



April 29, 2013  
USDA Forest Service  
Planning Directives Comments  
PO Box 40088  
Portland, OR 97240

RE: Comment on National Forest System Land Management Planning Directives

The Council of Western State Foresters (CWSF) respectfully submits the following comments in response to the USDA Forest Service (USFS) publication of the National Forest System Land Management Planning Directives in the Federal Register on February 27, 2013 (Fed. Reg. Vol. 78, NO 39). The CWSF is pleased to provide comments on the Draft Planning Directives intended to provide guidance in the implementation of the 2012 Planning Rule. The CWSF membership includes the directors of the state forestry agencies in the western United States and Pacific Islands. We work to promote science-based active forest management that serves the values of society and ensures the health and sustainability of western forests.

As the administrators of agencies responsible for the management and protection of forest resources in the western states and territories, our ability to adequately meet the needs and expectations of our constituents can be deeply influenced by the management of federally-owned lands. As such, we have a strong interest in continuing to work with our federal partners to see that these lands are managed sustainably and provide robust levels of economic, ecologic and social benefits. We appreciate the opportunity to provide comment on the Directives and request that you carefully consider our comments in revising this guidance on implementation of the 2012 Planning Rule. We have three primary concerns with the draft directives and hope that the final version is responsive to these suggestions for improvement.

**1) Though there has been a stated intention to improve the efficiency of the planning process, we are concerned that under these Directives and the 2012 Planning Rule forest plans will necessarily become even more complex, costly, time consuming and create new legal pitfalls.**

The level of prescriptiveness throughout the Directives seems ripe for legal challenge and limits the discretion for federal managers, contrary to one of the Agency's objectives in developing the new Planning Rule. In our comments on the Proposed Rule in May of 2011 we identified several concerns with introducing a new standard of "best available science." See CWSF Comments on Proposed National Forest Land Management Planning Rule, available at [http://wflcweb.org/infomaterials/letters\\_of\\_comment.php?year=2011](http://wflcweb.org/infomaterials/letters_of_comment.php?year=2011). Clearly, decision-making that is informed by the best available science is a standard to which all public resource management agencies should aspire. However, based on the language of the final rule and the Directives, we reiterate this concern. The detailed procedure for documenting the Agency's

consideration of the best available science could prove costly and result in a protracted process. We are wary that these criteria will compromise the inherent legal deference that is currently afforded to agency expertise and interpretation. Additionally, our previously identified concerns regarding the complexity and cost of completing assessments and monitoring under the 2012 Planning Rule are only deepened by the additional layers of process outlined in the Directives.

**2) We are disappointed that there is not more integration of State Forest Action Plans into Forest Land Management Plans.** Achieving the “all lands” approach is an objective State Foresters share with Forest Service leadership. There is widely accepted need to manage lands from a landscape level perspective, and we view Forest Action Plans as a critical tool for making these linkages. There are numerous opportunities within the Directives to strengthen the coordination between State Forest Action Plans and Forest Land Management Plans, such as under Section 1920.3 which states the overall policies of the planning process. Under the Handbook’s Chapter 40 States are only mentioned as part of the “Public Participation” process. We submit that coordination with State Forest Action Plans should be about integrating functions at the landscape level, not simply a procedural requirement of forest plan analysis.

**3) The philosophies and values inherent in the Directives discount the fact that economic, ecologic and social benefits are interdependent and should be treated equally.** Instead, responsible officials are told they must “ensure that plans provide for ecological sustainability” while they must only “contribute to social and economic sustainability.” (FSM 1921.03, item 2) Ecological sustainability is hard to define given a changing climate, dynamic ecosystems, and continued scientific discovery in forests. At any given point in time, sustainability is characterized by current scientific understanding reflected in the values that various publics desire – in the same way that human values define social and economic sustainability. We are concerned that requiring only ecological sustainability to be ensured will leave plans vulnerable to challenges into the future and create an unnecessary hierarchy of values. Such an approach overlooks the fact that if federal lands do not have sufficient relevance in economic and social terms that it is then unlikely that budget support will ever be sufficient to address ecological needs.

In addition to reconsidering the mandate for ecological sustainability that is implicit throughout the directives, there are certainly other places where consideration of economic and social benefits should be reinforced. For example, under the Handbook Chapter 30 – Monitoring, broad-scale monitoring should most decidedly include monitoring the impacts of plan implementation on the health and well-being of surrounding communities.

The CWSF appreciates the opportunity to provide comments on the Draft Directives. As we have stated in comments throughout this process, the ultimate measure of success of the 2012 Planning Rule will be on-the-ground accomplishments that improve forest health and the health and sustainability of local communities and economies. In this era of declining federal budgets, we all must find ways to do more with less. We believe that more resources should be put to work in actively managing our National Forests and not toward seemingly perpetual planning processes. We would welcome the opportunity to meet with the appropriate staff and discuss these concerns in more detail.