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Comments

Attached here is a .pdf file with a letter from 405 scientists. Please see the detailed comments in Attachment A, after the signatures.

Individual(s)

Organization Type	Public Interest Group/Political Party
Organization	GEOS INSTITUTE
Email Address	dominick@geosinstitute.org
Title	CHIEF SCIENTIST
Name	DOMINICK DELLASALA
Address 1	84 4TH STREET
Address 2	
City	ASHLAND
State	OREGON
Zip	97520
Country	UNITED STATES
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400 Scientists Urge the Forest Service to Require Forest Plans to Conform to Best Science and Require Strong Protections for Fish & Wildlife, Clean Water, and Key Watersheds

May 13, 2011
Forest Service Planning DEIS
c/o Bear West Company
132 E 500 S Bountiful, UT 84010

Re: Proposed National Forest System Land Management Planning Rule

Dear Forest Service Planning Team:

As scientists working in natural resource-related disciplines, we applaud the USDA Forest Service for setting a bold vision for the 193-million-acre National Forest System to guide the development, revision, and amendment of land management plans (36 CFR part 219). The agency's emphasis on climate change, forest restoration, watershed protection, and wildlife conservation are laudable objectives that we fully support.

The proposed rule places great emphasis on flexibility and local decision-making regarding forest planning decisions. We are concerned that the approach places too much authority in the hands of responsible officials at the unit level without providing guidance, including defined national standards for agency decisions. Without measurable standards and effective monitoring, forest planning will too often fail to comply with the broader purpose and intent of the National Forest System and the National Forest Management Act. While some tangible benefits may derive from planning at the local level, history shows that lack of national standards has resulted in significant losses to natural resource values important to the nation; historic examples include substantial degradation of intact areas prior to the Roadless Area Conservation Rule of 2001, ongoing loss of mature and old-growth forests, and degradation of watersheds.

Our more detailed comments on the proposed draft rule (see Attachment A, below signatures) address four areas that must be strengthened if it is to achieve its stated objectives: (1) responsible officials should not merely "*take into account*" best science, but conform forest planning to best available science; (2) each planning unit should identify and protect watersheds; (3) management decisions should be grounded in robust viability standards to safeguard wildlife populations; and (4) forest plans should safeguard and protect ecosystems (e.g., mature and old-growth forests, sensitive soils, riparian areas) vital to the health and ecological sustainability of the National Forest System.

We thank you for considering our views on this vitally important matter. Science-based management of our national forests is crucial if these systems are to continue to provide vital ecological services such as plentiful water supplies, habitat for wildlife and fish, storm and erosion control, and climate mitigation through carbon sequestration and storage. Please do not hesitate to contact us for further information or input.

Sincerely,

Dominick A. DellaSala, Ph.D.
President and Chief Scientist
Geos Institute Ashland, Oregon

Jim Karr, Ph.D. Professor Emeritus
School of Aquatic and Fish Sciences
University of Washington
Seattle, Washington

Barry Noon, Ph.D.
Professor Dept. of Fish, Wildlife, and Conservation Biology
Colorado State University
Fort Collins, Colorado

* 402 additional signatories listed below; affiliations shown for identification purposes only.

Brett Alan Adams, Ph.D. Associate Professor Utah State University Logan, Utah	Biologist III Santa Clara Valley Water District San Jose, California
Peter H. Albers, Ph.D. Research Wildlife Biologist Retired USGS Traverse City, Michigan	Richard G. Baker, Ph.D. Professor Emeritus University of Iowa Iowa City, Iowa
John Alcock, Ph.D. Emeritus Regents' Professor Arizona State University Tempe, Arizona	William L. Baker, Ph.D. Professor University of Wyoming Laramie, Wyoming
Joshua D. Amend Senior Forester Florida Division of Forestry Gainesville, Florida	Bruce Baldwin, Ph.D. W. L. Jepson Professor and Curator Jepson Herbarium / Univ. of California Berkeley, California
Frank K. Ammer, Ph.D. Associate Professor of Biology Frostburg State University Frostburg, Maryland	Katherine Bannar-Martin, M.Sc. Austin, Texas
Steven C. Anderson, Ph.D. Professor Emeritus, Biological Sciences University of Pacific Stockton, California	Jesse R. Barber, Ph.D. Assistant Professor Boise State University Boise, Idaho
William D. Anderson, Jr., Ph.D. Professor Emeritus College of Charleston Charleston, South Carolina	Linda Sue Barnes, Ph.D. Prof. Emeritus of Botany Methodist University Fayetteville, North Carolina
Warren W. Aney, M.A. Senior Wildlife Ecologist Tigard, Oregon	Frank Barnwell, Ph.D. Emeritus Professor University of Minnesota St. Paul, Minnesota
Robert G. Anthony, Ph.D. Professor of Wildlife Ecology Oregon State University Corvallis, Oregon	Carol Baskauf, Ph.D. Professor of Biology Austin Peay State University Clarksville, Tennessee
W. Scott Armbruster, Ph.D. Senior Research Scientist University of Alaska, Fairbanks Fairbanks, Alaska	Colden V. Baxter, Ph.D. Associate Professor Idaho State University Pocatello, Idaho
Don Arnold, B.S.	Peter B. Bayley, Ph.D. Oregon State University Corvallis, Oregon

E. Beever, Ph.D.
 Research Ecologist
 Bozeman, Montana
 Paul Beier, Ph.D.
 Flagstaff, Arizona
 Steven R. Beissinger, Ph.D.
 Leopold Chair of Wildlife Biology
 University of California at Berkeley
 Berkeley, California
 Craig Benkman, Ph.D.
 Professor, Zoology and Physiology
 University of Wyoming
 Laramie, Wyoming
 Michael V. L. Bennett, D. Phil.
 Professor of Neuroscience
 Albert Einstein College of Medicine
 Bronx, New York
 David J. Berg, Ph.D.
 Professor
 Miami University
 Oxford, Ohio
 Elizabeth Bergey, Ph.D.
 Associate Professor
 University of Oklahoma
 Norman, Oklahoma
 Carol M. Berman, Ph.D.
 Professor
 University at Buffalo
 Buffalo, New York
 Robert L. Beschta, Ph.D.
 Professor Emeritus
 Oregon State University
 Corvallis, Oregon
 Del Blackburn, M.S.
 Professor
 Clark College / Washington State Univ.
 Worley, Idaho
 Leo Bodensteiner, Ph.D.
 Associate Prof. and Chair

Western Washington University
 Bellingham, Washington
 Jim Boone, Ph.D.
 Chief Scientist
 Desert Wildlife Consultants
 Las Vegas, Nevada
 Arthur Boucot, Ph.D.
 Distinguished Prof. of Zoology & Geology
 Oregon State Univ.
 Corvallis, Oregon
 Richard Bradley, Ph.D.
 Associate Professor
 Ohio State University
 Marion, Ohio
 Jon Brodziak, Ph.D.
 Honolulu, Hawaii
 William R. Bromer, Ph.D.
 Professor of Biology and Env. Science
 University of St. Francis
 Joliet, Illinois
 Robert A. Brown, Ph.D.
 Professor Emeritus
 University of Washington
 Seattle, Washington
 Daniel R. Brumbaugh, Ph.D.
 Research Associate
 University of California, Santa Cruz
 Santa Cruz, California
 Jesse L. Brunner
 Assistant Professor
 Washington State University
 Pullman, Washington
 Peter F. Brussard, Ph.D.
 Professor Emeritus
 University of Nevada
 Reno, Nevada
 Jeffery Burkhart, Ph.D.
 Fletcher Jones Professor of Biology
 Claremont, California

Harold L. Burstyn, Ph.D., J.D.	Durham, North Carolina
Adjunct Professor	John A. Cigliano, Ph.D.
Syracuse University	Associate Professor of Biology
Syracuse, New York	Cedar Crest College
Paul Butler, Ph.D.	Allentown, Pennsylvania
Member of the Faculty	Neil S. Cobb, Ph.D.
The Evergreen State College	Director
Olympia, Washington	Northern Arizona University
Tom J. Cade, Ph.D.	Flagstaff, Arizona
Emeritus Professor of Zoology	Mark A. Colwell, Ph.D.
Cornell University	Professor
Boise, Idaho	Humboldt State University
John Cairns, Jr., Ph.D.	Arcata, California
Distinguished Professor Emeritus	Robert K. Colwell, Ph.D.
Virginia Tech	Board of Trustees Distinguished Professor
Blacksburg, Virginia	University of Connecticut
Bruce H. Campbell, M.S.	Storrs, Connecticut
Restoration Ecologist (ret.)	Liza Comita, Ph.D.
Junction City, Oregon	Nat'l. Center for Ecological Analysis &
Philip D. Cantino, Ph.D.	Synthesis
Professor	Santa Barbara, California
Ohio University	Bradley J. Cook, Ph.D.
Athens, Ohio	Associate Professor
Ken Carloni, Ph.D.	Minnesota State University
Associate Professor	Mankato, Minnesota
Umpqua Community College	Joseph A. Cook, Ph.D.
Roseburg, Oregon	Professor of Biology
Patrick A. Carter, Ph.D.	University of New Mexico
Associate Professor	Albuquerque, New Mexico
Washington State University	Ian M. Cooke, Ph.D.
Pullman, Washington	Emeritus Prof. of Zoology
Donna Cassidy-Hanley, Ph.D.	University of Hawaii
Ithaca, New York	Honolulu, Hawaii
Gib Chase, M.S.	Paul Corogin, M.S.
Environmental Resources Specialist	University of Florida
Federal Government (ret.)	Gainesville, Florida
Northboro, Massachusetts	Jennifer Costanza, Ph.D.
Norman L. Christensen, Ph.D.	North Carolina State University
Research Professor and Founding Dean	Raleigh, North Carolina
Nicholas School of the Environment	
Duke University	

Alan P. Covich, Ph.D. Professor of Ecology Odum School of Ecology Athens, Georgia	Paul Dayton, Ph.D. Professor Univ. of California, San Diego Solana Beach, California
Nancy E. Cowden, Ph.D. Associate Professor Lynchburg College Lynchburg, Virginia	James E. Deacon, Ph.D. Distinguished Professor Emeritus Henderson, Nevada
Hillary Boyle Cressey, D. A. Associate Professor of Biology George Mason University Fairfax, Virginia	Amy L. Denton, Ph.D. Associate Professor California State University Channel Islands Camarillo, California
Patrick J. Crist, Ph.D. Director of Conservation Planning and Ecosystem Management Broomfield, Colorado	Mark Dettling, M.S. Bolinas, California
Gretchen Daily, Ph.D. Bing Prof. of Environmental Science Stanford University Stanford, California	Andre Dhondt, Ph.D. Professor Cornell University Ithaca, New York
Thomas J. Daniels, Ph.D. Associate Research Scientist Fordham University Armonk, New York	Alan Dickman, Ph.D. Program Director, Environmental Studies University of Oregon Eugene, Oregon
Satish Davgun, Ph.D. Professor of Geography Bemidji State University Bemidji, Minnesota	Brett G. Dickson, Ph.D. Research Professor Northern Arizona University Flagstaff, Arizona
Luise Davis, Ph.D. Certified Wetlands Scientist (ret.) Pittsburgh, Pennsylvania	Dana E. Dolsen, M.Sc. Holladay, Utah
Heather Dawson, Ph.D. Assistant Professor University of Michigan, Flint Flint, Michigan	Sky Dominguez, M.S. University of Arizona Tucson, Arizona
John Dayton, M.A. Lecturer/Technician San Jose State University San Jose, California	Richard J. Douglass, Ph.D. Professor of Biology Montana Tech, Univ. of Montana Butte, Montana
	Elizabeth D. Dreelin, Ph.D. Columbus, Georgia
	Kenneth Driese, Ph.D. University of Wyoming Laramie, Wyoming

Peter Dunwiddie, Ph.D.	Professor/Curator
Ecologist	University of Michigan
University of Washington	Ann Arbor, Michigan
Seattle, Washington	Thomas L. Fleischner, Ph.D.
Vern Durkee, Ph.D.	Professor of Environmental Studies
Professor Emeritus	Prescott College
Grinnell College	Prescott, Arizona
Ithaca, New York	Henri Folse, Ph.D.
Scott V. Edwards, Ph.D.	San Francisco, California
Professor and Curator	M. Jesse Ford, Ph.D.
Harvard University	Associate Professor (Research)
Cambridge, Massachusetts	Oregon State University
Norman Ellstrand, Ph.D.	Corvallis, Oregon
Professor of Genetics	Johannes Foufopoulos, Ph.D.
Univ. of California, Riverside	Associate Professor
Riverside, California	University of Michigan
Tracy R. Evans, M.S.	Ann Arbor, Michigan
Illinois Department of Natural Resources	Michael W. Fox, Ph.D., D.Sc.
Springfield, Illinois	Private consultant
Jonathan Evans, Ph.D.	Minneapolis, Minnesota
Professor of Biology	Jennifer K. Frey, Ph.D.
University of the South	Colelge Associate Professor
Sewanee, Tennessee	New Mexico State University
Doug Eveleigh, Ph.D.	Las Cruces, New Mexico
Chair of Applied Microbiology	Jon M. Friedrich, Ph.D.
Rutgers University	Assistant Professor
New Brunswick, New Jersey	Fordham University
Tracy S. Feldman, Ph.D.	Bronx, New York
Assistant Professor of Biology	Christopher A. Frissell, Ph.D.
University of Wisconsin Stevens Point	Director of Science and Conservation
Stevens Point, Wisconsin	Pacific Rivers Council
Rebe Feraldi, M.S.	Polson, Montana
Environmental Scientist	Gerald V. Frost, Jr., Ph.D. candidate
ERG	University of Virginia
Prairie Village, Kansas	Charlottesville, Virginia
Doug Fischer, Ph.D.	Robert R. Fuerstenberg, M.S.
Researcher	Senior Ecologist
Univ. of California, Santa Barbara	Land and Water Sciences
Santa Barbara, California	Vashon, Washington
Daniel C. Fisher, Ph.D.	

Jed Fuhrman, Ph.D.
 McCulloch-Crosby Chair of Marine Biology
 University of Southern California
 Los Angeles, California
 Stephen W. Fuller, Ph.D.
 Professor of Biological Sciences
 University of Mary Washington
 Fredericksburg, Virginia
 A. John Gatz, Ph.D.
 Professor of Zoology
 Ohio Wesleyan University
 Delaware, Ohio
 Daniel G. Gavin, Ph.D.
 Associate Professor
 University of Oregon
 Eugene, Oregon
 T. Luke George, Ph.D.
 Professor
 Humboldt State University
 Arcata, California
 Alexander Gershenson, Ph.D.
 Adjunct Professor
 San Jose State University
 San Jose, California
 Jennifer Gervais, Ph.D.
 Wildlife Ecologist
 Oregon Wildlife Institute
 Corvallis, Oregon
 James A. Gessaman, Ph.D.
 Professor
 Utah State University
 Logan, Utah
 Thomas W. Giesen, M.S.
 Forestry
 Lorane, Oregon
 Barrie K. Gilbert, Ph.D.
 Senior Scientist
 Utah State University (ret.)
 Logan, Utah
 Bob Gillespie, Ph.D.
 Program Coordinator, Ag & Natural Resources
 Entomological Society of America
 Wenatchee, Washington
 Randall G. Gloege, Ph.D.
 Environmental Studies
 Billings, Montana
 Scott Goetz, Ph.D.
 Senior Scientist
 Woods Hole Research Center
 Falmouth, Massachusetts
 Enrique Gomezdelcampo, Ph.D.
 Associate Professor
 Bowling Green State University
 Bowling Green, Ohio
 Robert Good, M.S., DVM
 Chester, Maryland
 David A. Gray, Ph.D.
 Professor
 California State University
 Northridge, California
 Steven Green, Ph.D.
 Professor
 University of Miami
 Coral Gables, Florida
 Jon Grinnell, Ph.D.
 F. M. Uhler Chair in Biology
 Gustavus Adolphus College
 Saint Peter, Minnesota
 Paul A. Groff, Ph.D.
 Director
 John C. Gifford Arboretum
 Coral Gables, Florida
 Michael Hadjiargyrou, Ph.D.
 Associate Professor
 Stony Brook University
 Coram, New York
 Suzanne Hagell, Ph.D.
 Northern Arizona University
 Flagstaff, Arizona

John Hall, Ph.D. Professor Emeritus West Virginia University Morgantown, West Virginia	Ken R. Helms, Ph.D. Research Professor University of Vermont Burlington, Vermont
Richard Halsey, M.A. Director California Chaparral Institute Escondido, California	Colin P. Henderson, M.S. Vice President T.Y. Lin International Miami, Florida
Ralph S. Hames, Ph.D. Research Associate Cornell Lab of Ornithology Ithaca, New York	Robert E. Henshaw, Ph.D. Environmental Analyst State Dept. of Environmental Conservation Albany, New York
Steven W. Hamilton, Ph.D. Director, Center for Field Biology Austin Peay State University Clarksville, Tennessee	Scott Herron, Ph.D. Associate Professor Ferris State University Big Rapids, Michigan
Chad Hanson, Ph.D. Director and Staff Scientist John Muir Project of Earth Island Institute Cedar Ridge, California	Jeffery M. Hill, Ph.D. Professor University of North Carolina, Wilmington Wilmington, North Carolina
Cheryl Harding, Ph.D. Professor Hunter College Stanton, New Jersey	Bill Hilton, Jr., M.S., M.A.T. Executive Director Hilton Pond Ctr. for Piedmont Natural History York, South Carolina
Stacey Harmer, Ph.D. Associate Professor University of California, Davis Davis, California	Anya Hinkle, Ph.D. Associate Director University of North Carolina Highlands, North Carolina
Tanner B. Harris, M.S. Kent, Washington	Karen D. Holl, Ph.D. Professor and Chair Environmental Studies Department, University of California, Santa Cruz Santa Cruz, California
Robert T. Heath, Ph.D. Professor Emeritus Kent State University Kent, Ohio	John R. Holloway, Ph.D. Research Professor Arizona State University Ashland, Oregon
Alan Heath, Ph.D. Professor Emeritus Virginia Tech Blacksburg, Virginia	Richard T. Holmes, Ph.D. Research Professor of Biology Dartmouth College Hanover, New Hampshire
Leanna R Heffner, Ph.D. Candidate University of Rhode Island Narragansett, Rhode Island	

Jonathan Horton, Ph.D.
Associate Professor
University of North Carolina, Asheville
Asheville, North Carolina
David V. Howe, M.S.
Rutgers University
New Brunswick, New Jersey
Edward Huang, Ph.D.
Principal
CIEDM
Arcadia, California
Gregory M. Huey
NM Environment Department
Santa Fe, New Mexico
Malcolm Hunter, Ph.D.
Libra Professor of Conservation Biology
University of Maine
Amherst, Maine
John J. Hutchens, Jr., Ph.D.
Associate Professor of Biology
Coastal Carolina University
Conway, South Carolina
R. L. Hutto, Ph.D.
Professor and Director
Avian Science Center
Missoula, Montana
Laura A. Hyatt, Ph.D.
Associate Dean for Science
Rider University
Lawrence Township, New Jersey
Thomas F. Ihde, Ph.D.
Fisheries/ Ecosystem Modeler
Lusby, Maryland
Harry Itagaki, Ph.D.
Professor of Biology
Kenyon College
Gambier, Ohio
Jerome A. Jackson, Ph.D.
Professor of Ecological Sciences
Florida Gulf Coast University

Ft. Myers, Florida
David P. Janos, Ph.D.
Professor of Biology
University of Miami
Coral Gables, Florida
Patrick Jantz, MESM
University of California, Santa Barbara
Santa Barbara, California
Daniel H. Janzen, Ph.D.
Professor of Conservation Biology
University of Pennsylvania
Philadelphia, Pennsylvania
David G. Jenkins, Ph.D.
Associate Professor
University of Central Florida
Orlando, Florida
Wayne Jenkins,
Executive Director
Georgia Forest Watch
Ellijay, Georgia
Mitchell Johns, Ph.D.
Professor of Soil Science
California State University
Chico, California
Stephen Thor Johnson, MCP
Bullard Fellow
Harvard University
Petersham, Massachusetts
Gail F. Johnston, Ph.D.
Professor
Lindenwood University
St. Charles, Missouri
Jay Jones, Ph.D.
Professor of Biology and Biochemistry
University of La Verne
La Verne, California
Alan Journet, Ph.D.
ClimateWise Program Manager
Geos Institute
Ashland, Oregon

David Karowe, Ph.D.
 Professor
 Western Michigan University
 Kalamazoo, Michigan

Sterling C. Keeley, Ph.D.
 Professor of Botany
 University of Hawaii, Manoa
 Honolulu, Hawaii

Bruce Kirchoff, Ph.D.
 Associate Professor
 University of North Carolina, Greensboro
 Greensboro, North Carolina

Amy R. Kireta, M.S.
 Research Fellow
 University of Minnesota, Duluth
 Ely, Minnesota

R. Lawrence Klotz, Ph.D.
 Distinguished Teaching Professor
 State University of New York, Cortland
 Cortland, New York

Jason A. Koontz, Ph.D.
 Associate Professor
 Augustana College
 Rock Island, Illinois

Marni Koopman, Ph.D.
 Climate Change Scientist
 Geos Institute
 Ashland, Oregon

Julie E. Korb, Ph.D.
 Associate Professor
 Fort Lewis College
 Durango, Colorado

Kenneth H. Kozak, Ph.D.
 Professor
 University of Minnesota
 St. Paul, Minnesota

Andrew Kramer, Ph.D.
 University of Georgia
 Athens, Georgia

Dana Krempels, Ph.D.
 Senior Lecturer
 University of Miami
 Coral Gables, Florida

Sunil Kumar, Ph.D.
 Research Scientist
 Natural Resource Energy Lab
 Fort Collins, Colorado

Erin Kuprewicz, Ph.D.
 Washington, D.C.

John P. LaBonte, Ph.D.
 Post-Doctoral Researcher
 University of California, Santa Barbara
 Santa Barbara, California

Steve LaDochy, Ph.D.
 Professor of Geography
 California State Univ., Los Angeles
 Los Angeles, California

Rebecca S. Lamb, Ph.D.
 Assistant Professor
 Ohio State University
 Columbus, Ohio

John W. Lamperti, Ph.D.
 Professor of Mathematics, Emeritus
 Dartmouth College
 Hanover, New Hampshire

Rick Landenberger, Ph.D.
 Research Assistant Professor
 Ecological Society of America
 Morgantown, West Virginia

Kim J. Landsbergen, Ph.D.
 Carbon Ecology Consulting LLC
 Columbus, Ohio

Marc Lapin, Ph.D.
 Program in Environmental Studies, Middlebury
 College
 Middlebury, Vermont

Eileen Larney, M.A., Ph.D. candidate
 Chief Technical Advisor
 Institute for the Conservation of Tropical
 Environments, Stony Brook University
 Washingtonville, New York

Beverly Law, Ph.D.
 Professor, Global Change & Forest Science
 ESA, AAAS, AGU, Aldo Leopold Fellow
 Corvallis, Oregon
 Mina Lebitz, M.S.
 Brooklyn, New York
 Paul A. Lefebvre, Ph.D.
 Professor, Plant Biology
 University of Minnesota
 St. Paul, Minnesota
 Scott Lefler, Ph.D.
 Senior Lecturer
 Arizona State University
 Tempe, Arizona
 James M. Le Moine, M.S.
 Research Laboratory Specialist
 University of Michigan
 Ann Arbor, Michigan
 Simon Levin, Ph.D.
 Professor
 Princeton University
 Princeton, New Jersey
 J. D. Lewis, Ph.D.
 Associate Professor
 Fordham University
 Bronx, New York
 William Z. Lidicker, Jr., Ph.D.
 Professor Emeritus
 University of California, Berkeley
 Berkeley, California
 Gene E. Likens, Ph.D.
 Distinguished Senior Scientist
 Cary Institute of Ecosystem Studies
 Millbrook, New York
 Jason A. Lillegraven, Ph.D.
 Distinguished Emeritus Professor
 The University of Wyoming
 Laramie, Wyoming
 Joshua Linder, Ph.D.
 Assistant Professor
 Biological Anthropology
 Harrisonburg, Virginia
 Brian D. Linkhart, Ph.D.
 Associate Professor
 Colorado College
 Colorado Springs, Colorado
 Frank Logiudice, M.Sc.
 Undergraduate Program Coordinator &
 Instructor
 University of Central Florida
 Orlando, Florida
 Rainer Lohmann, Ph.D.
 Associate Professor of Oceanography
 University of Rhode Island
 Narragansett, Rhode Island
 Travis Longcore, Ph.D.
 Associate Professor (Research)
 University of Southern California
 Los Angeles, California
 Thomas Lovejoy, Ph.D.
 George Mason University
 Fairfax, Virginia
 Marvin M. F. Lutnesky, Ph.D.
 Biology Professor and Chair
 Eastern New Mexico University
 Portales, New Mexico
 Luis Malaret, Ph.D.
 Professor
 Community College of Rhode Island
 Worcester, Massachusetts
 Debora L. Mann, Ph.D.
 Assistant Professor
 Millsaps College
 Jackson, Mississippi
 James H. Marden, Ph.D.
 Professor
 Penn State University
 University Park, Pennsylvania
 Erika Marin-Spiotta, Ph.D.
 Assistant Professor
 University of Wisconsin
 Madison, Wisconsin

Travis D. Marsico, Ph.D.
 Assistant Professor and Curator
 Arkansas State Univ., STAR Herbarium
 State University, Arkansas
 Janet Marsden, M.S., MPS
 Syracuse University
 Syracuse, New York
 Michael Marsh, Ph.D.
 Conservation Committee
 Washington Native Plant Society
 Seattle, Washington
 Patrick Martin, Ph.D.
 Assistant Professor
 Colorado State University
 Fort Collins, Colorado
 Christopher Marx, Ph.D.
 Associate Professor
 Harvard University
 Cambridge, Massachusetts
 John M. Marzluff, Ph.D.
 Professor of Wildlife Science
 University of Washington
 Seattle, Washington
 Dale A. McCullough, Ph.D.
 Senior Scientist
 Columbia River Inter-Tribal Fish Comm.
 Portland, Oregon
 Carl N. McDaniel, Ph.D.
 Visiting Professor and Professor Emeritus
 Oberlin College, Rensselaer Polytechnic Inst.
 Oberlin, Ohio
 William H. McDowell, Ph.D.
 Professor
 University of New Hampshire
 Durham, New Hampshire
 Robert M. McElderry, M.S.
 Doctoral Candidate
 University of Miami
 Miami, Florida
 John McLaughlin, Ph.D.
 Associate Professor
 Western Washington University
 Bellingham, Washington
 Gary K. Meffe, Ph.D.
 Consulting Editor
 University of Florida
 Gainesville, Florida
 Vicky J. Meretsky, Ph.D.
 Associate Professor
 Indiana University
 Bloomington, Indiana
 Julie Messier, M.Sc.
 University of Arizona
 Tucson, Arizona
 George Middendorf, Ph.D.
 Professor
 Howard University
 Washington, D.C.
 Brian T. Miller, Ph.D.
 Professor
 Middle Tennessee State University
 Murfreesboro, Tennessee
 G. Wayne Minshall, Ph.D.
 Professor of Ecology (Emeritus)
 Idaho State University
 Pocatello, Idaho
 Kailen Mooney, Ph.D.
 Assistant Professor
 University of California
 Irvine, California
 Vicki Moore, M.S.
 Arizona State University
 Tempe, Arizona
 Toni Lyn Morelli, Ph.D.
 U.C. Berkeley
 Berkeley, California
 John C. Morse, Ph.D.
 Professor Emeritus
 Clemson University
 Clemson, South Carolina

Peter B. Moyle, Ph.D.	Provo, Utah
Professor	John C. Nemeth, Ph.D.
University California, Davis	President
Davis, California	AAAS, UCS, Sigma XI
Rob Mrowka, M.S.	Christiansburg, Virginia
Ecologist	Julia Nerbonne, Ph.D.
Center for Biological Diversity	Program Director
North Las Vegas, Nevada	Higher Ed. Consortium for Urban Affairs
John F. Mull, Ph.D.	St. Paul, Minnesota
Professor of Zoology	William D. Newmark, Ph.D.
Weber State University	Research Curator
Ogden, Utah	University of Utah
Richard H. Munson, Ph.D.	Salt Lake City, Utah
Conservation Director	Gerald J. Niemi, Ph.D.
Audubon Miami Valley	Professor
Oxford, Ohio	Natural Resources Research Institute
K. Greg Murray, Ph.D.	Duluth, Minnesota
Professor of Biology	Brandon L. Noel, Ph.D.
Hope College	Arkansas State University
Holland, Michigan	Jonesboro, Arkansas
Olin Eugene Myers Jr., Ph.D	Theresa Nogeire,
Professor	University of California
Western Washington University	Santa Barbara, California
Bellingham, Washington	J. Cully Nordby, Ph.D.
Philip Myers, Ph.D.	Academic Director
Professor	UCLA Inst. of Environment & Sustainability
University of Michigan	Los Angeles, California
Ann Arbor, Michigan	Reed F. Noss, Ph.D.
Dhruba Naug, Ph.D.	Professor
Associate Professor	University of Central Florida
Colorado State University	Orlando, Florida
Fort Collins, Colorado	Cassandra Nunez, Ph.D.
Charles R. Neal, B.S.	Associate Research Scholar
Ecologist	Princeton University
U.S. Dept. of Interior (ret.)	Princeton, New Jersey
Cody, Wyoming	Richard Nyhof, Ph.D.
C. Riley Nelson, Ph.D.	Professor of Biology
Professor	Calvin College
Brigham Young University	Grand Rapids, Michigan

Dennis C. Odion, Ph.D
 Vegetation Ecologist
 Southern Oregon University
 Ashland, Oregon
 Charles Olmsted, Ph.D
 Professor Emeritus of Env. Studies
 University of Northern Colorado
 Greeley, Colorado
 Richard S. Ostfeld, Ph.D.
 Senior Scientist
 Cary Institute of Ecosystem Studies
 Millbrook, New York
 Rebekah Outman, B.S.
 Ph.D. Candidate
 University of Miami
 Miami, Florida
 Michael S. Parker, Ph.D.
 Professor of Biology
 Southern Oregon University
 Ashland, Oregon
 Harmony Patricio, MPA
 Conservation Director
 Santa Cruz, California
 Dennis R. Paulson, Ph.D.
 Director Emeritus
 Slater Museum, Univ. of Puget Sound
 Tacoma, Washington
 Gustav Paulay, Ph.D.
 Curator / Professor
 Florida Museum of Natural History
 Gainesville, Florida
 Megan Paustian, Ph.D.
 Collection Manager
 Carnegie Museum of Natural History
 Pittsburgh, Pennsylvania
 Esther C. Peters, Ph.D.
 Assistant Professor
 George Mason University
 Fairfax, Virginia
 Steven Phillips, Ph.D.
 AT&T Labs-Research
 Florham Park, New Jersey
 J. Dan Pittillo, Ph.D.
 Professor
 Western Carolina University (ret.)
 Sylva, North Carolina
 Ralph Powell, Ph.D.
 Faculty Emeritus
 Eastern Michigan
 Ann Arbor, Michigan
 Roger A. Powell, Ph.D.
 Prof. Emeritus of Biology
 North Carolina State University
 Raleigh, North Carolina
 Thomas Michael Power, Ph.D.
 Professor Emeritus
 University of Montana
 Missoula, Montana
 Jessica Pratt, M.S.
 Ecologist
 University of California, Irvine
 Irvine, California
 Ben Prater, MEM
 Associate Director
 Wild South
 Asheville, North Carolina
 Mary V. Price, Ph.D.
 Professor of Biology, Emerita
 University of California, Riverside
 Riverside, California
 James J. Provenzano, C.Ph.
 President
 Clean Air Now
 Los Angeles, California
 Laura Prugh, Ph.D.
 Univ. of California, Berkeley
 Berkeley, California
 Robert Pyle, Ph.D.
 Founder
 Xerces Society
 Gray's River, Washington

James A. Quinn, Ph.D.
 Professor Emeritus
 Rutgers University
 New Brunswick, New Jersey

Theodore K. Raab, Ph.D.
 Senior Scientist
 Stanford University
 Palo Alto, California

John T. Ratti, Ph.D.
 Professor (ret.)
 University of Idaho
 New Meadows, Idaho

Gordon Rausser, Ph.D.
 Robert Sproul Distinguished Professor
 Univ. of California, Berkeley
 Berkeley, California

Richard P. Reading, Ph.D.
 Associate Research Professor
 University of Denver
 Denver, Colorado

J. Michael Reed, Ph.D.
 Professor
 Tufts University
 Medford, Massachusetts

Jill Reid, M.S.
 Assistant Teaching Professor
 Virginia Commonwealth University
 Richmond, Virginia

Michael Rentz
 University of Minnesota
 Duluth, Minnesota

Barbara C. Reynolds, Ph.D.
 Professor
 University of North Carolina, Asheville
 Asheville, North Carolina

Tina Rhea, M.S.
 Greenbelt, Maryland

Ann F. Rhoads, Ph.D.
 Senior Botanist
 University of Pennsylvania
 Philadelphia, Pennsylvania

Fred M. Rhoades, Ph.D.
 Instructor (ret.) & Research Associate
 Western Washington University
 Bellingham, Washington

Hedda Ribolow, Ph.D.
 Teaneck, New Jersey

Jennifer Riddell, Ph.D.
 Science and Technology Policy Fellow
 American Assn. for the Advancement of Science
 Washington, D.C.

David W. Roberts, Ph.D.
 Professor
 Montana State University
 Bozeman, Montana

Dina Roberts, Ph.D.
 Conservation Scientist
 International Boreal Conservation Campaign
 Seattle, Washington

Bruce Robertson, Ph.D.
 Postdoctoral Fellow
 Smithsonian Conservation Biology Institute
 Washington, D.C.

George Robinson, Ph.D.
 Professor
 University at Albany, SUNY
 Albany, New York

Sarah Rockwell, M.Sc.
 University of Maryland
 College Park, Maryland

Donald Rodriguez, Ph.D.
 Professor and Chair
 California State University Channel Islands
 Camarillo, California

Javier Rodriguez, Ph.D.
 Associate Professor
 University of Nevada
 Las Vegas, Nevada

Gary W. Roemer, Ph.D.
 Associate Professor
 New Mexico State University
 Las Cruces, New Mexico

Garry F. Rogers, Ph.D.
 President
 Agua Fria Open Space Alliance, Inc.
 Humboldt, Arizona
 David Roland-Holst, Ph.D.
 Professor
 University of California, Berkeley
 Berkeley, California
 Thomas Rooney, Ph.D.
 Associate Professor
 Wright State University
 Dayton, Ohio
 Terry L. Root, Ph.D.
 Senior Fellow
 Woods Institute for the Environment
 Stanford, California
 Jon Rosales, Ph.D.
 Associate Professor
 St. Lawrence University
 Canton, New York
 Robert K. Rose, Ph.D.
 Professor Emeritus
 Old Dominion University
 Norfolk, Virginia
 Amy Y. Rossman, Ph.D.
 Research Leader
 USDA-ARS
 Beltsville, Maryland
 Donald S. Ross, Ph.D.
 Research Associate Professor
 University of Vermont
 Burlington, Vermont
 Eric Routman, Ph.D.
 Professor of Biology
 San Francisco State University
 San Francisco, California
 Matthew Rubino
 Conservation Biologist / GIS Analyst
 North Carolina State University
 Raleigh, North Carolina

Roger W. Ruess, Ph.D.
 Professor of Biology
 University of Alaska
 Fairbanks, Alaska
 Sam Rushforth, Ph.D.
 Dean of Science
 Professional Ecologist
 Orem, Utah
 Ann Sakai, Ph.D.
 Professor
 University of California, Irvine
 Irvine, California
 Nicanor Saliendra, Ph.D.
 Forest Biometeorologist
 American Geophysical Union
 Catonsville, Maryland
 Robin S. Salter, Ph.D.
 Associate Professor of Biology
 Oberlin College
 Oberlin, Ohio
 Scott Samuels, Ph.D.
 Professor
 University of Montana
 Missoula, Montana
 Ira D. Sasowsky, Ph.D.
 Professor, Geology and Env. Science
 University of Akron
 Akron, Ohio
 Melissa Savage, Ph.D.
 Professor Emerita
 University of California, Los Angeles
 Santa Fe, New Mexico
 James A. Sawitzke, Ph.D.
 Scientist
 Frederick, Maryland
 John O. Sawyer, Ph.D.
 Professor Emeritus of Botany
 Humboldt State University
 Arcata, California

Paul J Schaeffer, Ph.D.
 Assistant Professor
 Dept. of Zoology, Miami University
 Oxford, Ohio
 Hanno Schaefer, Ph.D.
 Harvard University
 Watertown, Massachusetts
 Joseph R. Schiller, Ph.D.
 Professor
 Austin Peay State University
 Clarksville, Tennessee
 John W. Schoen, Ph.D.
 Senior Science Advisor
 Audubon Alaska
 Anchorage, Alaska
 Kate Schoeneker, Ph.D.
 Ecologist
 USGS and Colorado State Univeristy
 Fort Collins, Colorado
 Courtney Schultz, Ph.D.
 Assistant Professor
 Colorado State University
 Fort Collins, Colorado
 Alison Seigel, Ph.D.
 Middlebury College
 Middlebury, Vermont
 Gerald Sgro, Ph.D.
 Researcher
 Cleveland Heights, Ohio
 Mark D. Shapley, Ph.D.
 Postdoctoral Research Associate
 Idaho State University
 Pocatello, Idaho
 Kathleen L. Shea, Ph.D.
 Professor of Biology
 St. Olaf College
 Northfield, Minnesota
 Thomas W. Sherry, Ph.D.
 Professor
 American Ornithologists' Union, Ecological
 Society of America

New Orleans, Louisiana
 Rebecca A. Sherry, Ph.D.
 Research Assistant Professor
 University of Oklahoma
 Norman, Oklahoma
 Marcia Shofner, Ph.D.
 Assistant Director, Biological Sciences
 University of Maryland
 College Park, Maryland
 Herman H. Shugart, Ph.D.
 William W. Corcoran Professor
 University of Virginia
 Charlottesville, Virginia
 Rodney B. Siegel, Ph.D.
 Executive Director
 The Institute for Bird Populations
 Point Reyes Station, California
 Derek Sikes, Ph.D.
 Curator of Insects, Assoc. Prof. of Entomology
 University of Alaska
 Fairbanks, Alaska
 Jack W. Sites, Jr., Ph.D.
 Professor of Biology, Curator of Herpetology
 Brigham Young University
 Provo, Utah
 Isaac Skromne, Ph.D.
 Assistant Professor
 University of Miami
 Coral Gables, Florida
 David L. Smith, Ph.D.
 Assoc. Professor of Natural Systems Science
 Le Moyne College
 Syracuse, New York
 Douglas Smith, Ph.D.
 Professor
 California State Univ., Monterey Bay
 Seaside, California
 Nicholas J. Smith-Sebasto, Ph.D.
 Exec. Dir., Center for Sustainability Studies
 Kean Unviersity
 Union, New Jersey

Richard H. Smith, Ph.D., MBA
 Research Director
 Insight Inst. of Neurosurgery & Neuroscience
 Flint, Michigan

Anthony Snider, Ph.D.
 Assistant Professor
 University of North Carolina, Wilmington
 Wilmington, North Carolina

Mark T. Southerland, Ph.D.
 Principal Ecologist
 Versar, Inc.
 Columbia, Maryland

John Sovell
 Colorado State University
 Fort Collins, Colorado

Wayne D. Spencer, Ph.D.
 Senior Conservation Biologist
 Conservation Biology Institute
 San Diego, California

Timothy P. Spira, Ph.D.
 Professor
 Clemson University
 Clemson, South Carolina

Peter B Stacey, Ph.D.
 Research Professor
 University of New Mexico
 Albuquerque, New Mexico

Pamela Stanley, Ph.D.
 Horace W. Goldsmith Professor
 Albert Einstein College of Medicine
 New York, New York

Robert S. Stelzer, Ph.D.
 Associate Professor of Ecosystem Ecology
 Oshkosh, Wisconsin

Hannah Stevens, M.A.
 GIS Program Manager
 New York Botanical Garden
 Bronx, New York

Hank Stevens, Ph.D.
 Associate Professor
 Ecological Society of America
 Oxford, Ohio

Glenn R. Stewart, Ph.D.
 Professor Emeritus
 California State Polytechnic University
 Pomona, California

Christopher Still, Ph.D.
 Associate Professor of Geography
 Univ. of California, Santa Barbara
 Santa Barbara, California

Guenther Stotzky, Ph.D.
 Professor Emeritus
 New York University
 New York, New York

Richard R. Strathmann, Ph.D.
 Professor Emeritus
 University of Washington
 Friday Harbor, Washington

John D. Styrsky, Ph.D.
 Assistant Professor of Biology
 Lynchburg College
 Lynchburg, Virginia

Susan M. Swensen, Ph.D.
 Associate Professor
 Ithaca, New York

Michael C. Swift, Ph.D.
 Assistant Professor
 St. Olaf College
 Northfield, Minnesota

Adam Switalski, M.S.
 Science Program Director
 Wildlands CPR
 Missoula, Montana

Melanie Szulczewski, Ph.D.
 Assistant Professor
 University of Mary Washington
 Fredericksburg, Virginia

Robert Tafaelli, Ph.D.
 New Mexico State University (ret.)
 Las Cruces, New Mexico

Stephen Tettelbach, Ph.D.
 Professor of Biology
 Long Island University
 Brookville, New York
 Edward R. Thornton, Ph.D.
 Professor of Chemistry
 University of Pennsylvania
 Philadelphia, Pennsylvania
 Paul F. Torrence, Ph.D.
 Emeritus Professor
 Northern Arizona University
 Williams, Oregon
 Pepper W. Trail, Ph.D.
 Ashland, Oregon
 V. Tripoli, Ph.D.
 Ashland, Oregon
 Stephen C. Trombulak, Ph.D.
 Professor of Env. and Biosphere Studies
 Middlebury College
 Middlebury, Vermont
 Walter R. Tschinkel, Ph.D.
 Professor
 Florida State University
 Tallahassee, Florida
 Julie P. Tuttle, M.S.
 University of North Carolina at Chapel Hill
 Chapel Hill, North Carolina
 Rob Tyser, Ph.D.
 Professor
 University of Wisconsin-La Crosse
 La Crosse, Wisconsin
 Christopher A. Underwood, M.S.
 University of Tennessee
 Knoxville, Tennessee
 Dean Urban, Ph.D.
 Professor of Landscape Ecology
 Duke University
 Durham, North Carolina
 Rick Van de Poll, Ph.D.

Society of Wetland Scientists
 Sandwich, New Hampshire
 Mike Vanderman, Ph.D.
 San Ramon, California
 David R. Vann, Ph.D.
 University of Pennsylvania
 Philadelphia, Pennsylvania
 S. K. Vitazkova, Ph.D.
 Fairfax, Virginia
 Robert O. Wagner, Ph.D.
 Senior Ecologist
 DeRidder, Louisiana
 Nicole Wagner, Ph.D.
 Bozeman, Montana
 Robert B. Waide, Ph.D.
 Executive Director
 University of New Mexico LTER Network
 Albuquerque, New Mexico
 Greg Walker, Ph.D.
 Professor
 University of California, Riverside
 Riverside, California
 David O. Wallin, Ph.D.
 Professor of Env. Sciences
 Western Washington University
 Bellingham, Washington
 Donald M. Waller, Ph.D.
 Professor, Botany and Env. Studies
 University of Wisconsin
 Madison, Wisconsin
 Richard T. Ward, Ph.D.
 Emeritus Professor of Botany
 Colorado State Univ. (ret.)
 Fort Collins, Colorado
 Gerald J. Wasserburg, Ph.D.
 Professor Emeritus, Geology & Geophysics
 California Institute of Technology
 Florence, Oregon

Michelle Waterman, M.S.
Sustainability Project Coordinator
George Mason University
Fairfax, Virginia
Vicki Watson, Ph.D.
Professor of Environmental Studies
University of Montana
Missoula, Montana
Michael Webster, Ph.D.
Robert Engel Assoc. Professor of Ornithology
Cornell University
Ithaca, New York
John D. Wehr, Ph.D.
Professor of Biological Sciences
Fordham University
Armonk, New York
Judith S. Weis, Ph.D.
Rutgers University
Newark, New Jersey
Allison Welch, Ph.D.
Assistant Professor
College of Charleston
Charleston, South Carolina
Hartwell H. Welsh, Jr., Ph.D.
USFS Pacific SW Research Station
Arcata, California
Eric Von Wettberg, Ph.D.
Assistant Professor
Florida International University
Miami, Florida
David F. Whitacre, Ph.D.
Treasure Valley Math and Science Center
Boise, Idaho
Edward A. Whitesell, Ph.D.
Member of the Faculty
Evergreen State College
Olympia, Washington
Sarah B. Whorley, M.Sc.
Fordham University
Bronx, New York
Sue Wick, Ph.D.
Professor of Plant Biology
University of MN
St. Paul, Minnesota
Norris H. Williams, Ph.D.
Curator
University of Florida
Gainesville, Florida
Gene Willeke, Ph.D.
Miami University
Oxford, Ohio
Denise C. Wilson, M.Sc.
Int'l. Union for Conservation of Nature
Golden, Colorado
David Wilson, Ph.D.
Professor of Biology
University of Miami

Coral Gables, Florida
W. Herbert Wilson, Jr., Ph.D.
Professor of Biology
Colby College
Waterville, Maryland
Shaye Wolf, Ph.D.
Kensington, California
Mark D. Womble, Ph.D.
Associate Professor of Biological Sciences
Youngstown State University
Youngstown, Ohio
Marianna D. Wood, Ph.D.
Associate Professor
Bloomsburg University
Bloomsburg, Pennsylvania
Bruce Wright, Ph.D.
Executive Director
Conservation Science Institute
Palmer, Alaska
Charlotte B. Zampini, Ph.D.
Associate Professor
Framingham State University
Framingham, Massachusetts

ATTACHMENT A: More Detailed Comments from Scientists

1. Require Forest Plans to Conform to Best Available Science

The proposed rule includes discretionary language regarding the application of science to decision making whereby responsible officials are directed to —*take into account*¹ (e.g., 36 CFR Part 219, p. 3) or —*consider*¹ (e.g., 36 CFR Part 219, p. 4) best available science. Absent clear direction, forest plans may not comport to best available science, particularly when pressures on responsible officials produce outcomes that may be inconsistent with best science or broader conservation interests. The Committee of Scientists (1999)¹ recommended that —*planning must be based* on science and other knowledge of the world, including the use of scientifically based strategies for sustainability¹ (*emphasis added*). Additionally, science consistency reviews would aid responsible officials in ensuring that best science is used to address the impacts of stressors from incompatible multiple uses on wildlife viability, water quality, climate change vulnerability, landscape connectivity, and ecosystem protection and restoration.

The Forest Service should set the bar high on this standard and include a requirement that plans conform to best available science similar to the best available science requirement of the Endangered Species Act and other relevant statutes.²

2. Require Stronger Protections for Fish & Wildlife

The 1982 forest plan regulations required the Forest Service to maintain viable populations of native vertebrate species, and it stipulated that those populations be —*well distributed in the planning area*.³ In practice, this landmark requirement has instilled a science-based conservation rationale in agency decision making for decades, and it has focused agency attention on risks to local fish and wildlife populations. The draft planning rule departs from this longstanding commitment and presents an alternative approach that increases the risk of biodiversity loss. The final rule should:

A. *Ensure that ecosystem management actually results in measurable species diversity outcomes.*

The proposal's assertion that ecosystem diversity —*will provide the ecological conditions for the long-term persistence of the vast majority of species within the plan area and will maintain species diversity is spurious*. As the Committee of Scientists (1999) stated: —*Habitat alone cannot be used to predict wildlife populations*¹ and —*diversity is sustained only when individual species persist; the goals of ensuring viability and providing for diversity are inseparable*.¹ The proposal embraces a single proxy for estimating species diversity (habitat characteristics), one that has been roundly criticized in the scientific community. A rational fix would be to also employ the viability of focal species as a proxy measure to further validate coarse filter management actions at the species level. In the current proposal, focal species are not given a clear role in diversity planning and decision making.

¹ The Committee of Scientists was named by the Secretary of Agriculture on December 11, 1997, to provide technical and scientific advice on land and resource planning on the national forest and grasslands.

² The ESA is one of several federal statutes, including the Marine Mammal Protection Act, 16 U.S.C. §§ 1361-1431 (2000) and the Magnuson-Stevens Fishery Conservation & Management Act, 16 U.S.C. §§ 1801-1883 (2000), that requires federal agencies to use the best scientific and commercial data available when making decisions. The Clean Water Act (33 U.S.C. §§ 1251-1387) includes requirements to —*restore and maintain the chemical, physical and biological integrity of the Nation's waters*.¹

³ The 1982 regulations can be found online at <http://www.fs.fed.us/emc/nfma/includes/nfmareg.html>.

B. Reduce risks to conservation concern. The risks to species diversity presented by the coarse filter are compounded by the proposal’s treatment of species of conservation concern. Protective plan components for these species are not required until the responsible official determines —there is evidence demonstrating significant concern about its capability to persist over the long-term in the plan area.¶ This approach places the most vulnerable species at further risk by relinquishing the agency’s historical affirmative obligation to maintain viable populations and places that burden on sources outside of the agency. Given the weaknesses of the coarse filter, by the time a responsible official determines that there may be evidence of concern over a species’ persistence in the planning area, risks to consequential biodiversity loss could have greatly increased.

C. Strengthen the definition of a viable population. The proposed definition of a —viable population¶ may lead to management that poses considerable risks to species diversity and species of conservation concern. It could result in significant constrictions to a species’ range and even yield local extirpations. The new definition of viability replaces the standard of *well-distributed populations* with a vague concept that calls for a species to —persist over the long-term with *sufficient distribution* to be resilient and adaptable to stressors and likely future environments¶ (emphasis added). The ambiguity of the definition provides the agency with the discretion to determine what distribution is sufficient to meet the non-defined parameters of resilience and adaptability. The final rule should define population viability using acceptable scientific parameters (e.g., Noon et al. 2003, Noon et al. 2005, Noon et al. 2009).

D. Include formal mechanisms and standards for assessing and documenting the “inherent capability” of a forest. The proposed rule poses significant risks to biological diversity by premising protections on the —inherent capability of the land¶ to meet diversity requirements. While it is reasonable that the agency can’t be held accountable for factors outside of their control, it is unacceptable to allow the agency to determine when and how to make these determinations. The final rule must prescribe a science-based approach for assessing and documenting when outside factors prevent them from conserving species.

3. Require Identification and Protection of Watersheds and Drinking Water Areas

While watersheds vary across national forests in many respects, years of scientific study and management experience point to four globally consistent principles central to all effective forest planning for water resources. The final rule should:

A. Require identification and protection of default Riparian Conservation Areas. Numerous scientific studies from national forests and grasslands across the United States have identified as a minimum default area the land and vegetation 100 feet or wider on each side of permanent and ephemeral water bodies—streams, rivers, floodplains, lakes, wetlands, and estuaries—as proposed in Alternative D in the 2011 DEIS (e.g., Gregory et al. 1991, Castelle et al. 1994, Spence et al. 1995, Palone and Todd 1997, Fisher and Fischenich 2000, Wissmar 2004, Mayer et al. 2005, Reeves et al. 2006). These important buffer areas control natural hydrologic processes,

protect human infrastructure outside them and key wildlife habitat within them, and protect waters from delivery of sediment, nutrients, and other pollutants. The rule should clearly allow only management activities in Riparian Conservation Areas that maintain and restore this suite of natural functions and values.

B. Require the designation of a well-distributed, connected network of the highest-value Key Watersheds in each forest. This network should include watersheds that play an important role in community water supply (e.g., surface water supply areas) and the conservation of imperiled species (e.g., Sedell et al. 1990, FEMAT 1993, Frissell and Bayles 1996, DellaSala et al. in press). Within Key Watersheds, clear management direction should allow only those activities necessary to maintain and restore natural values and functions, including addressing point and non-point pollution sources (particularly roads and livestock grazing) in streams designated as —water quality limited under § 303(d) of the Clean Water Act.

C. Mandate the removal and remediation of forest roads as the top active restoration priority throughout the National Forest System, with special emphasis in Key Watersheds and Riparian Conservation Areas. Forest roads are the most pervasive and treatable cause of harm to aquatic resources (Trombulak and Frissell 2000, Gucinski et al. 2001).

D. Require adoption of measurable, enforceable standards for water and watershed protection. Measurable standards—physical, chemical, and biological—are necessary due to the complex, cumulative, and often uncertain relationships among specific human practices and natural causes of harm or of recovery (Montgomery 1995). Such standards are common in other environmental regulatory areas, like controlling water pollution, and ultimately facilitate adaptive management and collaborative decision making by providing directions, goals, sideboards, and certainty for later decisions (Nie 2010). Monitoring should tie aquatic biodiversity indicators to specific management activities in order to limit impacts from multiple uses (Karr and Chu 1999).

4. Require Protection of Late Successional and Old-growth Forests

Old forests have declined to a fraction of their original extent and have been highly fragmented by roads, clearcuts, and development (Heilman et al. 2003). The draft planning rule includes provisions for —harvesting of trees on land not suitable for timber production (§219.11(3)), but it does not do so in a manner that would conserve old forests. Old forests support high levels of fish and wildlife diversity, are essential to maintenance of hydrological processes, and perform many other ecosystem services that have been reduced or are absent from intensively managed forests (Lindenmayer and Franklin 2002, Strittholt et al. 2006, DellaSala 2011). In particular, carbon stored in coastal rainforests in the Pacific Northwest and Alaska has been recognized as being globally significant (Smithwick et al. 2002, Luysaert et al. 2008). While the draft planning rule requires monitoring carbon stored in above-ground vegetation (§ 219.12(4)(vi)), forest plans are not required to maintain carbon-dense ecosystems. We urge the Forest Service to include a standard for not only monitoring but also protecting ecosystems with significant carbon stores by removing them from the available timber base.

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