

February 12, 2010

The California Department of Forestry and Fire Protection (CAL FIRE)
Comments on Development of United States Department of Agriculture (USDA)
Forest Service Planning Rule and Environmental Impact Statement.

Introduction

The forests and rangelands of California (exclusive of urban forests) cover over 80 percent of the State. They provide wide-ranging and critical goods and services, such as biological diversity, open space, scenic vistas, wildlife and fish habitat, recreation, timber, forage, water, and renewable energy. The USDA Forest Service is the single largest land administrator in California and manages 18 National Forests and one grassland comprising over 20.4 million acres. As such, the U.S. Forest Service plays many important roles in California including land manager, researcher, provider of fire protection, and private landowner assistance. Consequently, National Forest planning, budgeting for fire protection, biomass supply, state and private forestry redesign, and policy directions of the new federal administration are important resource management issues for California.

By State law (Public Resource Code 4789) CAL FIRE must periodically assess California's forest and rangeland resources. The results of that assessment are used by the State Board of Forestry and Fire Protection to develop and update a forest policy statement for California. Recently, the 2008 Federal Farm Bill amended the Cooperative Forestry Assistance Act to provide for greater reliance on state forest resource assessments and resource strategies. This policy change is reflected in the USDA Forest Service State and Private Forestry Redesign Program. The goals are, within states, to identify priority forest landscape areas and to underscore work needed to address national, regional and state forest management priorities.

The principal analyses and findings of the Forest and Rangeland Assessment as well as the concept of priority forest landscapes within the USDA Forest Service Redesign Program provide a basis for CAL FIRE's comments and recommendations regarding the new planning rule and associated EIS development.

Comment: The current rule treats the State of California and similar entities as no different than any other public member, individual or group. The State of California, other states, and other public entities have a different presence than the general public in decisions made about national forest land planning and use, especially where lands either directly connect to or are part of a watershed containing local and state-owned lands. Consequently, the notice process and the planning process must provide greater input to the State of California and

other affected entities throughout the planning process due to state public safety and natural resource protection legal mandates.

There is no mention in the NOI principles of any consideration or consistency with either the Farm Bill Redesign process or other elements of the US Forest Service national assessment process. It seems like there should be direct connection between other assessment efforts in the USDA Forest Service or done by the states under the Farm Bill Redesign process. Otherwise, how are multiple planning and state assessment efforts to be connected?

Principles Identified in the Notice of Intent and Cal Fire Comments

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

Comment

Forests and rangelands within California are subject to a variety of threats. It is increasingly important that in the face of those threats, lands are identified where restoration and other focused management actions will increase ecosystem resilience and the sustainability of desired goods and services. Individual land management plans are uniquely suited to identify these lands.

Specific Question(s) posed in the NOI

How do you define restoration?

The Society for Ecological Restoration defines ecological restoration as an “intentional activity that initiates or accelerates the recovery of an ecosystem with respect to its health, integrity and sustainability” (SER 2004). Restoration includes a wide scope of initiatives including: erosion control, reforestation, removal of non-native species and weeds, revegetation of disturbed areas, reintroduction of native species, as well as habitat and range improvement for targeted species.

What is your concept of restoration?

To create or maintain a condition of ecosystem resilience to better withstand natural disturbance and provide desired goods and services. Restoration denotes a management activity that will return forest and rangeland ecosystems to a level of resilience where they are more capable of resisting change to ecosystem processes or enhancement of rate of recovery. We also recognize that questions exist in the areas of (1) Severity of impacts from past land use (2) Habitat fragmentation (3) The existence of checkerboard land ownership pattern.

How can the planning rule foster restoration of NFS lands?

The planning rule can set broad performance standards and provide a process or guidelines to determine if performance standards are achieved. A planning rule should not be inflexible or be written in a form that invites continuing litigation. It should be clear that rules must be written in a way that does not encourage or promote continuous litigation or other social roadblocks.

What do you see as the biggest threats to forest and grassland health and ecosystem resiliency?

Forest Pests

Prioritizing areas for restoration after major forest pest outbreaks is critical if California is to use scarce resources effectively, given the myriad of forest pests and the large number of host species impacted.

Areas at significant risk of future forest pest outbreaks are:

- Areas with high expected forest pest related tree mortality;
- Ecosystems with a high proportion of areas at risk from forest pests (High landscape-level threat) and;
- The undamaged portion of heavily damaged ecosystems.

More specifically, the 2010 Forest Assessment for California done under the Farm Bill, finds Forest Pests cause widespread resource impacts throughout California's ecosystems. Over 1.9 million acres are delineated as High Priority Landscape; 76 % are on National Forests. Ecosystems currently suffering the most extensive damage are Sierran Mixed Conifer, Eastside Pine, Red Fir and White Fir.

Invasive Species

Invasive, non-native plants damage California ecosystems by changing plant community composition and structure and reducing the value of forests and rangelands for wildlife and livestock.

Invasive plants frequently disrupt ecosystem processes such as fire regimes, sedimentation, erosion, light availability, hydrology and nutrient cycling. Some alter soil chemistry, pollute gene pools, suppress native species recruitment and harbor exotic animals. The impact is especially severe in California, with its rich diversity of natural resources. The threat posed by invasive species is second

only to habitat loss and is long lasting, difficult to remediate and occurs throughout the state.

Wildfire

The USDA Forest Service administers about 20% of California with substantial portions in a 'checkerboard' pattern of alternating public and private land ownership. In areas where these ownership patterns predominate, interagency wildfire planning and cooperative fire agreements are a logical approach.

Data suggests a trend of increasing acres burned statewide, with particular increases in conifer vegetation types. This is supported in part by the fact that the three largest fire years in the period since 1950 have all occurred this decade. In addition, wildfire related impacts are likely to increase in the future, based on trends in increased investment in fire protection, increased fire severity, fire costs and losses, and research indicating the influence of climate change on wildfire activity.

More specifically, the Forest Assessment for California being done under the 2010 Farm Bill finds that for wildfire threats to ecosystems there are 18.5 million High Priority Landscape (HPL) acres; 64% of this is in federal ownership, mostly USFS. The most at risk ecosystems are Klamath and Sierra Mixed Conifer and Douglas-fir in the Klamath/North Coast, Modoc and Sierra bioregions; Shrub types: Sagebrush and Coastal Scrub.

General -

A variety of other threats is recognized and need to be addressed. These include: 1) climate change, 2) air pollution, and 3) development/land use conversion. Development (only one aspect of land use conversion) is more of an issue at fringe and in-holdings. Land use conversion is an issue from loss of productivity due to wildfire, mining, lack of revegetation, site conversion following harvesting, and other factors.

While not traditionally characterized as a threat, lack of any management on USFS acres is itself a real risk. This risk is increased as a loss of harvesting and management infrastructure (like mills), in part because of USFS policies, occurs.

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

Comment

Our collective ability to mitigate and adapt to a changing climate and the consequent change in relative importance of various forest threats is dependent on monitoring and the ability to assimilate new information into forest land management planning guidance. Individual Forest Land Management Plans should evaluate likely climate change scenarios and potential management response.

To preserve and enhance forest carbon management it is necessary to consider both actions that increase carbon sequestration where possible, and actions that reduce losses from wildfire, land use conversion, and other forms of disturbance. The USDA Forest Service can contribute to biomass energy policy in California through research on technologies and sustainability and by providing reliable long-term supplies from national forests.

The overall framing of this question in the federal register is good, but the inherent risk is that requirements will be made part of a planning rule and will lead to indecision and/or an increase in litigation. The basic approach of adaptive management as used by USDA Forest Service seems sound, though it also may be too slow in providing answers.

Specific Question(s) posed in the NOI

How can the planning rule be proactive and innovative in addressing the need for climate change adaptation and mitigation?

The points below are findings in the update being prepared for the 2010 Fire and Resource Assessment of California's forest and rangeland resources.

Consideration of climate change in rules and plans is a new field ripe for endless rulemaking, audit, delay and lawsuits.

- Management will need to restore ecosystem resiliency, and also factor adaptation and mitigation strategies into planning and project development.
- Plans will need to be innovative, integrate climate change and watershed management, and use climate change as a theme under which to integrate and streamline existing national and regional strategies for ecological restoration, fire and fuels, forest health, biomass utilization, and others.

- Plans could also include clear monitoring programs and incorporate evolving research in order to develop science-based understanding around climate change impacts and adaptation and mitigation efforts.
- Plans will need to anticipate climate change-related uncertainty and be adaptive to new science and knowledge about changing conditions on the ground.
- Responsible officials will also need flexibility to be able to adjust plan objectives and requirements where there are circumstances outside of agency control

What kinds of data, research, and monitoring could assist land management planners to incorporate climate change adaptation considerations into plans?

Planning should include short and long term strategies, monitoring for unanticipated climate effects, effectiveness of adaptation strategies, and ensure flexibility to manage adaptively and make adjustments to goals and objectives as we go. Specific areas of research that we have identified include:

- a. Urban Forests and Climate Change: Comprehensive Cost and Benefit Analysis
- b. Predictive Tree Biomass Model Evaluation and Improvement for use in decreasing the uncertainty within the results provided by the USDA Forest Service Inventory Assessment program.
- c. Wildfire GHG Emission Analysis: Standardized Estimation Methodologies
- d. Life-Cycle Characterization of Forest Carbon Pools and Wood Products in California
- e. Forest Landowner Profile Development: Current and Projected Forest Conditions and Landowner Participation in Programs and Markets
- f. Improved Forest Research and Management Tools: Climate Smart Forest Projections and Risk Assessments for Pests and Fire
- g. Forest Bioenergy GHG Profile Characterization
- h. Climate Change and Forests Research and Monitoring Infrastructure Development: Joint Strategic Planning
- i. Quantification of managed fire versus wild fire GHG emissions in California forests.
- j. Risk and prevention analysis of catastrophic tree mortality in California forests from exotic insects and disease.
- k. A comprehensive monitoring and adaptive management program to quantify the effects on climate change and the effectiveness of adaptation strategies.

- I. Improved analysis of timberland conversion (forest degradation) trends and effects.
- m. Promote research on carbon cycling benefits and rangeland management climate benefits.

How should the planning rule address uncertainty?

Adaptation to climate change impacts will require making decisions with limited information and with uncertain outcomes. This underscores the need to make long term investments in monitoring and research, and to develop a robust set of management options.

- Both private and public forestlands appear to continue to build inventory volume.
- A USDA Forest Service analysis (Goines and Nechodom, 2009) indicates that while carbon sequestration is occurring, long-term carbon storage will be a function of management inputs over the next 100 years.
- A carbon sequestration and storage analysis of California's private forestlands suggests that like USDA Forest Service lands, the potential exists to sequester and store more carbon, but expected benefits will also depend on management.

Although climate model results differ, there are likely to be significant changes in the composition of forests throughout the state under all scenarios and models. In some cases, environmental effects from climate change have already been observed in California forest and rangelands. These include shifts in species ranges, changes in the frequency of disturbance from wildfires and pests and effects on forest productivity.

How do other public and private entities recognize and incorporate uncertainty in their planning efforts?

The statewide Climate Adaptation Strategy prepared by the Natural Resources Agency provides useful examples related to forest and rangeland activity needs (including cross sector issues).

The Fire Plan is being revised and will in part address climate impacts. Defensible space has been extended to 100 feet around structures as a risk reduction measure. CAL FIRE has revamped the Fire Hazard Severity Zone model and made recommendations in over 200 cities and all of State Responsibility Area. Due to the increased development in California wildlands, building standards have been passed that address ember spread and the need for more fire resistant construction materials and designs. Also, fire codes have been amended to require sprinklers on roofs to minimize ignition.

How can a new planning rule appropriately build in the flexibility land managers will need to adapt to changing science, information or conditions?

Again, the rule needs to provide flexibility using broad performance standards while providing guidance within the process to determine when the objectives of the performance standard are met.

What mechanisms should be used to incorporate new data?

Information can be used to help improve estimates of communities that are sensitive to climate change impacts. Some examples include:

- Models for movement of vegetation and wildlife species
- Determination of wildfire hazard and/or risk to ecosystem and communities
- Impacts of high density, short duration storms resulting in runoff and increase erosion that will have negative impacts to water supplies.
- Urban areas subject to greater heat island impacts, and resulting increase energy demands.

Based on analysis of this type of factor, scarce funds and resources can be more effectively allocated.

Do you know of any successful adaptive management regimes that can inform our process?

Forests that are managed sustainably can help mitigate or offset the emissions of CO₂ and other greenhouse gases. CAL FIRE has identified five strategies to mitigate against Green House Gas (GHG) emissions: reforestation, forestland conservation, fuels reduction, urban forestry and forest management to improve carbon sequestration. With the increasing certainty found in recent climate change reports it appears that even with reductions in GHG emissions, some level of climate change is likely and that adaptation strategies will be needed to maintain productive forest and rangelands.

Fuel hazard reduction treatments have demonstrated compatibility with the existing seral stages in the landscape. The most current example is the efforts by the Quincy Library Group in Plumas County.

How should plans anticipate and address changing conditions or impacts outside of agency control?

Planning should consider effects of an action on federal lands to adjoining private or other public lands. Planning efforts need to consider the landscape or watershed level effects of management actions, regardless of political boundaries or ownership lines. Collaboration with the adjoining jurisdictions or

ownership will assist in development of resilient forest and rangeland ecosystems.

Participation with community, county, regional, firesafe council, and watershed group level with staff support and information are critical is one example. The USDA Forest Service has a number of other examples in working with communities to analyze and plan for wildfire impacts. California has a strong mutual aid system of wildfire planning and fire suppression. The USDA Forest Service plays a key role in this. Use this as a model of cooperation and collaboration with agencies. Collaboration is hard work but pays off. Planning rule should encourage existing efforts and build off of them. This particularly true for topics such as fire protection agreements, community fire-planning efforts.

How can external factors be incorporated or recognized in plan guidance and requirements?

Appropriate process designs can be incorporated to strongly encourage collaboration with other entities contained in the planning assessment area. We can comment more specifically when a draft planning rule is provided for review and comment. As a state agency we would appreciate the opportunity to work with the authors of the proposed planning rule to assure California's interests are addressed.

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

Comment

The quantity and quality of water produced from forested watersheds in California is paramount among the ecosystem goods and services derived from these lands. Forest Land Management Plans should identify on a watershed scale opportunities for the protection and restoration of watershed health. In California the 2010 Forest Assessment under the Farm Bill identified that there are 17.5 million acres considered as High Priority Landscapes for water supply; 50% of the lands are owned by USDA Forest Service. The upper watersheds in the Sierra and Cascades have the greatest concentration of high priority landscape. In a separate analysis done on water quality factors, USDA Forest Service lands were also significant.

Specific Question(s) posed in the NOI

Should a new planning rule include standards to address watershed health? If so, what might those look like?

We are willing to collaborate with the individual National Forests as they respond to the new planning rule. The standards will differ across California due to the diversity of the states weather patterns, vegetation cover, soils, and geologic structure.

Water supply and water quality are separate but interrelated issues. For water supply, plans at the very least should address amount and timing of water yield and encourage management that will maintain or improve this yield. For water quality, plans should at least address impacts of both historic and current land uses. Results need to be consistent with federal and state laws that regulate water quality. Other factors such as watershed improvement, restoration following wildfire, fuel hazard reduction, riparian and meadow habitat, and recreational uses are relevant and should be addressed in plans as appropriate.

Should the Agency be held accountable only for actions and problems on its NFS lands or take into account water availability and quality factors that are outside of the Agency's control?

We encourage cross ownership and cross jurisdiction planning.

What planning or management guidance could the Agency incorporate in the rule to protect and enhance water resources?

Forested watersheds across California provide clean water that supports a broad range of beneficial uses. Nearly 85 percent of California's average annual runoff is produced from forested watersheds. Forests and forestry practices can help protect, restore, and sustain water quality and quantity, and watershed health. Land management plans should identify watersheds where continued forest conservation and management is important to the future quantity, quality and timing of water supply.

- The major watersheds across California differ distinctly in climate, geology, ecosystem process, and land use. Flexible water management tools and policies are needed to account for this tremendous variation.
- Protecting and managing forests in source watersheds is essential to future strategies for providing sustainable supplies of clean water for a broad range of beneficial uses.
- The public is generally unaware of the role forests play in protecting critical water supply assets and of the existing threats to water supplies in headwater regions.

What planning or management guidance could the Agency incorporate in the rule to protect and enhance water resources?

No comment.

One way to approach planning for an NFS unit is to think about the future of the planning area through the context of its watersheds. Do you see benefits and/or drawbacks to a rule requiring land management planning on a watershed basis?

We support an “all lands” approach to planning. We believe this better addresses the real natural resource issues affecting management of priority landscapes and the associated risks within those landscapes.

Do you see benefits or drawbacks to a rule requiring adherence to regionally specific Best Management Practices?

No comment.

Substantive NOI Principle #4 Plans could provide for the diversity of species and wildlife habitat.

Comment

Forest Land Management Plans should contribute to the maintenance or restoration of desired levels of species diversity and wildlife habitat as a product of sustainable ecological processes. Because ecological systems are dynamic and variable, resource assessment, the monitoring and study of wildlife populations, habitats, and ecosystems, is a fundamental requirement for effective conservation, restoration, and management and should be a prominent element of individual forest land management plans.

Specific Question(s) posed in the NOI

How should the new rule provide for diversity?

While a number of state agencies have programs affecting species and habitat, the California Department of Fish and Game (CDFG) is the lead agency responsible for managing the state’s wildlife, plant and fish resources.

Recent and/or ongoing efforts by CDFG related to habitat threats and protection include: California’s Wildlife Action Plan (CWAP), Areas of Conservation Emphasis (ACE), and the California Essential Habitat Connectivity Project.

The CWAP summarizes threats affecting all wildlife, including mammals, fish, birds, reptiles, amphibians and plants, and suggest actions needed to maintain habitats and diversity in the future.

CDFG will soon complete a report called Areas of Conservation Emphasis (ACE). The purpose of the ACE is to identify high priority areas for conservation based on biodiversity and endemism, threats to the former, and key critical areas of habitat and habitat types. The study should provide a comprehensive analysis

of wildlife habitat assets and threats, with a focus on lands that are not currently managed for wildlife conservation.

The California Essential Habitat Connectivity Project (CEHC) is a CDFG and California Department of Transportation (CALTRAN's) sponsored, public/ private project to meet legal obligations to map wildlife corridors and habitat linkages. The goal is to produce a matrix summarizing the biological values of the linkages, a strategic plan that frames a methodology for finer-scale analysis and local/ regional connectivity plans and a habitat connectivity map.

How should the planning rule guide protection of at-risk species of animals and plants and their habitat?

Conserving habitat for native species and the productivity of ecological systems are useful metrics to assess ecological sustainability. Protection, conservation, and restoration of forest and rangeland wildlife habitat are critical to maintaining and enhancing biodiversity. California is a biological hotspot of plant, animal and ecosystem diversity. The highest number of species in the United States and the greatest number of species that occur nowhere else in the world are found in California. Climate, geology and ecological processes (fire regime, rainfall, topography, nutrient cycles, etc) all combine to create and maintain the many habitats and high biodiversity found in the state. The California Wildlife Action Plan, developed in response to the State Wildlife Grants Program enacted by Congress in 2000, presents at least 20 different threats to plant, wildlife and fish populations and their habitats. Four occur statewide: growth and development, water management conflicts, invasive species, and climate change. Five others occur in multiple regions: pollution and urban/agricultural runoff, excessive livestock grazing, altered fire regimes (due to fire suppression and wildland-urban interface expansion), recreational pressure/ human disturbance, and other land management conflicts.

How can the new planning rule account for variables outside of Agency control, including those impacts that are the result of climate change?

As stated earlier, we suggest a collaborative approach with all involved in the planning assessment area, or an “all lands” approach to planning. This should begin early in your process such that pre-determined outcomes are avoided.

Should species diversity provisions in planning look beyond the individual unit to a watershed or landscape scale, and if so, what is a practical and workable way to incorporate a broader perspective?

We would be willing to collaborate with the individual forests as this new planning process develops. The standards will differ across California due to the diversity of the states weather patterns, vegetation cover, soils, and geologic structure.

How could wildlife habitat monitoring be addressed in a planning rule?

Refer to the first comment responded to in this section.

Substantive NOI Principle #5 Plans could foster sustainable NFS lands and their contribution to vibrant rural economies.

Comment

Forest Land Management Plans should promote the social and economic elements of sustainability and in particular, their contribution to local rural economies. National forests and grasslands provide many of the resources and values upon which local communities maintain and define themselves. As such, the Forest Service land management planning process is well placed to assist local communities in their definition of sustainable social and economic systems.

Specific Question(s) posed in the NOI

How can the planning rule reflect the interdependency of social, economic, and ecological systems in a way that supports sustainable management of national forests and grasslands?

Refer to response to the last question in this section.

How can the Agency recognize and incorporate provisions in the planning Rule for managing lands for the sustainable delivery of ecosystem services?

Refer to response to the last question in this section.

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

Refer to response to the last question in this section.

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

Economic and social sustainability are ultimately closely tied to sustainable ecological systems. Identifying policies and management actions that facilitate multiple uses that also contribute to ecological sustainability will likely increase the certainty of output of desired goods and services supportive of local economies.

Recreation and Tourism

Effective Green Infrastructure protection and management requires a wide range of strategies, including land use regulation, acquisition, cooperative management, voluntary private action and a variety of stakeholder-based collaborative approaches. In some cases, landscape-level protection is defined through strong planning and zoning policies, often supplemented with selective acquisition. In others, land protection is established through long-standing large ownerships of federal or state agencies, supplemented with conservation and/or recreation policies.

USDA Forest Service lands are critical for Green Infrastructure protection in most counties. However local, state and federal agencies, with reduced budgets, all currently struggle with how to meet public demand for a diverse, safe, and high-quality recreation experience. The USDA Forest Service estimated in 2005 that deferred maintenance for recreation facilities (not including trails, bridges, roads and other high cost items), was \$342 million (USFS, 2008). The American Recovery and Reinvestment Act of 2009 provides some funding to address this problem, but the condition of recreation facilities and infrastructure will continue to be a concern that could affect the quality of recreation experiences, and ultimately visitation.

Resource Management and Production

Timber production in California stabilized in the early part of the last decade but has experienced a significant decline in the last few years; a trend expected to continue into 2010. In addition, the proportion of volume from public lands appears to have stabilized at a relatively low value. Jobs associated with the forest products industry are tied to economic cycles and also have exhibited a downward trend generally associated with a decline in capacity and increases in mill and logging efficiency. Softwood sawmill capacity in the western United States declined approximately eight percent from 2007-2009 with the permanent loss of 25 sawmills and the opening of three large sawmills in the Pacific Northwest (Spelter et al., 2009). In California, the loss in capacity during this time frame was 25 percent.

Forage production on some national forests in California is also a key element to ranchers. Consistent with healthy range practices, this resource should continue to be available as part of forest planning.

The Process NOI Principle of greatest importance to CAL FIRE is addressed below:

Process NOI Principle #2 Plans could incorporate an “all-lands” approach by considering the relationship between NFS lands and neighboring lands.

Comment

Contemporary land management planning principles would urge the US Forest Service to incorporate to the degree feasible an “all-lands” approach to planning, wherein the relationship between USDA Forest Service lands and neighboring lands is considered through a collaborative planning approach. Virtually all of the forest and rangeland ecosystem drivers recognized today including cumulative effects operate at scales that transcend ownership boundaries.

Specific Question(s) posed in the NOI

What other planning and assessment efforts or processes at the national, state or local level should the Agency look at that could inform an “all-lands” approach?

The concept of “working landscapes” was developed as part of CAL FIRE’s Fire and Resource Assessment Program to encompass the idea that lands used for commodity production also produce crucial ecosystem goods and services, and that future demands make it essential that these systems are managed for joint production of ecosystem services and food and fiber. A clear opportunity exists to implement strategies for improving forest stands and rangelands across California. The costs and benefits are variable, but competing for resources to implement stand improvement projects often benefits from both matching resources and economies of scale. Opportunities to tie projects to landscape plans are currently limited, especially across public/private boundaries. In addition, California’s forests and rangelands provide a variety of ecosystem services, for which the landowners are generally not compensated. As a result, the value of these services is often not given adequate consideration in the decision-making process by public agencies and private landowners.

In August of 2009, Secretary of Agriculture, Tom Vilsack, presented a strategic policy direction for the Forest Service relative to the “all lands” approach to planning. The focal issues presented were clean and abundant water, wildlife habitat, local economies through recreation and biomass energy, and climate change mitigation and adaptation. Restoration was a major theme defined as “... managing forest lands first and foremost to protect our water resources, while making our forests more resilient to climate change.” Budgeting for fire protection so that management budgets were not impacted was a priority, so that the identified policies could be implemented. Increased collaboration in planning was stressed and the loss of the forest products infrastructure was recognized as a barrier to policy implementation. Roadless area protection, the loss of private forests to development and fragmentation and the need to keep forest ownership and stewardship economically rewarding, were emphasized. The 2008 Farm Bill and emerging markets in carbon, bioenergy and water were identified as mechanisms to focus and expand landowner opportunities to maintain and restore forests.

How could the Agency foster collaborative efforts?

No comment at this time, but we are willing to have discussions with federal representatives to assist in development of an effective collaborative process for California.

What kinds of participation, forums for collaboration, and methods of providing input have you found most engaging?

No comment at this time but, we are willing to have discussions with federal representatives to assist in development of an effective collaborative process for California.

What should the rule require to ensure a planning process that is both efficient and transparent while allowing for full public collaboration and participation within a reasonable timeframe?

No comment at this time but, we are willing to have discussions with federal representatives to assist in development of an effective collaborative process for California.

What kinds of information, methods, and analyses should the Agency provide to the public during the planning process to aid understanding of the possible consequences of a proposed rule and alternatives?

No comment at this time but, we are willing to have discussions with federal representatives to assist in development of an effective collaborative process for California.

What kind of administrative review process should be offered to the public in the planning rule?

No comment at this time but, we are willing to have discussions with federal representatives to assist in development of an effective collaborative process for California.

Should there be a pre-decisional objection or a post decisional appeal process?

No comment at this time but, we are willing to have discussions with federal representatives to assist in development of an effective collaborative process for California.