



February 16, 2010

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Forest Service Planning NOI
c/o Bear West Company
172 E 500 S
Bountiful, UT 84010

SUBJECT: Comment on the Notice of Intent (NOI) for a new National Forest System (NFS) land management planning rule.

The Council of Western State Foresters (CWSF) represents the combined interests of seventeen State Foresters and six Pacific Island Foresters in the Western United States. We appreciate the opportunity to comment on the Notice of Intent (NOI) for a new National Forest System (NFS) land management planning rule. We request that you consider these comments as the USDA Forest Service (USFS) moves forward with the development of this new rule. Due to the minimal engagement period (60-day minimum required by National Environmental Policy Act), detailed comments and suggestions will be submitted in the next phase of this process.

Many of the priorities that USDA Secretary, Tom Vilsack, has highlighted during his tenure are linked to how the USFS manages our public forest and grasslands. There is a particularly strong connection in the West between the health and sustainability of public, private and state lands. For this reason, the new planning rule must be developed to guide public land management in the context that considers ecological, social, and economic elements of sustainability.

The CWSF advocates for the new planning rule to retain an outcome-based approach while focusing on desired future conditions and measurable objectives. Principles of restoration must be included in this new planning rule as a subset of the sustainability and diversity provisions. Restoration activities assist the recovery of resilience and the adaptive capacity of ecosystems and must help support local communities' economic viability.

The CWSF members have a vested interest and broad understanding of forest conditions across all ownerships within their respective states. A detailed proposal from the CWSF will be submitted to the USFS during the next phase of the public process. We look forward to continuing to engage in this very important planning effort and working with the USFS to craft a planning rule that will meet the needs of the land managers and the public.

Please contact Caitlyn Pollihan (303-445-4363 / c.pollihan@colostate.edu) with any questions.

Sincerely,

Arthur 'Butch' Blazer, New Mexico State Forester, and
Chair, Council of Western State Foresters