

Forest Service Planning NOI  
Planning Rule EIS  
February 15, 2010

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c/o Bear West Company

172 East 500 South

Bountiful, UT 84010

RE: NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT

Dear Planning Team:

The Montana Department of Natural Resources and Conservation (DNRC), Forestry Division offers comment on the above referenced federal action. In Montana, 65% of timberland is owned by government agencies, most notably the U.S. Forest Service (Agency). Approximately one third of these federal forests have been designated as being suitable for proactive forest management. The viability of our forest products industry, rural communities, private forest landowners, and the state's ability to implement sustainable forest management on trust lands is directly affected by federal land management policies and directives.

The Multiple-Use Sustained Yield Act of 1960 (MSYA), the Federal Land Policy and Management Act of 1976 (FLPMA), and the National Forest Management Act of 1976 (NFMA) all mandate National Forests sustain, in perpetuity, the productivity of the land and the multiple uses of its renewable resources. Maintaining or restoring the health of the land enables the National Forest System to provide a sustainable flow of goods, values, benefits, recreation opportunities and ecosystem services.

While developing a new planning rule allows the Agency to integrate recent new highlights such as forest restoration, watershed protection, forest ecosystem adaptation and an "all lands" concept, the Agency must not lose sight of the need to fulfill congressional mandates.

The Agency's proposed substantive principles to 1) incorporate restoration and conservation to enhance the resilience of ecosystems; 2) address climate change through monitoring, mitigation and adaptation; 3) emphasize maintenance and restoration of watershed health; and 4) provide for diversity of species and wildlife habitat must acknowledge principles of restoration, watershed protection and forest adaptation as a subset of sustainability and diversity, assisting traditional principles of ecosystem resilience, biodiversity and economic viability.

The Agency presently employs restoration principles for composition, structure, pattern, and resiliency to attain desired future conditions as outlined in the Forest Service Manual (FSM). Monitoring and adaptive management were key to the 2008 Planning Rule and should continue to be critical to any resource objective scenario. Achieving a desired future condition is not possible without monitoring and adapting to changing forest condition. Climate change adaptation and mitigation strategies should be developed across jurisdictions, with adequate federal funding for state and private programs.

Beyond institutionalizing restoration, monitoring, climate change, and species diversity into a new planning rule, the Agency must develop directives to improve "process". The agency proposes to 1)

involve the public in effective and pro-active collaboration; 2) incorporate an “all-lands” approach by considering the relationship of multiple jurisdictions; and 3) base land management plans on the latest science to achieve the best decisions possible.

Many regions are engaging in community or stakeholder collaborative processes in hopes of resolving divergent ideologies, ultimately leading to project implementation. Collaborative conservation emphasizes the importance of local participation, sustaining natural and human communities, and voluntary consent and compliance rather than enforcement by legal and regulatory means.

Collaborative efforts have been welcomed by Agency resource managers; however, collaboration has frequently proven to slow down Agency planning and implementation and prolong the process. Collaboration is meant to empower the public through ownership of an end product that effectively implements forest improvement efforts, addresses critical forest restoration needs, provides forest products, and employment for our citizens. An extensive process that results in the Agency adopting an alternative not recommended by the collaborative effort will have an adverse and reverse effect.

Stakeholder collaborative efforts have been around long enough now for the Agency to learn from and build on successes, while working to resolve barriers. The next generation of collaboration must resolve issues such as:

- Collaborative recommendations that have legal and procedural standing
- A compressed environmental analysis timeline
- Adequate funding to implement recommendations

In addition to providing the necessary tools for success, the Agency must employ an integrated approach to resource response strategies. The 2008 Farm Bill directed each state to complete an assessment of forest resource risks and needs. Completed state assessments are the blueprint for prioritizing projects and funding across all ownerships and should be the basis for an “all lands” watershed approach to ensuring ecosystem biodiversity and resiliency.

The DNRC advocates for the new planning rule to retain an outcome-based approach, while focusing on desired future conditions and monitoring to support adaptive management and measurable objectives. We believe that far too much time, effort, and financial resources have been invested in forest plan preparation and revision, at the expense of managing for the tremendous environmental, economic, and social benefits our nation’s forests have to offer. Consequently, the DNRC intends to engage with a coalition of leaders and land managers to develop a draft forest planning process proposal as part of the next phase in the public process. We look forward to continuing to work on this very important planning effort.

Sincerely,



ROBERT A. HARRINGTON

MONTANA STATE FORESTER