



To: United States Forest Service- Ecosystem Management Coordination Staff  
From: Council of Western State Foresters  
Subject: Comments on Proposed Rule for 36 CFR 219; National Forest System  
Land Management Planning  
Date: October 22, 2007

The Council of Western State Foresters (Council) is comprised of the seventeen State Foresters and six Territorial Foresters in the West. The Council has a vested interest in the land management planning process for lands administered by the U.S. Forest Service: many of these lands border and/or surround State and private forests and constitute large areas of forest in the Western United States.

General Comments:

- The CWSF supports the expedited analysis that the Forest Service is undertaking. Tremendous amounts of human and financial resources have been spent on this planning process to date and every effort should be made to come to a swift decision on the proposed rule and proceed with LRMP revisions.
- We support every effort to streamline planning and analysis to ensure that limited program funds are allocated to project design and implementation as much as possible.
- The CWSF agrees that forest plans are procedural in nature and do not constitute a final agency action that needs to be analyzed using an environmental impact statement (EIS) or environmental assessment (EA). Contrary to some arguments, categorically excluding the planning rule from detailed analysis in an EIS or EA does in fact constitute compliance with NEPA procedures.
- The CWSF supports the strategic changes to National Forest planning proposed in the 2005 Rule. Overly-prescriptive and arbitrary standards for field-level projects do not support adaptive management in theory or practice. Careful and thoughtful implementation of an Environmental Management System will ensure that forests and all the public benefits that they provide are managed sustainably.

Specific Comments Regarding Aspects of the Proposed Rule:

- The rule should include strong guidance and mandate for collaborative planning and public involvement.
- The role of scientific uncertainty and adaptive management in land management planning should be codified in the planning rule. The efforts to do this taken by the agency to date are sufficient.
- The Forest Service must consider all three interdependent aspects of forest ecosystem management in conjunction—ecological, economic, and social—and not elevate one above the other in the process of decision-making.
- Detailed analysis of effects should be reserved for the project level where on-the-ground effects can be directly evaluated. Even though project level analysis is more likely to provide accurate estimates of effects, analyses should not shy away from admitting uncertainty and providing for robust and meaningful monitoring during the process of implementation.
- The Forest Service should direct limited agency resources towards pre-decisional collaborative planning and public involvement rather than voluminous and technical effects analysis. Because land management plans are best described as documents based more on social values and judgments about land management, public involvement and collaboration are central to their success.
- Prescriptive elements in land management plans should be minimized. These include but are not limited to such constructs as Management Indicator Species, project level standards, and strict land-use designations. This will allow for maximum flexibility when managing in concert with the uncertainty resulting from rapidly changing ecological (e.g. climate change), social (e.g. demographic changes), and economic (e.g. wood products industry changes) environments.

The CWSF applauds the analysis done to date on the planning rule and supports the efforts of the Forest Service to expedite the process and revise LRMPs in a timely fashion.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill Crapser".

Bill Crapser,  
Chair, Council of Western State Foresters