



September 7, 2012

Chief Tom Tidwell
USDA Forest Service
Objection Regulation Comments
P.O. Box 4654
Logan, UT 84323

Attn: Objection Regulation Comments FS-2012-0001

Dear Chief Tidwell:

The Council of Western State Foresters (CWSF) respectfully submits the following comments in response to the U.S. Forest Service (USFS) Proposed Rule regarding expansion of the predecisional objection process based on the Healthy Forests Restoration Act (HFRA) to replace the postdecisional administrative appeal process. 77 Fed. Reg. 47337 (Aug. 8, 2012). The CWSF membership includes the directors of state forestry agencies in the seventeen western states and six Pacific Island Territories of the United States. The mission of the CWSF is to promote science-based forest management that serves the values of society and ensures the health and sustainability of western forests. We appreciate the opportunity to provide comment on the Proposed Rule.

We support the expansion of the predecisional objection process to all projects and activities carried out under land management plans and are hopeful that it will accelerate the rate of active management on National Forest System lands. Engaging stakeholders early in the decision making process should allow the development of more collaborative projects and reduce litigation costs to the Agency. Increasing active management in a collaborative manner and avoiding costly and time consuming litigation is especially important given the current budget constraints on the Agency and the growing backlog of work in our National Forests. Active management is badly needed throughout much of the National Forests to break the current cycle of overgrown forests that are driving increasingly destructive forest insect and disease outbreaks and wildland fires.

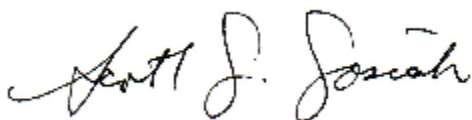
Further, we believe that the expansion of the predecisional objection process as outlined in the Proposed Rule will support work under the ongoing National Cohesive Wildland Fire Management Strategy, specifically addressing the first of three goals:

1. Restore and Maintain Landscapes: Landscapes across all jurisdictions are resilient to fire-related disturbances in accordance with management objectives.

Requiring stakeholders to be involved early in the decision making processes and providing opportunity to address concerns in the development stage, in place of objections once project decisions have already been made, should allow for better, faster and more collaborative active management.

The CWSF appreciates all of the efforts of the USFS to accelerate the rate of restoration on National Forest System lands. We believe that the predecisional objection process outlined in the Proposed Rule is needed to streamline implementation of more active management that is badly needed in our National Forests. Again, thank you for the opportunity to provide comment on the expansion of the predecisional objection process. Please contact CWSF Governmental Affairs Director, Brent Keith (brent.keith@colostate.edu or 303.445.4366), with any questions or to request additional information.

Sincerely,



Dr. Scott J. Josiah
Nebraska State Forester and
Chair, Council of Western State Foresters