

February 5, 2010

Forest Service Planning NOI
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These comments on the National Forest System Land Management Planning Rule EIS are submitted on behalf of the 2,000 members of the Jackson Hole Conservation Alliance. Our members reside in each of the 50 states and 5 foreign countries. While not all call Jackson Hole home, they do visit, hunt, fish and recreate on our surrounding 3.4 million acres of Bridger-Teton National Forest and National Forest lands around the remainder of the country. Therefore, they have strong connections and feelings about the sustenance and the process of forest planning. The management plan on the Bridger-Teton is almost 20 years old, and the revision process has been held up by court and administrative actions. The Jackson Hole Conservation Alliance (the Alliance) provides these comments in the hope that a new rule will provide the structure and opportunities to protect and enhance these public lands.

1. Land management plans could address the need for restoration and conservation to enhance the resilience of ecosystems to a variety of threats.

Land management plans that propose to use restoration and conservation to enhance ecosystem resilience should tread this path carefully. While we are faced with many natural threats to our planet, the biggest threat to our ecosystem health is abuse; intentional or not, direct and indirect, by forest visitors. Forest resilience is best achieved by minimal impact by visitors or land managers. A plan should address conservation by protecting existing resources and landscape; management actions should prevent a decrease in numbers or acres by maintaining needed habitat, eliminating invading species; and use a broader, landscape perspective when determining need. To attempt restoration of ecosystems could, and has, backfired. Restoration should be broached carefully and without the idea that our management actions are the solution to a complex and unknown system. Restoration should not be a form of agriculture, replacing depleted resources just to have them harvested again. Our knowledge of these complicated systems is still growing, and we should not presume to be able to insert our methods of solving problems and expect them to be the answer.

Conservation and restoration should be practices that minimally modify our existing landscape for the protection of species. A forest plan should allow the determination of how best to achieve that protection without untoward destruction.

2. Plans could proactively address climate change through monitoring, mitigation and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information.

Climate change will affect our landscapes in ways that we cannot foresee. Resiliency is a result of unimpaired conditions and unconstrained opportunities. To be proactive in addressing climate

change, our landscapes should be healthy and interconnected. This would also provide land managers greater options on how to intervene if necessary to protect species. The other necessary factor is assessment of conditions and careful monitoring of those conditions. All units should have an ongoing assessment of each resource and know if and when optimal conditions have been compromised. Adaptive management, using the knowledge gained from assessing conditions and knowing when those conditions shift, can be a critical tool for a proactive approach to climate change. If we know what is on the ground and what the desired conditions are, plans should be able to take steps to maintain those conditions knowing what impacts are occurring. External factors might be considered as part of the conditions on the ground. Knowing the presence of these uncontrollable factors should bring greater attention to solutions that will be needed to successfully apply adaptive management.

3. Land management plans could emphasize maintenance and restoration of watershed health, and could protect and enhance America's water resources.

Watersheds are discreet, incremental components of the landscape. The scale at which we need to address specific problems can be correlated to the size of the drainage. This will allow actions to occur at a fine or coarse scale depending upon the resource issue being considered. This is a very logical way to approach landscape management and should be used consistently across our nation's forests. As looking at watersheds implies looking at the whole riverine system, any planning or management guidance should look at landscapes holistically. The flora, fauna, geology, climate, land use, and other components should all be considered in determining the health and role of each watershed unit. If portions of watersheds are outside of Agency boundaries, the impacts that could occur on that stretch of river should be included as potential issues for Agency watersheds. It is beyond the legal authority, fiscal and practical reality to assume that the Agency can control those issues beyond their boundaries. Regionally Best Management Practices, if adopted, should be subject to evaluation as to their continued relevance, superiority, and applicability.

4. Plans could provide for the diversity of species and wildlife habitat.

As climate change causes zonal changes within Agency lands, the shift of flora and fauna can only be accommodated to the extent that there are healthy environments providing habitat needs for those coming into the system and those shifting into other geographic regions. An overall approach to healthy habitat is needed in order to provide the desired conditions for any species. For the Agency to plan to make adjustments to maintain existing habitats in the face of external conditions is unrealistic. These shifts in climate, and concurrent shifts in species and habitat within specific areas, may seem large and catastrophic, but we cannot presume to outpace nature. Interconnectivity is probably the best answer for protection of endangered species, allowing a natural expansion and movement of flora and fauna to adjoining, more hospitable lands as climate changes. An assessment of conditions and monitoring of those habitat conditions for all resources within an area would alert managers of the change in the system. This ongoing assessment would be necessary to recognize and adapt to these changing conditions. Not all species can penetrate ecological zones and reestablish themselves elsewhere. Diversity is scale dependent and should not be driven by specific geographic parameters, but considered within the context of habitat needs.

5. Plans could foster sustainable NFS lands and their contribution to vibrant rural economies.

There are many organizations and even agencies whose responsibility is to support and improve the economic state of communities and regions. The Forest Service, alone, is responsible for the management of our national forests. While tasked with including local economies in their efforts, this should not supersede the efforts on maintaining and improving the ecology of the forests. If the ecological systems are not given utmost consideration, the economic system will fail.

Process principles for a new rule:

1. Land management planning could involve effective and pro-active collaboration with the public.

Collaboration should be a standard practice for any Agency proposal. Forest units that are successful in gathering support within the surrounding community are those that have continuing, ongoing relationships with members and organizations within that community. Utilizing a framework similar to the one on this scoping request that actually incorporates the information received and uses it to go to the next level is one that will be rewarded with community support. Maintaining community engagement is dependent upon the community seeing their input used to continue the process. A planning process shouldn't be an isolated attempt to gain information and support from the communities, but should be part of the interaction between the Forest Service and the public. A variety of information and methods to encourage participation would be more likely to catch additional interest and concern. Not every individual relates to a specific bit of information or to a particular methodology as his neighbor might; the broader the range of choices, the greater the chance of connecting with that individual. The quicker that each iteration of a plan could be taken back to the public, the better chance of keeping those people engaged. Since there is no lack of room for bad decisions to be made after receiving public input, we would advocate for a post-decision appeal process. Having an appeal process in place is necessary to ensure consistent and well-thought out plans.

2. Plans could incorporate an "all-lands" approach by considering the relationship between NFS lands and neighboring lands.

While all lands surrounding forest units might not be willing to modify their actions, they should be included in any planning process, and the information garnered through the process should be shared with others. A comprehensive analysis of desired conditions on forest lands and the impacts that threaten them from within or without should be recognized across landscapes, but the Forest Service is not beholden to translate their efforts to other land owners. The new planning rule could encourage the creation of a shared vision of the planning area. All nearby or adjoining federal lands should be part of any planning process.

3. Plans could be based on the latest planning science and principles to achieve the best decisions possible.

This third principle of process is integral to fulfilling the second principle and vice versa. Having an effective, inclusive planning process can be adapted to any geographic region. Having consistency among the forest units would be beneficial. A single process does not presuppose a range of appropriate plans for individual units or their communities. A strategic plan that identifies the acceptable and unacceptable state of conditions on the forest does not have to go into detail for specific projects, but the plan should be clear on what those desired conditions are and how much or little impact on them would be acceptable. Separate NEPA reviews should be expected for individual projects. The foundation of the planning process should inform the review to a great degree with attention needed for finer scale or more detailed information. A sufficient forest plan could identify actions that would trigger the level of NEPA expected to maintain those conditions. This factor and the inclusion of standards and guidelines that are integrated with the plan would allay many fears and prevent bad decisions. The environmental effects of a planning rule would seemingly be obvious from the degree of public participation required, the relevance of standards and guidelines, the flexibility of forest units to determine proposed actions, the appropriate level of review, and the process defined for the scale of the projects being considered. The less these factors are being incorporated, the greater potential for negative environmental impacts. The most critical factor in developing a forest management plan is the use of science above politics. The resources should not be managed based upon political desires, but upon clear, best-available science.

We look forward to the release of a draft EIS and further opportunity to help develop this tool for forest management.

Sincerely,

Louise Lasley
Public Lands Director