mind that if it is not allowed in the planning rule, it will not be in the forest plan. And if it is not in the forest plan, you can't do it on the national forest. So if you enjoy parachuting out of an airplane and landing on national forest land, you should make

sure it is allowed in the planning rule. That is our responsibility to see that it happens, not the Forest Service's.

Posted by [Jim Gerber](#) on April 18, 2010 at 11:36 AM CDT <#>

Need to add Mountain Scootering to the "rule." Don't want to forget that one. My point in not being exclusive is immediatly above. My wife mountain scooters, kind of like a mountain bike, but, not. If it's not in the plan, then, my wife would not be able (technically) to mountain scooter. What about mountain roller blades? Kite biking? RC car driving...

Posted by [DavidF](#) on April 22, 2010 at 04:21 PM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by [stuart phillips](#) on April 22, 2010 at 10:44 PM CDT <#>

The new planning rule should develop direction for plans to be more balanced. The old plans were basically bio-centric, focusng on vegetation and wildlife far more than non-consumptive uses of the national forests. As populations next to forests grow, the value of the forests for open space, scenic quality, amenity values, for outdoor education, for recreation, for spritual renewal will only increase. The current National Forest plans do not provide good direction to manage over use, they don't deal with recreation capacity issues, they basically fail to acknowledge the economic contribution of the recreation and tourism industry to small communities dependent on national forests. The next generation plans should make capacity (recreation use levels)decisions that balance the economic contribution of recreation and tourism without negatively damaging the resources that sustain the industry. Recreation (in the broader sense of activities, infrastructure, Wilderness, tourism, scenic resources) should be treated as a core value and mission of the agency instead of being treated like it is now as a negative impact that needs to be "dealt with" and "mitigated". I also think that the planning rule needs to eliminate those fuzzy words like "resilient" "sustainable", "ecosystem services", "restoration", "healthy". No one knows what you mean. If you insist on using those words you need to define them in everyday english. And Lastly, the new planning rule should require plans to contain real decisions on appropriate uses of specific places based on ecological values. Standards and guidelines should be written that guide decisions instead of establishing "targets". There needs to be an acknowledgement that different forests have different values based on the cumulative picture in the United States. For example, the Northern Rockies ecocsystems still have some integrity left and it's value to the Nation is probably wildlife habitat for animals that require vast tracts of wildland. The only place left in the lower 48. So it would make sense that protecting wildlife habitat in Montana and Idaho would be more important to the nation than some short term wood products that you might extract from the same tracts of land. I support the ALL lands approach to planning. The context of the forest influences the values of the resources contained within it. And lastly, the Planning Rule should acknoweldge that the national forests are outdoor classrooms for educators to help educate Americans about how to be land stewards. The future of national forests will depend on our citizens taking an active role in taking care of them. You can't value what you don't understand, and you don't save what you don't value.

Posted by [MarGor](#) on May 06, 2010 at 05:35 PM CDT <#>

Well then, MarGor, let's take the Bitterroot. At least 60% of the Forest is dead or dying, including high elev "potential lynx habitat" (protected from ANY mgt). How do we value that land as recreational and/or wildlife habitat, with it being vast areas of snags, fallen and still standing? We've seen the results of doing that up in Ore. & Wash., with the spotted owl locking out forest mgt. Weeks of choking smoke, closed trails, burned campgrnds, snag forests & ugliness for years tends to keep the tourists away. OTOH, "park-like forests" that have been thinned, with nice shade below the towering "leave trees" make for a nice forest visit, while supporting endangered species & adding wildfire safety. In 2007, smoke choked N. Calif for 3 months during the summer. In fact, that smoke drifted all the way to Yellowstone! Urban people just don't see the "big picture", & they have the voting power to mandate the "unintended consequences" of their selfish folly upon us rural folks.

Posted by [Fotoware](#) on May 07, 2010 at 05:25 PM CDT <#>

#### **April 1, 2010: Comments on discussions at the First National Roundtable**

The Forest Service has lost its connection to it's mission statement that Gifford Pinchot so eloquently spoke of 100 years ago. That mission is embodied in what constitutes, "the greatest good for the greatest number for the longest time". The Industrial paradigm embodies the opposite, the greatest good for the fewest number for the shortest time, and then has left multiply legacies of externalities and unintended consequences (restoration needs) that last for generations without any ability to pay. This recent history of the Forest Service represents an abandonment of its mission. How you can find a way back is the key challenge for today and tomorrow. Is there the will to reverse this history and return to the wisdom of Gifford Pinchot? Time will tell, and our grandchildren will inherit the legacy of those choices. Remember that every time you look into the eyes of your grandchildren. I do.

Posted by [Craig Patterson](#) on April 01, 2010 at 06:44 PM CDT <#>

It is very interesting to hear from the different regions of the National Forest System. I would like to see this new planning rule lead to a methodology that takes a more holistic approach to the system. I hope it achieves something that is coherent philosophically, procedurally and in practical reality. That we stop saying one thing and doing another. The National Forest System is an opportunity to effect solutions on a broader scale that cannot be accomplished on the local or even regional level. The National Forest System's connections to agriculture and rural development makes it uniquely positioned to play an important role in tackling challenges that have been identified in the Science Forums such as scientific literacy, concerns for ecology, economics and society. The Forest Service should not relinquish control of the National Forests to commerce but rather manage them for the sustained yield of all their values. I look forward to participating in the National Planning Rule Roundtable in my region.

Posted by [ccairnes](#) on April 01, 2010 at 06:44 PM CDT <#>

There are soooo many things not working for the Forest Service today. 1) Reponse to litigation; Fed lawyers are inadequately prepared to defend conflicting rules, laws and policies. 2) Poorly trained and inadequate workforce to accomplish ambitious, complicated plans on the ground 3) Federal McForestry; a revolving door of temporary employees who do the actual fieldwork 4) No way of dealing with "professional litigants" who are simply in it for the buck\$ 5) the economically and environmentally destructive Let-Burn program HAS to end! 6) Protections MUST match the conditions on the ground e.g. 300 foot stream buffer

boundaries outside of the watershed 7) Continued "Analysis Paralysis", including this new Rule, while forests die, rot and burn at high intensity... I could go on but real life calls

Posted by **Fotoware** on April 02, 2010 at 10:34 AM CDT <#>

ANILCA is not working. Or rather the USFS and other agencies are disregarding the intent of this law with impunity for the present time. This is insane to destroy private property rights and expect the country to prosper. I Support private property rights encoded within the intent and plain language of ANILCA which remains completely unavailable for the home owners. Forests within cities should not be designated as "wilderness". Anchorage Alaska is not a wilderness. It is a city. Anchorage has roads. It should not be designated a wilderness within its boundaries as appears to be the case.

Posted by **Jo** on April 08, 2010 at 01:55 PM CDT <#>

I would like to lose the "agency preferred alt." from the planning rule. When present it gives the F.S. a "dog-in-the fight" so to speak, and the agency will fight long and hard to make sure its preferred alt. makes it to the end of the planning process so it can be selected. The F.S. will even eliminate other alternatives from the alternative selection if it believes that alt. may compete with its preferred alt. This is not an open, decision-making process. Alternatives should be developed at the local level by people who live in the area and depend on the NF's to make their living and to use and enjoy. The FS has the right, and obligation, to choose the final alternative, but it doesn't have to be the agency preferred alt. It could be an alt. that was developed locally. Even if someone's own alternative was not selected, a person would be more likely to support the final alternative if he knew it was locally derived, and not an alt. developed by the federal government and forced down his throat. I would also lose "species viability" as a way to achieve species diversity. No one could ever explain what species viability was, or what it looked like if you ever did get it. Instead, use a mosaic of vegetation and age classes on the landscape as a proxy for wildlife diversity. This is based on the principle that some species of wildlife use early seral veg types but don't use older age classes, and other species use older age classes but not young age classes. Maintain a mosaic of vegetation species and age classes on the landscape and the wildlife species will find their habitat, and diversity will be maintained. Thirdly, I would lose the roadless areas. They are relics of the past. Roadless areas have been replaced by one or more management prescription areas on each forest. Those prescription areas were established through an open, decision-making process by the American people and now prescribe the type of management that will occur there. Roadless areas are irrelevant.

Posted by **Jim Gerber** on April 13, 2010 at 12:29 PM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:44 PM CDT <#>

Related primarily to "Use and Enjoyment of forest lands" and their "contributions to local economies": What is NOT working is all the "set-aside" land (wilderness, WSA, roadless, conservation areas, etc., etc.). At what point is there "enough" land set-aside for certain "special interest groups"? 1. Set-aside lands produce very little source for taxes. Compared to true "multiple use" areas, the small amount of taxable contribution to the management of the land is minimal. 2. By setting land aside for these "special interests", other uses are

confined to a smaller area which compounds the amount of use on the remaining area. Especially trail head areas are inundated with increased use as they are the only focal points. Wider dispersal is no longer possible.

Posted by **Jerry Smith** on April 03, 2010 at 10:51 AM CDT <#>

3. With increased use on fewer areas comes increased degradation and over use... increased management problems. 4. True "multiple use" produces more tax revenue from "All" the many users and uses that help both local and national economies. If congress would use these taxes for management and improvement of these "multiple use" lands, there would be significant improvement over-all. (think the revenue generated and used from hunting licenses and sporting goods sales does not benefit the land, wildlife, and user experience?)

Posted by **Jerry Smith** on April 03, 2010 at 10:52 AM CDT <#>

I would like to keep the basic guts of the planning rule. That is: Develop a Desired Future Condition for a Forest; develop some guidelines to meet that DFC; develop some objectives to meet the goals; develop standards and guidelines to meet the objectives in an environmentally sound way; locate management areas on the ground that have specific S&G's for that management area; and then monitor the objectives to make sure they are being met. If you don't meet the objectives you don't meet the goals and if you don't meet the goals you don't achieve the DFC for the Forest. You can have the best S&G's in the world, but if you don't monitor to see if you are meeting them you will never achieve the DFC. All the rest is peripheral information. Some things, like climate change, will actually detract from developing a good plan because you will have to spend an inordinate amount of time on something that humans have no control over anyway.

Posted by **Jim Gerber** on April 04, 2010 at 11:45 AM CDT <#>

The 1982 Planning Rule is not broken. It can be updated through amendments. The governing Planning Rule should be a simple framework under which the many varied forests in our nation can develop individualized plans. Keep it simple with realistic guidelines. Develop a means to balance environmental protection with the needs of local communities. There will be times that environmental issues will take precedence. There will be times that human needs will. It really will be ok. Standards and guidelines need to be developed for local managers to attain their goals. I agree with Jim Gerber that issues such as climate change will detract from the process. Develop local collaboration to identify Desired Future Conditions and use objectives for local Forests. Figure out a way to manage the appeals which cripple our system and cost the taxpayers an inordinate amount of money. The Equal Access to Justice law needs to be reviewed in terms of cost to taxpayers. Special interest groups have made appeals big business. Sorry I know that is out of the scope of the Planning Rule, but until that travesty is handled, no Planning Rule will ever work.

Posted by **idaho roc doc** on April 12, 2010 at 03:45 PM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:35 PM CDT <#>

A great planning rule contains a Desired Future Condition for what the forest should look like, and be like, in 50 years; some goals to get us to that DFC; objectives to achieve the goals; standards and guidelines to meet the objectives in an environmentally sound manner; and management area prescriptions that provide guidance for management of specific areas of the forest; all of which provide a mix of goods and services for a wide array of American people while maintaining the long-term health of the Forest. Piece of cake, right!

Posted by **Jim Gerber** on April 03, 2010 at 11:30 AM CDT <#>

I think we need a sincere and detailed plan of how they will implement these complicated ideas BEFORE the plan is signed into action. Again, I think FS employees do fear the definite potential of litigating this plan solely on the basis of inadequate expertise to implement it. In fact, if I could find a lawyer to partner with, I would definitely throw my own "monkeywrench" into the fray, while collecting a nice fee for my "services". If you have ever monitored the implementation of projects, you would know, without a doubt, that this "inconvenient truth" is, indeed, a major problem. Expand this problem to the scale that the new rule is supposed to address and, you'll see my concern.

Posted by **Fotoware** on April 04, 2010 at 04:19 PM CDT <#>

Senate Bill S. 1470, Forest Jobs and Recreation Act of 2009 can serve as a template of collaborative rule building and planning. The bill was developed in Montana by Senator Tester with the collaboration of timber companies, loggers, recreationists, etc. It is a bill that seems to provide forest benefits and habitat improvement to benefit wildlife, fish, employment and forest users. A description of the development of this bill and its benefits may be found in the Spring 2010 issue of Trout the magazine of Trout Unlimited.

Posted by **Stanley Backlund, Trout unlimited** on April 12, 2010 at 01:42 PM CDT <#>

Maintain healthy species populations and restrict destructive human activities! Your update does the opposite, please revise and ensure that the forest service maintain healthy species populations and restrict destructive human activities! on public forest land.

Posted by **stuart phillips** on April 22, 2010 at 10:35 PM CDT <#>

I support requiring winter travel planning in the new Forest planning rule. There are mountains of new research on the negative social and ecological effects of OSVs and other forms of motorized recreation. Its time for the FS to control the unrestrained growth of motorized winter recreation.

Posted by **Thomas Turiano** on May 15, 2010 at 08:14 AM CDT <#>

It is very interesting to hear from the different regions of the National Forest System. I would like to see this new planning rule lead to a methodology that takes a more holistic approach to the system. I hope it achieves something that is coherent philosophically, procedurally and in practical reality. That we stop saying one thing and doing another. The National Forest System is an opportunity to effect solutions on a broader scale that cannot be accomplished on the local or even regional level. The National Forest System's connections to agriculture and rural development makes it uniquely positioned to play an important role in tackling challenges that have been identified in the Science Forums such

as scientific literacy, concerns for ecology, economics and society. The Forest Service should not relinquish control of the National Forests to commerce but rather manage them for the sustained yield of all their values. I look forward to participating in the National Planning Rule Roundtable in my region.

Posted by **ccairnes** on April 01, 2010 at 06:34 PM CDT <#>

So far, the Rule has a complete disregard for "cultural landscapes" that existed from 1400 to 1700. Those were very diverse, healthy and resilient landscapes that were managed by expert American Indians. They knew when, and when not to set fires to safeguard their homes and food sources. Their Let-Burn policy worked because they were free to manage their lands, with very few limitations. Their forests didn't have the extreme fuel problems that today's forests have. In contrast, today's illegal Let-Burn program allows fires in choked, unhealthy forests during the heat of the summer.

Posted by **Fotoware** on April 04, 2010 at 04:27 PM CDT <#>

Follow-up to comment from the floor: The Forest Service used to have the type engagement forums that were mentioned. See, e.g. Eco-Watch Policy Dialogues: <http://www.fs.fed.us/eco/eco-watch/ecowatch.html> The software used was Hypernews. The forums ran from the late 1990s until the FS stopped supporting it in the early 2000s. Too bad they stopped. If Hypernews were resurrected, the Eco-Watch archived forums would be available for "history." I have most on flat files and will unearth them sometime later this year if the FS fails to resurrect them. Still, the Eco-Watch forum information (main posts and some aggregated comments) from 1990-1999 are a useful resource to see what folks were saying about planning, management, collaboration during that era. A Google search of "forest policy" will also unearth several blogs I've run since on forest policy, adaptive management, ecology and economics, and FS follies re: environmental management systems.

Posted by **Dave Iverson** on April 01, 2010 at 09:25 AM CDT <#>

With climate change being exposed as junk science I would suggest it not be used in the planning rule. Local input from resident citizens and community governments is critical to proper management and should be elevated to the highest requirement of Federally managed public land planning. Many western states and counties of western states are largely made up of federally managed public lands and as such states and counties need input into planning to preserve their economic tax base and provide for a sustainable community. This in turn provides the vehicle to enhance and protect the environment. Under the Equal Access to Justice Act environmental groups are raking in billions of tax payer dollars from frivolous lawsuits. It is not about saving the environment anymore but in reality it has become a business for many of these green organizations. The new planning rule should address this by a rule of bonding actions brought against government agencies. This may reduce those actions of litigation. The planning rule must be streamlined to reduce time of planning action and also cost. Many NEPA required documents take years to produce and millions of dollars of tax money. Collaboration, cooperation and most importantly coordination with local citizens and governments should be the starting point of all planning during the scoping.

Posted by **CBU** on April 01, 2010 at 09:36 AM CDT <#>

I don't understand how Defenders of Wildlife can say it is an experiment and then say they want sustainability. He says measurable is the key yet the destruction of our forests by disease, even though it is measurable, is never considered. I do not feel that I am hearing anything from the Defenders of Wildlife speaker about what needs to be contained in the new planning rule. He seems to be stuck on how his organization would like to manage the forest.

Posted by **CBU** on April 01, 2010 at 10:02 AM CDT <#>

I am seeing a conspiracy-like situation arising here, with modelers and researchers wanting to ignore existing data, in favor of new data they can "adjust" and "model", all the while enjoying the massive influx of BUCK\$. We already KNOW how to restore ecosystems through active management, whether it is in the form of a timber sale, prescribed fire or simply handfelling of small, unmerchantable tree, or anything in between. The "scientists" want to reinvent forest management into something that hasn't been tested, except through modeling, which they can control with adjusted data. Meanwhile, the other obstructionists continue to embrace catastrophic wildfires, and their horrific effects on wide-ranging ecosystem services.

Posted by **Fotoware** on April 01, 2010 at 10:50 AM CDT <#>

One would wonder how drug cartels get established in forests and it seems to be relatively simple. As you remove visitors from the forest as the FS has done by closing and reducing multiple use recreation of trails and roads it stands to reason that the folks who monitor the users of the forest (visitors) are reduced. 98% of the forest users in the Beaverhead Deerlodge National Forest recreate in areas designated as multiple use and less than 3% recreate in wilderness areas. I would submit that drug cartels are using those areas of the forest that multiple use recreation has been removed and they set up shop in remote areas with less chance of the public coming across these operations. The policies and direction of the FS has enabled these cartels to operate.

Posted by **CBU** on April 01, 2010 at 11:01 AM CDT <#>

How can we implement these huge, grandiose ideas that finally make it into a new Planning Rule, without a qualified future workforce? I suggest that a lawsuit could cause a national moratorium on ALL forest projects until an adequately skilled workforce can be employed.

Posted by **LAH** on April 01, 2010 at 11:06 AM CDT <#>

Question for the panel: Is it feasible for the Rule to focus ENTIRELY on the PROCESS of creating a plan? No discussion of the issues but strong language and standards for HOW Forest Plans engage the public to define and address their issues.

Posted by **Bruce Meneghin** on April 01, 2010 at 11:06 AM CDT <#>

Wiki Challenge to Wicked Problems: Why not set up a Wiki for the NFMA Rule? That way, folks could see (and comment in real time) on developments. If the FS wants to get wildly collaborative, allow for competing (and/or complimentary) NFMA rules to be developed simultaneously on the Wiki and let folks start and join-in those efforts as they choose. That way the agency can keep control of its rule development but might learn for what others are doing. Is it finally time for true collaboration? Note: I choose not to call it a "planning rule"

since Planning is far too narrow a "field of vision" for what is at stake in national forest management.

Posted by **Dave Iverson** on April 01, 2010 at 12:21 PM CDT <#>

Science/management question: Why do I so often hear "risk and uncertainty" and seldom hear "novelty, surprise, and ignorance." My adaptive management reading leads me to believe that "surprise is unexceptional", novelty is ever-present, and ignorance is standard practice.

Posted by **Dave Iverson** on April 01, 2010 at 12:56 PM CDT <#>

Will the new rules address the lack of NEPA compliance on "free range fires" that the fire folks enjoy (both in their pocketbooks and resumes)?? We cannot keep turning \$3000 lightning fires into \$30 million firestorms. A "natural ignition" in an "unnatural" forest does not make it into a "natural" wildfire, especially in the middle of our hot, dry summers.

Posted by **Fotoware** on April 01, 2010 at 03:31 PM CDT <#>

I guess I should have been more specific in my comment on the workforce. The planners and "ologists" tend to have LOTS of experience and knowledge but, have been isolated from the actual implementation of complex plans and projects on the ground. There is some value in considering the depleted workforce of foresters and techs, who are the ones who have to apply the project specs to the actual ground. If you overdesign the plans so that they cannot be implemented by our existing workforce, mistakes will be made that can stop a project in its tracks. For example, multiple stream buffer sizes can easily be mixed up, or even just botched by inexperienced personnel. BMP's can be violated by employees who do not even know what they are. (continued)

Posted by **LAH** on April 01, 2010 at 04:21 PM CDT <#>

(continued) Very commonly, timbermarkers and contract inspectors learn the job as they go along instead of being fully-qualified from the start. Using fire folks for natural resource projects has had, generally, poor results. Many FS timber shops would rather hire people off the street and train them instead of using a GS-8 "Fire God" after the temps run out of days. Litigious groups are, more and more, out there in the woods "ground-truthing", and they WILL find mistakes, both big and small. Leaving this issue out of the loop will have major impacts down the road.

Posted by **LAH** on April 01, 2010 at 04:21 PM CDT <#>

It is very interesting to hear from the different regions of the National Forest System. I would like to see this new planning rule lead to a methodology that takes a more holistic approach to the system. I hope it achieves something that is coherent philosophically, procedurally and in practical reality. That we stop saying one thing and doing another. The National Forest System is an opportunity to effect solutions on a broader scale that cannot be accomplished on the local or even regional level. The National Forest System's connections to agriculture and rural development makes it uniquely positioned to play an important role in tackling challenges that have been identified in the Science Forums such as scientific literacy, concerns for ecology, economics and society. The Forest Service should not relinquish control of the National Forests to commerce but rather manage them for the

sustained yield of all their values. I look forward to participating in the National Planning Rule Roundtable in my region.

Posted by [ccairnes](#) on April 01, 2010 at 06:31 PM CDT <#>

### **March 23, 2009: Thoughts on the upcoming Science Forum in Washington, DC, March 29-30, 2010**

How about NOT tie the science panels to the subsequent discussions. Why does the Forest Service always lead with "science"? I'm not against science, but the pretense here seems to be that science will find an answer to the wicked problem webs that the Forest Service finds itself caught in. Science does not have the answer to adaptive management/working politics questions that are the substance of forest management. But maybe that's the whole idea: Parade out the scientists, then conclude the obvious that the "rule" must set a stage to put science in dialogue with management and both in dialogue with the public in trying to manage our nation's forests. We cannot leave science out, but we can't over-stress its importance either. If science doesn't provide "hiding cover" for forest managers, where will they hide when faced with the highly controversial management calls that come with the territory. Certainly they must be given a place to hide. :) PS.. Get a real blog! Not you, Peter. But you the USFS and the USDA.

Posted by [Dave Iverson](#) on March 26, 2010 at 05:22 PM CDT <#>

I would very much like to see an emphasis on how we will be attempting to deal with restoring forests to historic baselines, including tree densities and species compositions. There are solid facts that support a need to deal with these issues before we see any talk about "saving forests from global warming". Remember, "preservation" strictly excludes any "restoration" of our forests. Much of the public thinks that merely designating forests as "Wilderness" will protect forests from accelerated mortality. In the west, that often really means just the opposite, a guarantee of neglect.

Posted by [Fotoware](#) on March 26, 2010 at 06:32 PM CDT <#>

To help those of us looking on by webcast. Please move the Closed Captions away from the slides. They are covering most of the bottom section of the slides making it impossible to read the slides.

Posted by [Anonymous](#) on March 29, 2010 at 09:19 AM CDT <#>

I have forwarded the comment about the captions blocking the slides to the Science Forum team and they are trying to make adjustments.

Posted by [Barbara Timberlake](#) on March 29, 2010 at 09:37 AM CDT <#>

Thanks for webcasting this!

Posted by [Anonymous](#) on March 29, 2010 at 09:49 AM CDT <#>

The second panelist, Jim Vose, mentioned and showed a map that combined experimental forest sites and other locations including potential NEON sites. However, he did not mention the SCAN and SNOTEL sites (USDA-NRCS) that provide soil moisture and temperature

information throughout the US including Alaska. These are important monitoring networks whose information contributes to total watershed balance and should not be forgotten in this discussion. (USFS has co-shared costs for some of these locations as well.)

Posted by **Carolyn Olson** on March 29, 2010 at 10:23 AM CDT <#>

I have to applaud the panel for seeing the "Precautionary Principle" as it really should be. All too many "preservationists" do indeed use it as the "blunt cudgel" to stop any forest management project. Where is the "Precautionary Principle" when fires and bark beetles are ravaging our forests? The big eco-groups, as well as the last two Administrations, all advocate letting forests burn, usually at high intensities, despite the horrific impacts. Without proper legally-required NEPA analysis, these Let-Burn policies are perfect examples of where the "PP" is ignored. Also, I'd like to see the panel address the problems of soils damage in high-intensity wildfires. The soils study after the Biscuit Fire shows just how damaging and long-lasting the impacts are. Another issue I'd like to see addressed is the Donato paper about the Biscuit Fire.

Posted by **Fotoware** on March 29, 2010 at 12:06 PM CDT <#>

Thanks for the feedback regarding the captioning. Unfortunately, we were unable to resolve the issue. We will work to fix it for our next web cast.

Posted by **Planning Rule Team** on March 29, 2010 at 01:28 PM CDT <#>

Can webcast viewers submit questions to the panel tomorrow?

Posted by **Bruce Meneghin** on March 29, 2010 at 02:58 PM CDT <#>

Question for any FS person on today's afternoon panel: The FS research community has the most person-power with the technical skills necessary for good monitoring. Is the research reward system set up to give researchers incentive to contribute their skills of sampling design and analysis to work that would not be publishable?

Posted by **Bruce Meneghin** on March 29, 2010 at 03:08 PM CDT <#>

We will do our very best to include questions submitted to the blog tomorrow.

Posted by **Barbara Timberlake** on March 29, 2010 at 03:54 PM CDT <#>

The afternoon portion of the forum made me think more and more "analysis paralysis". With more than 7 million acres of bug-killed forest, how much more data and analysis do we need to invoke the "Precautionary Principle"??? With fire seasons estimated to burn more than 10 million acres annually, how much more "modeling" do we need to know that some forests are going away for a very long time? Most of my Forest Service career was spent doing salvage sales. Will the benefits of careful salvage logging be addressed at some point? I do know that the big eco-groups have promised to litigate any and all salvage sales, ignoring the facts that re-burns in unsalvaged timber are often more devastating than the initial stand-replacement fires. The botched Yosemite burn last year shows very clearly the damaging effects of not salvaging dead timber and reducing fuels. This problem needs to be addressed, as fires and insects will continue to do their damage in our unhealthy forests.

Posted by **Fotoware** on March 29, 2010 at 05:11 PM CDT <#>

Regarding wildlife populations dependent on habitat, why can't we simplify things by managing for big trees? Most of these endangered species are there because of "habitat loss". I contend that we can IMPROVE and enhance these habitats through active forest management. Currently, habitat areas are off-limits to active management and are being degraded by neglect and "unstewardship".

Posted by **Fotoware** on March 30, 2010 at 09:54 AM CDT <#>

For anyone on the panel: Should the Planning Rule try to provide a definition of Sustainability OR should the Rule command individual Forest Plans to create a local definition of what should be sustained, for whom, for how long and at what cost?

Posted by **Bruce Meneghin** on March 30, 2010 at 10:23 AM CDT <#>

Consensus?!?! Eco-groups do NOT want consensus, VERY happy with their court winnings (and profits). They don't care if forests die, rot and burn, claiming that outcome is "natural". Like some speakers have been saying, it is not about the science but, the human social faith-based attitude towards our forests. We need to extend a hand to those who want to reach a consensus but, if they refuse to come to the table, they need to be excluded from the legal process. "Monkeywrenching" the legal system to obstruct necessary and beneficial projects continues to kill our forests. Until this basic issue is resolved, all this planning and science will be ignored by the activist courts.

Posted by **Fotoware** on March 30, 2010 at 10:53 AM CDT <#>

Regarding recreation, we have already seen a drop in recreational usage and quality from our National Forests. When Let-Burn fires burn for months and old growth turns to brushy snag patches, people stay away from forest recreation in droves. Two years ago, the fires from the Shasta-Trinity NF spread all the way to Yellowstone NP. With bark beetles killing vast wilderness areas, they have become quite unsafe and unpalatable for recreational users. When those dead trees burn, the areas aren't popular and end up being protected snag patches. I do place a large human benefit on forest recreation, as I am retired from the Forest Service and love photography. However, the extremists seem to think that 100 million plus dead trees is not enough. With NREPA on the horizon yet again, we should consider the fact that dead forests are legally-unsuitable as Designated Wilderness and quite ineffective as "wildlife corridors"..... How can we avoid locking away lands that need our help?

Posted by **Fotoware** on March 30, 2010 at 11:26 AM CDT <#>

Does NFMA require that forest plans make any recreation related decisions?

Posted by **Andy Stahl** on March 30, 2010 at 11:47 AM CDT <#>

Should the Forest Plan be more strategic in nature stating broader principles for management and leave the detailed project planning for implementation?

Posted by **Bob Van Aken** on March 30, 2010 at 01:10 PM CDT <#>

Does NFMA require that the forest plan include the planned timber sale program?

Posted by **Andy Stahl** on March 30, 2010 at 01:16 PM CDT <#>

Should revising a forest plan be different from writing a forest plan from scratch?

Posted by **Andy Stahl** on March 30, 2010 at 01:30 PM CDT <#>

With a workforce that is under-educated, under-experienced, with very few quality workforce candidates in the pipeline, how can the Forest Service hope to implement the intense complexity of conflicting rules, laws and policies on to the ground? All too often, the workforce out there on the ground has inadequate knowledge, skills and abilities to implement such new complex project plans. The litigious public will have a field day with lawsuits attacking the quality of the implementation on the ground. In the past, the Forest Service has hired temporary employees off the street to decide which individual trees live or die.

Posted by **Fotoware** on March 30, 2010 at 01:52 PM CDT <#>

For Dr. Cheng: You said that we know how create collaborative processes and the Rule does not need to address that. Is it reasonable for a Rule to lay out the criteria for judging a Forest's planning process so that they can be held accountable?

Posted by **Bruce Meneghin** on March 30, 2010 at 02:10 PM CDT <#>

One thought about collaboration and acceptance of science from outside the Agency is that ANY peer-reviewed studies MUST have peers attaching their names to their reviews. If you are going to peer review a study, OWN the damn review. This is needed to eliminate the possibility of hidden agendas, improve transparency and improve the quality of science included in rules and policies. There is NO benefit to having "blind peer review"! We've already seen a portion of the academic community's bias against active forest management.

Posted by **Fotoware** on March 30, 2010 at 03:02 PM CDT <#>

Will the webcasts be archived? I missed the first hour of today's Forum...

Posted by **LA** on March 30, 2010 at 04:21 PM CDT <#>

This has all been great, by the way. Thank you for all the work that went into the blog and web casts.

Posted by **LA** on March 30, 2010 at 04:23 PM CDT <#>

I'm wondering how panelists were chosen, was there an effort to include alternative views? Will there be in teh future? How about local communities who are impacted by the Forest Service's daily interactions and decisions?

Posted by **Jane DS** on March 30, 2010 at 06:24 PM CDT <#>

We have waited a long time for a forest service road plan; went through a lot of public input; there was discussion and then man Edison invented the light bulb. Well - perhaps it hasn't been that long- but if the forest service is planning something- just how long will the process take ? Will my unborn great grandchildren be able to vote on it? Right now I have no idea what is important to the forest service. If I am right; the plan for the forest service is to pray for forest fires. That is how most make their money !! I am a hunter and I love the forest. It seems though that it has been taken over by ATV's ridden by total nuts. They go around gates; off roads; make trails into areas where motorized vehicles are not supposed to be. Without knowing what the travel plan is; how can we know how other things will be effected. I have an idea - kill all the orchids in the forest. That should be simple. You see there was an attempt to grow Brazil nuts and it failed; because the Orchids that attracted the necessary bug to pollinate the Brazil tree - disappeared. (see Brazils forest service plans). So - I suggest killing all the orchids in the forest; and that way - ATVs would just sit there without their nuts. Really people: complete one task - then complete another. If one plan is never completed; its very hard to tell how the next tasks effects things.

Posted by **Brian Krebs** on March 30, 2010 at 11:37 PM CDT <#>

### **March 9, 2010 How might plans provide for the diversity of species and wildlife habitat?**

One issue that I'm facing on the Angeles National Forest is the stocking of waterways with non-native fish for recreational fishing opportunities. While I recognize the need to provide recreational opportunities on the Forest, when it overlaps with occupied and designated critical habitat for threatened and endangered species, or it is implemented in wilderness areas, frequently it results in a loss of biodiversity. The fish that are being stocked by the California Department of Fish and Game are predatory, and eat tadpoles and smaller, protected fish, having a negative effect on them. This creates even more stress on these populations, and forces the Forest Service to be more restrictive in providing access to these areas in an effort to protect the threatened and endangered species present. It also results in small, isolated populations of amphibians, which are currently being subjected to chytrid (fungal disease), adverse reactions to herbicides, habitat alteration and fragmentation, and climate change. The frustrating thing is that we have no control over where the Department of Fish and Game stock fish. We manage the land, and they manage the wildlife. This disconnect in management creates conflicting interests, and makes our job more difficult. In this situation, it also contributes to the loss of biodiversity. I would like to see the Forest Service institute a rule, which would allow managers to decide what species are introduced onto the Forest. Without this rule, we are currently not in control of the biota of the Forest. The end result is we have to try to react to what other agencies are doing, as opposed to being able to manage both the land, and the animals of the Forest, in the interest of promoting biodiversity.

Posted by **Peter Johnston** on March 11, 2010 at 04:21 PM CST <#>

Allow the Forest Service to reject the Department of Fish and Game from stocking non-native fish on the Forest in areas with TES species or in wilderness areas.

Posted by **Peter Johnston** on March 11, 2010 at 04:58 PM CST <#>

To begin with, the old concept of "species viability" never worked. No one could ever define what it meant, or how you recognized it if you did get it. Eventually species viability was left to the courts to define, and they were never able to define it either. The best way to provide

for wildlife viability is to produce a mosaic of different vegetative species and age classes on the landscape. The species of wildlife that use these various habitats will find and occupy them. We humans do not need to lead them around by the hand (er, wing or paw) to find the animal's habitat. The individuals of each species will find their niche and biological diversity will be preserved. We then only need to find those species that, for whatever reason, are having a hard time adapting to changes in their habitat, and help them. Whether you call them "species of concern" or "habitat-challenged species" is not important. Lets just make sure that in the process of protecting those species with special needs we don't screw things up for a bunch of other species. Jim Gerber St. Anthony, Idaho

Posted by **Jim Gerber** on March 17, 2010 at 03:09 PM CDT <#>

Sadly, the illegal Let-Burn program trumps all other natural resource values, including endangered species. Most of those organisms are on the list due to "habitat loss". Correct me if I'm wrong but, wildfires tend to eliminate endangered species habitat.

Posted by **Fotoware** on March 25, 2010 at 12:01 PM CDT <#>

The NFMA mentions diversity in one clause only: -- Sec. 6.(g)(3)(B) provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order 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; -- That language qualifies and conditions the diversity goal within an overall multiple-use objective, where appropriate, and to the degree practicable. That conditioning effectively dismisses species diversity as a significant goal. Where it is inappropriate and impractical, and conflicts with multiple-use objectives, species diversity should NOT be provided for, as per the letter of the law.

Posted by **Mike Dubrasich** on March 26, 2010 at 10:51 AM CDT <#>

"How can the new planning rule account for variables outside of Agency control, including those impacts that are the results of climate change?" I hope you are not saying that "the science is settled" on "climate change" causing all of this beetle mortality and wildfires. All too many in eco-groups and the mainstream media never mention the other significant factors causing this widespread mortality. Quite simply, there are too many trees for the amount of annual rainfall that falls in our National Forests. Also, the species composition is so very far from "natural", too. The invading lodgepoles are killing off the old growth ponderosa pines. And what grows back is pure lodgepole forests, eliminating endangered species habitats.

Posted by **Fotoware** on March 26, 2010 at 06:16 PM CDT <#>

Here in Bennington County, Vermont, the National Forest is in need of more cutting to promote early successional forest habitat. We have a robust moose population and a rather poor population of early successional forest birds. More cutting would aid the forest products portion of the economy and enhance wildlife, especially, but not exclusively, game animal and bird populations.

Posted by **Solon Rhode** on March 27, 2010 at 05:54 AM CDT <#>

Logging never helps native species, ever, it is an outright lie to say that logging "helps" some species, it always destroys the environment, never helps anyone except logging pockets, and destroys the landscape causing major flood, fire and species degradation problems forever, you cannot replace old growth. ever. Logging destroys the landscape always, forever, increasing temperature extremes and dryness, flooding, fire, species degradation, as well as quality of life destruction for all, stop logging now, the pesticides involved in spraying also degrade our environment and health of all beings. American Forest Resource Council is interested in destroying our forests for their financial benefit, so anything they put forth is a complete fabrication of information for their pockets, not for the environment, always.

Posted by [stuart phillips](#) on March 28, 2010 at 09:30 PM CDT <#>

I'm sorry you are soooooo jaded about forest management, Stuart. Obviously the Sierra Club has gotten its own gfreedy hooks into you. No one is proposing to cut trees and "destroys the landscape". No one is asking the government to clearcut, slash and burn and apply herbicides. In fact, clearcuts have been voluntarily banned in all of California's National Forests since 1993!!!! I've seen the former cotton fields of the South and those pine plantations are pretty impressive now. Destroyed?!? Yes, it WAS. Destroyed forever? NOT EVEN CLOSE! Just so you know, the Forest Service will ignore such slanted rhetoric, bud!

Posted by [Fotoware](#) on March 29, 2010 at 10:03 AM CDT <#>

I attended the US Forest Service Region 5 Roundtable on the National Planning Rule last night, April 6, 2010 in Sacramento, CA. As an ambitious start to involving citizens in developing the new planning rule for the next to 10 to 15 years, I left feeling somewhat underwhelmed since forests in our region have indigenous species that live hundreds and thousands of years. We, the members of the current human population most heavily impacting our forests, need to humble ourselves to the forests themselves if we are to learn how to steward them. We have tremendous tools and technologies at our disposal to help reestablish more than mere "healthy forests". Suffice it to say, that the most learned environmentalists among us would find it virtually impossible to agree what comprises a "healthy forest". Is a healthy forest one which will provide the maximum yield timber harvest? What would a maximum yield timber harvest be? Would it be defined by region rather than ecosystem? How can we be so arrogant to even begin to think that we have the science available to dictate the correct answers to these, or a multitude of other relevant questions? If nothing else, the US Forest Service is asking for the the public input on developing the National Planning Rule. Rather than become a detractor to this process, I would prefer to be involved. My only hope is that Ecosystem Management, as it is developing in the National Planning Rule, will indeed be grounded in what will help restore indigenous ecosystems and micro ecosystems rather than supplant them with some other concoction under the blanket and vaguely defined concept of "healthy forests". The USFS Region 5 Roundtable on National Planning Rule collaborative process may prove to do more than assuage the public into thinking they can affect National Forest policy. Taking the Forest Service at it's word, the public was present and vocal, demonstrating their willingness to do their part. As long as special interests back in Washington do not subvert the process, we may indeed develop a National Planning Rule that will serve the best interest of indigenous biodiversity.

Posted by [Hersiliidae](#) on April 08, 2010 at 12:10 AM CDT <#>

Tribal collaboration and consultation is essential to addressing species and wildlife habitat concerns. A holistic approach to ecosystems care is the most effective and sustainable approach. Single species management is not effective and fails to address the interconnectedness of various species, plants, watersheds, air, etc. Plans cannot compartmentalize the landscape and effectively address biodiversity. Unfortunately the protection of one species often overlooks the interconnection of multiple species and has a detrimental effect to entire ecosystems. Tribal collaboration, consultation and cooperation between the Forest Service and Tribal governments would address the priorities identified by the Forest Service in its December 17, 2009 Notice of Intent to Revise the Planning Rule. Additionally, respect and utilization of traditional knowledge and practices would significantly improve efforts to diversify species and wildlife habitats.

Posted by [slucero](#) on May 11, 2010 at 06:20 PM CDT <#>

### **February 23, 2010: How might the Rule address restoration, climate change, and watershed health?**

Some people simply do not want "restoration". Even if that restoration is to occur in dead and/or dying forests. Some people, including some politicians, simply do not care if the backcountry burns, whether it is wilderness, roadless or regular forest lands. Some people are actively promoting the idea that we don't even need "forestry" in our forests. Sadly, un stewardship of unhealthy forests results in "unnatural" firestorms. We are currently trading old ponderosa pine forests, which harbor endangered species, in exchange for lodgepole monocultures that burn catastrophically about every 100 years.

Posted by [Fotoware](#) on March 09, 2010 at 12:22 PM CST <#>

We should forget about addressing climate change in the planning rule. Humans have no control over climate change. Climate change is controlled by the action of tectonic plates, volcanism, mountain chains, ocean currents, solar radiation, the wobble of the earth's axis, the jet stream, and asundry other factors. Humans are not relavent to any of that. Including climate change will only allow some groups to appeal a forest plan for some alleged oversight for addressing climate change. Do we really need more interference from appeals and litigation? Jim Gerber St. Anthony, Idaho

Posted by [Jim Gerber](#) on March 17, 2010 at 12:36 PM CDT <#>

Collaboration, consultation and cooperation with Tribes is essential to monitoring, mitigating and adapting for climate change. Tribal peoples have long worked with forest plants and animals for cultural, spiritual and other current and traditional practices (gathering, medicinal, spiritual, basket weaving, jewelry, etc.) Tribal peoples have traditional and long standing knowledge regarding plant growth, animal activities, animal and plant health, etc. They can gauge changes in climate and seasons in ways that "science" is unable to quantify. Coordination with tribal peoples would significantly improve the Forest Service's ability to proactively monitor, mitigate and adapt for climate change in a sustainable and effective way.

Posted by [slucero](#) on May 11, 2010 at 06:25 PM CDT <#>

### **February 9, 2010: What might a planning process look like that incorporates the best of what we might call planning science and encourages the same during Land Management Planning**

## efforts for National Forests and National Grasslands?

If you want to get answers to the above questions - you must allow for more space. I just got bounced on the first question because I used more than 1,000 characters. I have a simple answer to all of the above: I used to organize information meetings on proposed regulations. I would paste up the old regulations in the left column and the proposed in alignment with the CFR designations on the right. About a dozen people would meet to go over the words. If it was long - we broke up the groups to tackle one part - come back to report and then come to some agreement or write our proposed changes. I read all the Land Management Plans for the state of California as they were being developed in the 1970's and 80's. The consequences of those plans were very different from what was envisioned. It would be better to have Forest Service people out in the forest and not behind the desk drowning in paperwork.

Posted by **K. Sylvia** on February 12, 2010 at 06:34 PM CST <#>

I have attempted to look at the public comments that would be of most interest to me which were submitted during the comment period, but it is virtually impossible. The web site is badly indexed for that purpose. I first have to select a numerical range, then a particular numbered comment. After looking at that, the site will only return me to the main index and I have to go through the whole thing again. Bad design. It would be best if you posted the source of the comment in the index list. If not that, at least provide "next" and "previous" buttons so a reader could step through the list without having to start from the beginning every time.

Posted by **George Terhune** on March 05, 2010 at 08:38 PM CST <#>

An "all-lands" approach is not one of your better ideas. By law, the agency is not responsible for practices on state, private or other federal agency-managed lands. The FS would be exceeding its authority, and a federal judge would likely find the agency had exceeded its authority, if it tried. In order for this to work there would likely have to be a Memorandum of Understanding between the FS and neighboring land owners that ties everyone to the Forest Plan. No one in their right mind would agree to do that in these hard economic times. Sometimes economic decisions need to be made quickly to take advantage of a certain situation. The FS does not do "quickly" very well. Jim Gerber USFS, Ret

Posted by **Jim Gerber** on March 20, 2010 at 11:54 AM CDT <#>

They have already "annexed" private lands within and adjacent to Forest Service lands in the sense that if fire roars off Federal lands (due to poor or delayed responses) and on to your land, you have no recourse to recover any losses. No wonder timber companies are "trading" their lands for way more money than it is worth, to the US govt! They can also go on to your land and torch it off as a backfire, without your permission. Their "Let-Burn" program continues to illegally destroy forests over vast areas, including being a threat to private property and people's lives. I had hoped that the "all-lands" approach would include highly regulated "treatments" in areas presently blocked.

Posted by **Fotoware** on March 22, 2010 at 02:22 PM CDT <#>

This is a strange place to find a discussion of shared vision (in an all-lands principle). Nevertheless, the planning rule could support the creation of a shared vision by requiring that a Desired Future Condition for the forest be established as a starting in the planning process. Find out what people want the Forest to look like, and be like, in 50 years. This will be an intense public involvement process involving participation by all interested parties, and may be the key to a successful plan. By necessity that will be a very broad vision if all parties are to be included in it, and will not have a lot of specificity. The devil will be in the details after that (which is where alternatives start to appear). Jim Gerber, USFS (Ret)

Posted by [Jim Gerber](#) on March 23, 2010 at 12:30 PM CDT <#>

I would say that standards and guidelines are critical for accomplishing a forest plan. Standards and guidelines are the way a forest achieves its objectives. The objectives determine if the goals for the forest are being met, and the goals are the compass that points the forest toward the Desired Future Condition it is trying to achieve. If you don't have any standards and guidelines there is no way to achieve the objectives, and if you don't meet the objectives there is no way to determine if you are accomplishing the goals, and if you don't know if you are accomplishing the goals you don't know if the DFC for the Forest is being met (except by coincidence; coincidence is not a great way to achieve the DFC). Of course, if you have great standards and guidelines but don't monitor the objectives that are supposed to be met, you still don't know if the goals and DFC are being met. It all works together!

Posted by [Jim Gerber](#) on March 26, 2010 at 05:19 PM CDT <#>

Past Forest Plans have tended to be an long list of ingredients and no recipe. As a result, almost any activity is consistent in most plans and any result is accepted as meeting the unfocused long list of plan goals. Such plans have failed to address the problems that we face. Effective plans have clear measurable goals. The goals identify specific ecological problems that we need to address. I argue that the over-arching goal for forest plans should ensure that as much habitat as is possible be at or near its natural ecological potential. The plan then outlines the specific steps needed to reach this goal and identifies the required resources (e.g. agency funding). The plan should identify conflicting actions (land uses) and provide means to neutralize these. Monitoring is directly tied to measures of the goal.

Posted by [James Catlin](#) on March 31, 2010 at 04:41 PM CDT <#>

January 25, 2010: How should land management planning involve collaboration with the public?
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We need solid, scientifically agreed-upon definitions that cannot be litigated in court. Both tree age and tree size are poor judges of a tree's old growth "value" to the stand. A large pine, loaded with deadly mistletoe, should be able to be harvested to keep it from infecting dozens of other trees. I would also think that a comparison of stocking levels and species composition, as well as tree sizes between pre-European estimates and today's extremely unhealthy and unnatural public forests. Many scientists would like to restore forests back to those pre-European baselines. We are too late for 7 million acres of dead National Forest. We are trading 400 year old, fire-adapted ponderosa pine forests for 80 year old lodgepole forests that burn catastrophically, by "letting nature take its course".

Posted by **Fotoware** on January 25, 2010 at 10:39 PM CST <#>

In my region, National Forest issues attract stakeholders from a large geographic area. The interested parties are both local, meaning residents from communities on the edge of the forest, and regional. To be efficient and transparent, the planning rule needs to combine face-to-face meetings of stakeholders and USFS ID teams, supplemented by Web based forums for continued discussion. Building on the format of collaborative efforts for stewardship projects, the planning rule should encourage a pre-plan advisory group, similar to a pre-NEPA project design group for a stewardship project. Early in the advisory role, the collaborators need to define the structure and format for their planning recommendations, and a calendar or work plan to prepare the recommendations. Regarding Information and Analysis - an effective and efficient process ought to require that the Forest Service planning team clearly communicate the resolution and accuracy of existing information available to support the forest plan. The level of analytical rigor needs to match the data available. Collaborators to the planning process should either 1) understand and accept the data quality as reviewed, or 2) recommend changes to sampling design and additional data collection (that can be supported from available appropriations).

Posted by **DLMurphy** on January 27, 2010 at 05:24 PM CST <#>

I've seen this pattern before, in my decades of USFS experience. They do a bunch of data collection, mapping and analysis and then they formulate ambitious plans to do all the right things you have listed in your rule changes. However, within the confines of the environmental framework of rules, laws and policies, the legal loopholes never get fully addressed. The big group stakeholders are not going to walk away from their profitable endeavors to eliminate timber sales from all Federal Lands. They represent a part of America who confuses preservation with "unstewardship". Confuses "wilderness" with dead and dying forests. Confuses "natural fire" with firestorms..... Yes, the eco's still do NOT trust the Forest Service, even an Obama Forest Service. The eco's preferred response is to do nothing while our forests die, rot and burn.... The 1st order of business should be to see which of the "litigators" is willing to sit down and talk, and who is only going to talk in court.

Posted by **Fotoware** on January 29, 2010 at 02:06 PM CST <#>

Because we manage trees which have life spans in the hundreds of years, we need a planning system that emphasizes a very long term view. For example, when oil truly begins to run out, It will probably become very expensive. At this future time trees we plant now may well become very valuable as things now made of plastic begin to be made of wood. We also need a planning system that emphasizes cross function value accumulation. That is what is the complete benefit of a management activity. For example, timber looks at pruning and finds it's gain for timber doesn't make up for the cost of the project. But if the gain for fire suppression of braking the fuel ladder, and the gain to global warming by the stand not burning down the road and carbon staying in the trees, and the eventual increased value of clear wood as oil runs out, and the value of a labor intensive project like thinning at a time when the country needs higher employment due to recession, the total accumulation of value makes the project very desirable.

Posted by **Charly Price** on February 01, 2010 at 12:39 PM CST <#>

What interesting comments. National Forests are truly "land of many uses" and require inclusion of all the people who have interests in those forests or grasslands. Uses vary - those in Southern California are oriented towards recreation - the forests in the Northwest

are used for harvesting trees. What concerns me most is that nature does not recognize designations of what is national forest, state forest, private land, cities, national park, bureau of land management, etc. Ecosystems are complete working systems - usually constructed around watersheds and land configurations. Animal and plant life tend to live at different elevations and weather patterns - not because it is designated a wilderness, but because this is how they function best. If we are going attempt any comprehensive planning, then we must listen to people who know the land. A map on the wall does not tell the story. Forest Service personnel come and go. District Rangers seem to stay and some even like being in the forest. They are the ones who have the knowledge to understand what the planning process means to the land. Rule #1 How many years have you walked the trails of the forest? I would think a main concern is to emphasize wholistic and systemic stewardship. These lands are our national treasure and ensure some hope against global warming.

Posted by **K. Sylvia** on February 12, 2010 at 06:16 PM CST <#>

Well said to all of the above posters. The comment period ends Feb. 16. I urge you to extend it by 60 to 90 days. This process was launched the week before Christmas and I do not think it received too much publicity. I just found out about it today, and I own a newspaper in the West, close to three national forests and at the edge of the Caribou-Targhee.

Posted by **CalderaGal** on February 13, 2010 at 02:32 PM CST <#>

Is there some way to take lawsuits out of the equation? We need to have collaboration with all stakeholders and have lands available for all uses, wilderness areas and wood production for products.

Posted by **Sam Hopkins** on February 25, 2010 at 11:25 AM CST <#>

Eco-lawyers and groups that seek to end all timber sales want nothing to do with collaboration and consensus. It cuts into their "bottom line". Did you all know that the government doesn't even keep track of how much they pay to eco-groups in legal fees from litigation. Hmmmmm, HOW CONVENIENT, eh?!?!? Also, I am noticing increased effort by radicals to convince America that there aren't any catastrophic fires and that millions of acres of dead and dying forests are, like Martha Stewart always says, "a good thing". However, it's a tough sell to convince Americans that the 200 foot tall flames and burning houses they saw on TV aren't "catastrophic". Again, we need to end the govt's illegal, expensive and destructive "Let-Burn" program.

Posted by **Fotoware** on February 26, 2010 at 12:54 PM CST <#>

Public involvement should be an open, decision-making process. Listen to the public, actually hear what they have to say without preconceived ideas, summarize what you hear, and then come back to the public at each step in the process and say "this is what we heard you say and this is what we are going to do, for these reasons." The worst thing you could do is take public input and then go behind closed doors and come out 6 mo. or a year later and say "We're done. Here's the plan." To which everyone will say "What's this. That's not what we said." The key to public involvement, I believe, is 1) listen closely to what the public says, 2) actually do what they ask you to do, even if the agency does not agree, and 3) do all of that at each step in the EIS Process. Jim Gerber USFS, Ret.

Posted by **Jim Gerber** on March 19, 2010 at 11:57 AM CDT <#>

Forest plans in future need to address sustainable levels of recreation and visitor use management direction to achieve quality landscape settings for outdoor activities. The "all lands approach" needs to include roles for NFS lands to meet local as well as national needs--be responsive to regional and county open space needs and trails systems connections. Landscape restoration goals for meeting climate change ecosystem resiliency need to incorporate human health and outdoor recreation needs as well as place based values for special intrinsic values of forest and grassland landscapes character held by the communities of place around our NFS lands. I applaud the Principles for all lands and collaboration process -- yet we need a principle to also specifically address sustainable conditions for quality spectrum of outdoor recreation activities that meet economic visions for gateway communities and sustainable delivery of recreation on NFS lands.

Posted by **Floyd51** on March 19, 2010 at 03:28 PM CDT <#>

The rule should be composed of three process conditions: 1. Representative regional constituents (public, private, commercial, environmentalist, political, etc) willing to devote significant analysis time to the planning process. 2. A facilitated/mediated "Future Search" process. There are less than a dozen experts on the globe qualified to facilitate a Future Search Conference(s) of such magnitude. I'm confident the Department of Agriculture can find them. 3. Federal & State Courts that will suspend litigation relative to agreements resulting from the Future Search process.

Posted by **Ken Cecil** on March 29, 2010 at 01:20 PM CDT <#>

The New planning Rule should identify tribal collaboration and consultation as a priority.

Posted by **S. Cook** on April 19, 2010 at 06:33 PM CDT <#>

**December 17, 2009: What collaborative techniques do you believe would be successful in developing this new planning rule ?**

This blog is a step in the right direction, as all Americans who love their forests need to listen up, open their minds and get forest restoration going on the right track. That being said, this ambitious change is putting the cart before the horse. Changing a planning rule before changing the conflicting complexity of rules, laws and policies will doom a new rule to endless court battles from an armada of eco-lawyers wanting to "preserve" the controversy. Eco-litigation is a billion dollar per year "extractive industry" that pockets big bucks while the forests suffer. The Forest Service wants to "re-invent the forestry wheel" to radically alter our existing unnatural and unhealthy forests into a more resilient and sustainable set of ecosystems. It IS the right idea but, at the wrong time. The courts simply will NOT allow this, under current restrictions and societal eco-myths.

Posted by **Fotoware** on December 18, 2009 at 11:13 AM CST <#>

I have been involved in a successful decade-long collaboration focused on restoration of the Lakeview Federal Stewardship Unit in Oregon's Fremont-Winema National Forest. The success of the Lakeview collaboration was based in part on an independent scientific assessment, which gave the participants a common understanding of the environmental conditions and needs of the Unit. The collaboration also has had a strong monitoring

emphasis and has supported a monitoring crew team of local high-school graduates for the past seven summers. For the planning rule, I would first recommend that the Forest Service convene an independent committee of scientists to ensure that the rule is grounded in sound science. The work of scientific committee should run concurrently with the 2-year EIS process so as not to delay completion of the planning rule. My second recommendation is that the planning rule emphasize the importance of monitoring and evaluation, especially given the uncertainties about the myriad effects that climate change is expected to have on the forests and watersheds.

Posted by **Mike Anderson** on December 18, 2009 at 11:58 AM CST <#>

I would like to echo the sentiments of the first two posters: 1) this is definitely a step in the right direction (but might be out of sequence); 2) assemble a planning science team ASAP. I have participated in many planning processes at State and federal levels during the past 30 years and typically felt as if my time and comments had been mostly wasted when all the dust settled. The fact that my comments are reaching an intended audience via this blog is very reassuring. The main problem that I have seen with Agency Science teams is that they tend to exclude key disciplines and resource management professionals; particularly those with practical experience. Ironically, the worst offenders usually go under some kind of Departmental Acronymization, such as "ISP," for "Interdisciplinary Science Team," or some such rationale. I would stress the need for the following disciplines being at the core of any planning process: forest historians; fire historians ("historical ecologists"); cultural anthropologists; ethnobotanists; foresters; forest managers; prescribed fire specialists; forest restorationists; and wildfire managers. Too many academics, grad students; GIS techs and inexperienced theorists (the "ologists") have cheapened and devalued past planning efforts, in my opinion. Here is an opportunity to get back on track. I hope it's not wasted.

Posted by **Bob Zybach** on December 18, 2009 at 06:39 PM CST <#>

It's great that the Forest Service wishes to engage the public in the development of a process to rewrite it's forest planning rules. Wow, that's a mouthful and several steps removed from the real prize, which is an agency that is loyal from top-to-bottom to the principles of the greatest good for the the greatest number for the long-term. The Forest Service needs to refocus on providing widely shared public benefits by conserving forests and watersheds for clean water, biodiversity, carbon storage, and quality of life. Please recognize that profit-motivated logging conflicts with virtually all of these objectives. Wood production must be a secondary by-product of sound land management and it must remain subservient to the prime objectives of water, wildlife, and climate stability. Never forget who you work for -- not the timber industry -- not the big donors of the local Congressman -- not the local economic boosters with hair-brained ideas exploit the public trust, but the American people writ large who all share in the benefits of healthy ecosystems, hydrologic systems, and climate systems.

Posted by **Doug fir** on December 18, 2009 at 10:48 PM CST <#>

For collaboration activities to work, people need to know about the complex science at work within the Forest Service. People also need to know about what is currently being done in our National Forests, both good and bad. Most of our country doesn't realize that the Forest Service is letting our forests burn, often at high intensity. Since this rule change is supposed to reflect climate issues, will it address the "Let-Burn" program that sidesteps the NEPA process and destroys forests in the name of "natural ignitions" and catastrophic fuel

reductions. The collaboration HAS to include the people who live in and near our National Forests. It used to be that living adjacent to National Forest lands was wonderful, with lots of nature and lots of wildlife. Now, it's a liability to live next to an extremely dangerous amount of fuels build-ups in an unnatural and unmanaged forest. The idea that more trees (higher tree densities) are good our environment is a fallacy. Thick forests, when they burn (NOT if!) produce up to 300 TONS of toxic GHG's PER ACRE. Currently, our western National Forests are powderkegs of GHG's, waiting to explode.

Posted by **Fotoware** on December 22, 2009 at 10:05 AM CST <#>

Fotoware, I think you are misinformed or uninformed. The Forest Service does not practice a Let Burn policy. You are correct about unhealthy forests creating large and dangerous fires. These unhealthy forests are the result of 100 years of absolute suppression. There is a huge push to return forests to a healthy state and prescribed burning is often the most cost effective and safest way to manage these issues. Everyone agrees that there are millions of acres of overgrown and unhealthy forests. It costs money to accomplish these projects as well as taking a long time to get approval from air quality managers, NEPA, different jurisdictions and the "ologists". Steps are currently being taken to improve conditions, but it takes time and money. And you know how the public feels about their tax dollars.

Posted by **Nick Castro** on December 23, 2009 at 03:11 PM CST <#>

I echo the call for science-based planning. Get the old guns in there who can read the land, hydrology, the fire history, fire-adapted landscapes, carrying capacity and indigenous stewardship. I also echo Gifford Pinchot's creed of greatest good because of its ethic. The NOI recognizes the importance of ecosystem services (greatest good), and this suggests that we are at a point where FS Land cannot continue to be all things to all people (huge elephant). While I think state/local government involvement is important to the Plan, their motives tend to be for immediate economic gain. Hypothetically, it would be worrisome if a water-stricken state's demand for surface water trumped the science that called for water sequestration in meadows as the greater service. Perhaps the "all-lands" approach (NOI Process Principles #2) recognizes the contribution to resource degradation made by local land-use and development. If the plan is to strike a "shared vision" with state, local stakeholders, let it be Gifford's and stand on science.

Posted by **Barbara Balen** on December 24, 2009 at 05:59 PM CST <#>

I am about the most-informed person about the USFS as you will ever find. My first year in the USFS was in '79 and my last year was '09. Some NF's proudly trumpet their lack of a Let-Burn program, with too much private property within or close to their borders. Other more remote Forests have already set aside up to 100K acre parcels for letting ANY natural ignition burn to its heart's content. There ARE many, many examples of these exceeding their "MMA's". The Biscuit Fire burned over 500K acres and the Yellow fire in Idaho was allowed to top 400K acres. The Let-Burn program doesn't follow NEPA, excludes the public, and is extremely costly, both ecologically and economically. The eco's response is that "fires are natural and beneficial" but, that just hasn't panned out, in reality. Yes, prescribed fire will be essential for future restoration but, the Let-Burn program simply destroys our overstocked, unhealthy and unnatural forests, while "preservationists" embrace the carnage.

Posted by **Fotoware** on December 29, 2009 at 10:37 AM CST <#>

As a retired Forest Service employee who was a member of Al Gore's reinventing government effort, this move makes my heart sing. What we are looking at is some times called collaborative governance. The world has changed and this is one giant step into the 21st century. We were 10 years early but I now feel vindicated.

Posted by **Norman M. Macdonald** on December 30, 2009 at 10:29 PM CST <#>

It is very clear that the eco's don't want to even discuss the future of our own forests. Yep, "save the rainforests" but, let our own forests burn. The only consensus we are going to see will be judged in court, using flawed, conflicting and obsolete rules, laws and policies to stop all active management of our National Forests. Until Congress can write laws that make it through the courts, litigation will continue to prevent activities designed to improve forest health and diminish the impacts of climate change and "unstewardship". Until then, we will see wildfires burn with more intensity and human suffering. We CANNOT save our forests by burning them down.

Posted by **Fotoware** on January 05, 2010 at 09:58 AM CST <#>

Planning must be site and project specific. The past planning was so general as to be useless for effecting constructive change out on the Forest. At least that was the case here on the Okanogan. Recent collaborative efforts next door on the Colville, facilitated with Conservation NW, are a small step in the right direction. Examples of planning needs, from the Okanogan, can be found in the last chapter of my book *Ski Trails and Wildlife: Toward Snow Country Restoration*.

Posted by **Eric Burr** on January 06, 2010 at 08:35 AM CST <#>

Very little that will come from these efforts will actually make it out on to the ground. When the big eco-groups see that the Forest Service intends to cut merchantable trees, they will go to the courts and say that this is a "giveaway for the timber industry". With no collaboration on these issues, is the Forest Service ready to go to court?!? Federal attorneys know nothing about natural resources management, and have their hands tied with conflicting rules, laws and policies. "Preservationists" want nothing to do with consensus and collaboration. They prefer gridlock, lawsuits and, above all, the need to "preserve the controversy" instead of saving forests.

Posted by **Fotoware** on January 10, 2010 at 10:40 AM CST <#>

As one of the "ecos" Fotoware seems so afraid of, and so ignorant of, let me say that I applaud this effort at a collaborative development of a new NFMA rule. The NOI was the most thoughtful and thought-provoking scoping document I have ever seen from any agency. Exceptional! If the rest of the process meets the same standards, we will have a final rule that will not just survive the courts (regardless of what side does) but will THRIVE and really set the course for a new century of management for the Forest Service. Yes, I said "management." As an "eco," I want nothing more than sound, science-based management from the USFS. As an "eco," I have signed off on, approved and even been the instigator for more than 300,000 acres of ACTIVE management (read, logging and burning and more) on our National Forests. Real restoration work has been done in many forests and can be done successfully on ALL of them. This is not the time to keep minds closed on any side of the issues. We need to be open and honest and work cooperatively to find a set of regulations that will allow the agency to effectively protect what needs protecting, restore what is damaged or lost, and then maintain all that into the future against the external

impacts of climate change, population growth, and more. All tools need to be available, including silvacultural ones. All people who care need to be involved. All judgments of others and their motivations need to be suspended. All efforts at finding the common ground that is there need to be explored. I have been involved with National Forest management for 27 years. I have never seen a better opportunity to find real solutions to make this agency what it is meant to be, to give these public forests a new century of success. Thanks to the great efforts of the USFS thus far, including the great NOI and this blog. I look forward to making this new rule the one that really works, legally and on the ground.

Posted by **Ray Vaughan** on January 13, 2010 at 10:31 AM CST <#>

As one of the "ecos," let me say that I applaud this effort at a collaborative development of a new NFMA rule. The NOI was the most thoughtful and thought-provoking scoping document I have ever seen from any agency. Exceptional! If the rest of the process meets the same standards, we will have set the course for a new century of management for the Forest Service. Yes, I said "management." As an "eco," I want sound, science-based management from the USFS. As an "eco," I have signed off on, approved and even been the instigator for more than 300,000 acres of ACTIVE management on our National Forests. Real restoration work has been done in many forests and can be done successfully on ALL of them. We need to be open and honest and work cooperatively to find a set of regulations that will enable the agency to protect what needs protecting, restore what is damaged or lost, and then maintain all that into the future against the external impacts of climate change, population growth, and more. Thanks to the great efforts of the USFS thus far, including the great NOI and this blog. I look forward to making this new rule the one that really works, legally and on the ground.

Posted by **Ray Vaughan** on January 13, 2010 at 11:02 AM CST <#>

We also need some way to limit the conversion of unnaturally dense, drought-impacted, and unhealthy forests into designated Wilderness Areas or "wildlife corridors", as planned for the Rocky Mountains right now. Dead forests do not make for a good "wilderness experience" and do not make good "wildlife corridors". Also popular these days are special regional bills designed to trade the potential for commercial forest management in exchange for designated Wilderness. A judge can take away "illegal logging" but, he cannot take away "Designated Wilderness", once it has been installed.

Posted by **Fotoware** on January 15, 2010 at 08:35 PM CST <#>

It is one thing to want "sound, science-based management" but, when the big eco-groups have dedicated all their lawyers and resources to shutdown the Forest Service Timber Sale Program, that removes a huge part of any restoration program. I do applaud your efforts, Ray, as any kind of "active management" is a good thing. The biggest danger to our forests, including climate change, is the trend of modern society to enforce "unstewardship". on an unnatural forest. Before restoration can begin, we need baselines to restore TO! What baseline stocking levels are your projects based on, Ray?

Posted by **Fotoware** on January 21, 2010 at 10:07 AM CST <#>

I certainly do not have the credentials to comment on the science or experiences mentioned above, for either side of the issue. However, as a taxpayer and user of our national forests for a variety of uses, I feel the true initiative of this effort is to find a well balanced program

that addresses the needs of all interested parties without giving headway to any special interest group. That anyone party has achieved prominence over the other is loathsome.

Posted by [George](#) on January 21, 2010 at 04:03 PM CST <#>

While I applaud the existence of this blog, we should ask if it exists only in an "advisory" capacity, or will it have teeth to make the Forest Services actually pay attention to the will of the people who pay taxes so that these forests get "managed" (sometimes not too well). I am concerned by the ecologists, or those who proclaim themselves such but want to reach beyond the limits of their local forest. I feel that any ruling on what to do should start with \*where\* it will be done. I don't think that we should have a set of far reaching general policies, some sort of cookie cutter design applicable to all locales: A policy that works for an eco system with poor, rocky terrain on a large scale will not fit a forest that doesn't have the same hardiness zone, or perhaps a lush valley. The EPA and other Federal agencies are already reaching to curb our freedoms on the land that we own, the minerals that may be under our feet or the water deep under my property. One wonders if before too long we should bother to own anything since the far reaching arm of the federal government thwarts consistently our efforts to better the little plot we have a deed for. Similarly, I'm not too concerned by the "climate change" debate. I know that the change will be relatively slow. Certainly slow enough that the next generation will have time to get out of harm's way and re-calibrate. Not all changes will be catastrophic, or even for the bad: Here, in Wisconsin, I wish I could grow cultivars that grow in zones warmer than mine (a very cold zone 4). If things became dicey in warmer climates, growers would have time, over the span of one generation, to relocate. Change is not always bad. In spite of what I'm saying, I am and ardent treehugger. I'm more interested in reducing waste and pollution in my own home and teaching kids to waste less, recycle more, economize. Reforestation? I'm all for it. Loggers should be allowed to harvest trees that might go to waste. Let's just make sure that the unusable tops get shredded and put back in the land right there, and that after composting, the same entity either replants or pays the Forest Services to replant. A contract should work. Why have such a huge and expensive overhaul, one that is sure to get in the courts, on a national scale??? Work small: Educate the population! give tax incentives to forest owners who manage their forest well. Stay out of the courts: That is the worst waste of our tax dollars.

Posted by [Cécile](#) on January 21, 2010 at 04:50 PM CST <#>

I to applaud this effort, as long as sound science IS what's being used. We now know that base line models do get thrown out when they become an "inconvenient truth" such as the climate change data, and that in fact, Climate Change is NOT a real event, nor caused by man. Al Gore's been busted. The true issue here is how does the forest get managed soundly without excluding one group from another? We now know that over forested lands cannot sustain a healthy forest without adequate amounts of water. Unhealthy trees are homes to bark beetles, i.e.; Arrowhead/Big Bear fires Calif. So, sound harvesting makes good sense. It allows for new growth which eats the carbon you fear for breakfast, (refer to your 5th grade science class), and mitigates against an uncontrollable fire. Human activity is also a problem. Hikers linger longer than off-roaders in particular areas causing more damage, i.e.; trash, rolling boulders, causing landslides, carving up trees to profess their love of the moment, in a 2 mile hike when off-roaders are just passing thru. True hiker's and off-roaders will form coalitions to maintain, clean and restore the environment for which they love and enjoy. True outdoor enthusiasts live by the "Pack it in, Pack it out", "leave it better than you found it" rule. While play riders and sometime hikers will cause most of the damage. Education is key for these knuckleheads. What form of education will be provided?

Posted by **Forever Vigilant** on January 22, 2010 at 09:09 AM CST <#>

It is good to see people standing up and talking about our forests. Rule changes, like these, are designed to make rules that will apply to all forests. We also should be thinking along those lines, as well. Denying that there is no warming is lunacy. Denying that "active management" is essential to saving our forests is equally just as wrong. Yes, education about our forest ecosystems is the key. Foresters continue to be labeled as "tree murderers", and the public gets bombarded with non-issues like clearcutting and old growth. Foresters have the knowledge and experience to apply broad guidelines to specific conditions on the ground. Forests need to be "sculpted" into artistic and functioning ecosystems that support endangered species and other ecosystem services. Everyone needs to read Secretary Vilsack's summer speech about the sad state of our National Forests. Let's hope that his speech and the new rule changes are closely synchronized.

Posted by **Fotoware** on January 22, 2010 at 11:33 AM CST <#>

Anytime the Federal Government wants to change something my taxpaying, owner of federal lands ugly radar fires up. Their spin sounds good but it always ends up in closures, closures, closures with no common sense. I feel they mean well, it is just the folks that shout the loudest get what they want. I agree with the first guy that we need to clean out the unbelievable mess of laws that the ecos love so they can litigate rather than accomplish meaningful laws that truly work. And when I say work I mean making available to all interested parties that use this land. We need to set aside areas for wilderness but not the whole thing for crying out loud. We also need to manage timber harvest, oil exploration for the good of all of us. We live in homes built out of lumber and heat our homes with fuels that come from the ground. We also need land to build wind and solar power. We also need to listen to the local counties through coordination to keep them in jobs and their economies robust. Nobody knows the local environment better than those folks. We must keep open areas for recreation for all including motorized vehicles. So please listen to your own spin and do what is right with common sense as the driving light.

Posted by **Jody Phillips** on January 27, 2010 at 01:34 PM CST <#>

I was going to post a long comment. But it would basically would be a copy of Jody Phillips excellent comments. The only place I would disagree is on the issue of Wilderness. The Wilderness act was passed to set aside a few select truly Wilderness places. It has become a tool for the antis to lock up huge blocks of public land and then have it managed as there private recreation areas. Wilderness is not supposed to be recreation areas. they are to be preserved with very limited use and no conveniences for the visitor. We need to change most Wilderness areas to Recreation areas that are open to all users.

Posted by **Stan Mai** on January 30, 2010 at 05:42 PM CST <#>

Fotoware: stocking was not part of the equation in our southern restoration programs. We have knowledge and existing examples of mostly intact (nothing is totally intact, red wolves and passenger pigeons are gone) forest ecosystems like longleaf pine. The restoration work si to restore the components and processes that should exist in a forest. Each stand will be different in how much it has in terms of trees per acre or bogs or whatever. The goal of restoration is not to recreate a moment in the past but to give the land the things (trees, wildlife, soils, etc.) and processes (hydrology, fire, etc.) it needs to function in as natural and resilient condition as possible moving forward in time. That all requires various levels of active management, depending on each area's needs. Other areas do not need restoration;

they might be appropriate for preservation, recreation, conservation or a combination, depending on the shared values and vision of those who know that landscape. A good planning rule will provide the means for the collaboration that puts in place the restoration where it is needed and comes to agreement (if not consensus) on what happens on the rest. There are places where I want new wilderness designations. There are other places where I can support new motorized trails. But no place can be all things to all people. Good cooperative conservation funds ways to protect and invest in the values all interested people have for a forest, and focusing on everyone's value first, instead of just each person's/interest group's uses and short-term wants, can lead to a situation where most (but never all) of everyone's needs can be met satisfactorily. Thanks.

Posted by **Ray Vaughan** on February 10, 2010 at 10:26 AM CST <#>

Let me address the fear of "the big eco-groups have dedicated all their lawyers and resources to shutdown the Forest Service Timber Sale Program, that removes a huge part of any restoration program." Keep in mind that the largest timber sale in USFS history, the Katrina Salvage project (more than 500,000,000 board feet, more than 40% bigger than the Biscuit sale) was not litigated, appealed or protested in any way. The big eco groups supported it. Why? Collaboration, open and honest communication in its development and implementation, and (mostly) the fact that the project was designed not so much as salvage but as a part of the broader ecosystem restoration goals of the National Forests in Mississippi. Sure, there are a few ideologues out there in the eco groups who want it all stopped, just as there are on the other side who want everything open for logging or mining, but the majority are willing to work together with the USFS and industry to do good projects. Getting to that area of 80% agreement on each forest is what takes a LOT of work, but it is worth it instead of forever yelling at each other over the 20% of stuff we disagree on. Thanks.

Posted by **Ray Vaughan** on February 10, 2010 at 10:34 AM CST <#>

I spent 3 weeks on the De Soto, based out of Wiggins, and I didn't see that level of mortality and harvest at all on their lands. That area took the brunt of Katrina's power, being only 30-50 miles from the Gulf Coast. However, I DID see huge clearcut harvests on private lands that were purported to be excessive compared to the actual damage. Out west, we have eco-groups whose main stated mission is to "eliminate timber sales from Federal lands". They use delaying tactics in order to reduce the value of the dead trees. They even fight to stop the felling of dead trees along roads. No, this isn't a collaboration problem. I do agree that we should get people to the table to talk about stuff. That is always educational for potential litigants. However, I predict that these collaboration sessions will soon turn into yet another delaying tactic, as well as a vehicle to show that they are "trying to talk it out". I suspect that we will continue to see closed-door sessions and drawn-out lawsuits when collaboration doesn't work. I have seen a lot in my 25 year career. My first timber sale (blocked by spotted owls) was supposed to cut trees 48" in diameter. My last timber sale cut trees in the 14" average diameter. I think it is time for me to stand back and watch, to see if this process is going to be a benefit to our National Forests or, if it is going to be a facade for further limiting scientific response to dead and dying forests. There is a huge push out there now to convince Americans that catastrophic fires hardly exist today, and that even if they did, they aren't as harmful as scientists make them out to be. I just don't think that America can be convinced that 200 foot flames are not catastrophic and not damaging to our forests and homes.

Posted by **Fotoware** on February 12, 2010 at 03:34 PM CST <#>

I'd also like to thank to the USFS for opening up this dialog, people obviously have some strong opinions and good ideas. I'd like to reiterate what Ray Vaughan had to say "Sure, there are a few ideologues in the eco groups who want it all stopped and on the other side who want everything open for logging or mining, but the majority are willing to work together with the USFS and industry to do good projects. Getting to that area of 80% agreement takes a LOT of work, but it is worth it instead of forever yelling at each other over the 20% of stuff we disagree on." Forestry doesn't have to equal environmental degradation. Low impact methods are being used in places like Switzerland and New Zealand and are proving very cost effective and good for the forest. Advancements in Cable Yarding equipment have made it possible to perform large treatments with out building roads. These techniques also promote more of a Silviculture style forestry, therefore mitigating fire danger, increasing the overall health and species diversity. By selectively cutting and not disturbing the understory of young trees, the forest can recover on its own without the need for planting after stewardship treatments. If we can provide a better low impact alternative for timber extraction then hopefully the environmental groups can be a part of the solution instead of just being an obstacle in the way to good land management. There has been a lot of good dialog here of how we can bring together the Enviros and the Extraction camps. I hope the FS can be successful in this task because there is a good middle ground here that would be good for our forests and good for sustainable jobs and the resurrection of the timber industry in Colorado and hopefully the US at large. We need a plan that both sides can feel good about then set a course and get out there and get'er done! There's a lot of innovative people and great technologies that can make this a reality all we need is the will and leadership to find solutions and not more stumbling blocks. Thanks

Posted by [Daymon Pascual-www.skylinesolutions.us](http://www.skylinesolutions.us) on February 15, 2010 at 04:41 PM CST <#>

The damage from Katrina on the DeSoto and Bienville covered 450,000 acres. Total down timber was two billion board feet. USFS decided to take one-fourth of that, leave the rest as it did not hinder management (mainly fire use) and science showed it good for the forest. Very little was cleared; the hurricane executed a massive thinning on the forest. Much of it was in stands already planned for thinning and restoration. With an area of nearly half-a-million acres with basal areas ranging from 60 to 140 or even more, you can get 500,000,000 board feet off and not clear anything. This is a forest that can get 8,000 board feet per acre from thinning. Total for Katrina was an average of just over 1,000 per acre. Yes, on private lands nearby, folks took that as an opportunity to slick as much as they could. Anyone who claims USFS management is worse than private industry need only go to South MS to be totally disproved. I know some of the folks who want to shut the agency down completely. Some of them wanted to sue over the MS Katrina project; I would not let them. Not that I have some magical power, but when the agency does things right, with great collaboration and full use of science and full compliance with the law, even the worst ideologues have to look elsewhere for an easier target. I see this new planning rule as a chance to make the great work of the USFS more widespread, much more visible and thus much more defensible ... or even un-attackable to begin with. And I am not the only enviro is who fed up with the trench warfare. Done right, this can cause those who would fight for no reason other than their selfishness to self-marginalize once and for all.

Posted by [Ray Vaughan](#) on February 17, 2010 at 07:15 PM CST <#>

As a retired FS veteran, it is amazing to see the deterioration of the agency and the results on the landscape. Forest health is in shambles. There are more dead trees in the west than live ones, and these will soon burn. Use of a renewable resources are prohibited. The

impacts to watersheds are obvious. The FS is so bound up in NEPA, appeals and litigation, that it is no longer capable of providing proper stewardship of the National Forests. They are good at planning regulations and their continued revision of them, and spending money on fires, but they are no longer good land stewards. Congress, the Dept. of Agriculture, and the agency should be embarrassed. It's not the total fault of the agency as this is what Congress and the multi regulations and the courts have done to them. Congress has created the Gordian Knot and forest health will continue to deteriorated in spite of their new planning regulations. They can't see the Forests due to the regulations and court orders. About the only solution I see is for Congress to act and transfer these watershed lands to the respective States and they in turn be managed by local watershed councils with their traditional multiple use and sustain yield mission.

Posted by **The Rawhide Kid** on March 06, 2010 at 01:57 PM CST <#>

I'm fairly confused. What is the decision space of the new planning rule? I read the 17 questions in the NOI and still couldn't figure out what "degree of freedom" (as the statisticians call "decision space") the agency has in this process. Can anybody help me out? I thought the case law said that forest plans are at the wrong scale for NEPA and that site specific NEPA was always required?? Help!!

Posted by **In the Woods** on March 15, 2010 at 09:05 PM CDT <#>