

Submitted electronically May 16, 2011

Forest Service Planning Rule Draft EIS
C/O Bear West Company
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These comments on the National Forest System Land Management Planning Rule draft EIS are submitted on behalf of the 2,000 members of the Jackson Hole Conservation Alliance. Many of our members spend time on our national forests and much of the Alliance's efforts toward protecting our wildlife and habitat is on those forests. We understand the importance that planning can have in ensuring lands are well managed and that this provides the highest benefit to wildlife, habitat, and public use.

The breadth and depth of uses and concerns on our national forests require that equally broad and in-depth environmental studies be done at the planning level and the project level. This approach will make sure that our public lands can be sustained for future use.

The draft EIS advocates an assess/plan/monitor format for forest planning. While this formula appears to adequately cover the necessary aspects of a plan, the details fail to address the strong regulatory measures needed to protect forest lands. This approach should not be viewed as a stand-alone process, but should be incorporated into the culture of the forest system and inform the day-to-day programs and actions that are taken. A good plan will use the monitoring process to assess the need for amendments and other changes. This should be a continuous feedback loop. At all stages, cumulative impacts and minimum standards for systems should be fundamental to determining how the forest is functioning and if changes need to be made. There seems to be an obvious weakness in requirements that will protect wildlife and habitat. The proposed planning rule gives too much discretionary authority to the lead official without any way to hold that person accountable for producing an effective, science-based plan. The lead official will not need to adapt a management plan if no one has been paying attention to conditions on the forest. There should be stronger requirements for protection that will prevent the further deterioration of the landscape.

The current situation on our public forests would suggest that more, not less, care needs to be given to protection of species and habitat. To maintain biodiversity will require greater documentation of conditions and a monitoring plan that actually states actions to be taken if needed. Monitoring should result in specific responses to observed conditions. Best-available science should not just be taken into account, but applied to the issues being studied, and monitored for their effectiveness.

One thing that should be evident from a forest plan is what areas are appropriate for which activities. Suitability should be an integral part of a plan. This eliminates uncertainty and provides forest users with a comprehensive idea of how that forest will be managed.

A process of feedback during the planning process is essential in the development of a good plan. But the pre-decision system you have outlined in this EIS does not provide the opportunity to challenge a poorly designed plan. Neither the time frame for objecting, nor the process for objecting, can ensure that a plan will stand up to legal or public scrutiny. The planning rule should allow for post-decision appeal in order that plans will be sound and acceptable.

Sincerely,

Louise Lasley, Public Lands Director
Jackson Hole Conservation Alliance