

- AMERICAN BIRD CONSERVANCY • AMIGOS BRAVOS •
- ARIZONA WILDERNESS COALITION • ARIZONA ZOOLOGICAL SOCIETY •
- BARK • BEAR RIVER WATERSHED COUNCIL • BIODIVERSITY CONSERVATION ALLIANCE •
- CALIFORNIA WILDERNESS COALITION • CALIFORNIANS FOR WESTERN WILDERNESS •
- CENTER FOR BIOLOGICAL DIVERSITY • CENTER FOR NATIVE ECOSYSTEMS •
- CENTER FOR SIERRA NEVADA CONSERVATION •
- CENTRAL SIERRA ENVIRONMENTAL RESOURCE CENTER • CHATTOOGA CONSERVANCY •
- CHEROKEE FOREST VOICES • COLORADO ENVIRONMENTAL COALITION •
- COLORADO MOUNTAIN CLUB • COLORADO WILD • CONSERVATION NORTHWEST •
- DEFENDERS OF WILDLIFE • EARTHJUSTICE • ENVIRONMENT AMERICA •
- ENVIRONMENTAL PROTECTION INFORMATION CENTER • FOREST ISSUES GROUP •
- FRIENDS OF BLACKWATER • FRIENDS OF THE CLEARWATER •
- FRIENDS OF THE KALMIOPSIS • GEORGIA FOREST WATCH •
- GIFFORD PINCHOT TASK FORCE • GRAND CANYON TRUST •
- GRAND CANYON WILDLANDS COUNCIL •
- GREAT OLD BROADS FOR WILDERNESS • GREATER YELLOWSTONE COALITION •
- GREEN BERKSHIRES INC • HELLS CANYON PRESERVATION COUNCIL •
- HIGH COUNTRY CITIZENS' ALLIANCE • IDAHO CONSERVATION LEAGUE •
- INDUSTRIAL WIND ACTION GROUP • JACKSON HOLE CONSERVATION ALLIANCE •
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- KLAMATH-SISKIYOU WILDLANDS CENTER •
- KOOTENAI ENVIRONMENTAL ALLIANCE • LOS PADRES FORESTWATCH •
- MOUNT SHASTA BIOREGIONAL ECOLOGY CENTER •
- NATIONAL CENTER FOR CONSERVATION SCIENCE AND POLICY •
- NATIONAL PARKS CONSERVATION ASSOCIATION •
- NATURAL RESOURCES DEFENSE COUNCIL •
- NEW MEXICO WILDERNESS ALLIANCE • NORTHCOAST ENVIRONMENTAL CENTER •
- OLYMPIC FOREST COALITION • OREGON NATURAL DESERT ASSOCIATION •
- OREGON WILD • PACIFIC RIVERS COUNCIL • PEW ENVIRONMENT GROUP •
- PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY •
- QUIET USE COALITION • RESTORE: THE NORTH WOODS •
- ROCKY MOUNTAIN RECREATION INITIATIVE • ROGUE VALLEY AUDUBON SOCIETY •
- SAN LUIS VALLEY ECOSYSTEM COUNCIL • SAFE: SAVE OUR ANCIENT FOREST ECOLOGY •
- SELKIRK CONSERVATION ALLIANCE • SHEEP MOUNTAIN ALLIANCE • SIERRA CLUB •
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- SKY ISLAND ALLIANCE • SODA MOUNTAIN WILDERNESS COUNCIL •
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- TONGASS CONSERVATION SOCIETY • UMPQUA WATERSHEDS INC •
- UPPER GILA WATERSHED ALLIANCE • VIRGINIA FOREST WATCH •
- VIRGINIA WILDERNESS COMMITTEE • VOICES FOR PUBLIC LANDS •
- WASHINGTON WILDERNESS COALITION • WEST VIRGINIA HIGHLANDS CONSERVANCY •
- WEST VIRGINIA WILDERNESS COALITION • WESTERN LANDS PROJECT •
- WESTERN NORTH CAROLINA ALLIANCE • WESTERN WATERSHEDS PROJECT •
- WHITE MOUNTAIN CONSERVATION LEAGUE • WILD SOUTH • WILD UTAH PROJECT •
- WILD VIRGINIA • WILD WILDERNESS • WILDEARTH GUARDIANS •
- WILDERNESS WORKSHOP • WILDLANDS CPR • WILDLAW •
- WILDWEST INSTITUTE • WYOMING OUTDOOR COUNCIL •
- WYOMING WILDERNESS ASSOCIATION • XERCES SOCIETY •

December 16, 2009

The Honorable Thomas J. Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Subject: New NFMA Planning Rulemaking Process

Dear Mr. Secretary:

On behalf of more than 100 organizations and our millions of members, we write to express our strong and continued support for effective science-based management of our National Forests. We are encouraged that this administration is committed to improving forest planning and ensuring that science is an integral part of agency decision-making. Accordingly, we urge you to establish a Committee of Scientists to inform any updating of the national forest planning rules.

We appreciate the direction that you have already provided to the Forest Service regarding development of forest planning rules. In your August 14th speech in Seattle, you stated:

*The Forest Service planning process provides an important venue to integrate forest restoration, climate resilience, watershed protection, wildlife conservation, the need for vibrant local economies, and collaboration into how we manage our National Forests. Our best opportunity to accomplish this is in developing a new forest planning rule for our National Forests.... I have asked Chief Tidwell to develop a new planning rule to ensure management and restoration of our National Forests with a goal to protect our water, climate and wildlife while creating local economic opportunity.*¹

We also strongly support the direction President Obama set early in his administration regarding the important role of science in guiding agency policy-making, in which he stated:

*Science and the scientific process must inform and guide decisions of my Administration on a wide range of issues, including improvement of public health, protection of the environment, increased efficiency in the use of energy and other resources, mitigation of the threat of climate change, and protection of national security. The public must be able to trust the science and scientific process informing public policy decisions.*²

We believe that the best way to inform any forest plan rulemaking process is through a Committee of Scientists, as provided by the National Forest Management Act (NFMA).³ Well-structured scientific

¹ Prepared remarks of Secretary Tom Vilsack, Seattle, Washington, August 14, p. 6,
<http://www.fs.fed.us/video/tidwell/vilsack.pdf>

² Presidential Memorandum on Scientific Integrity for the Heads of Executive Departments and Agencies, March 9, 2009, http://www.whitehouse.gov/the_press_office/Memorandum-for-the-Heads-of-Executive-Departments-and-Agencies-3-9-09

³ 16 U.S.C. § 1604(h)

input is necessary to address environmental challenges and critical issues affecting our national forests, including climate change, ecosystem restoration, ecological services, and wildlife viability. Furthermore, a Committee of Scientists, coupled with a robust National Environmental Policy Act public involvement process, would significantly help as you pursue a scientifically sound, and legally defensible forest planning rule. In drafting the NFMA, Congress correctly perceived that an expert committee of natural resource scientists representing diverse disciplines is key to ensuring a well-informed rulemaking process that results in a scientifically sound, practical, and lasting forest planning rule.

We would also note that the Bush administration failed twice to produce legally and scientifically sound NFMA regulations. The 2005 and 2008 regulations remain the only planning regulations in history that did not seek the advice of a Committee of Scientists as provided for in NFMA. Instead the Bush administration sought to short-circuit consideration of wildlife and biological diversity by holding a “workshop”. Their fundamentally flawed process resulted in an almost entirely standard-less approach to national forest planning that was controversial from start to finish. Not coincidentally, both the 2005 and 2008 regulations were struck down by federal courts.

Establishing a Committee of Scientists to assist in any significant changes to the forest planning rule is a better course. We look forward to working with you as you pursue scientifically sound, legally defensible and durable forest planning regulations that will help guide the management of our National Forests as they take on the unprecedented challenge of climate change while ensuring the protection of the watersheds and wildlife on which so many Americans depend. Thank you for your consideration and attention to this important matter.

Sincerely,

George Fenwick
President
American Bird Conservancy

Erik Molvar
Executive Director and Wildlife Biologist
Biodiversity Conservation Alliance

Brian Shields
Executive Director
Amigos Bravos

Ryan Henson
Senior Conservation Director
California Wilderness Coalition

Kevin Gaither-Banchoff
Executive Director
Arizona Wilderness Coalition

Michael J. Painter
Coordinator
Californians for Western Wilderness

Jeff Williamson
President
Arizona Zoological Society

Kieran Suckling
Executive Director
Center for Biological Diversity

Alex P. Brown
Executive Director
Bark

Josh Pollock
Conservation Director
Center for Native Ecosystems

Dan Miller
Executive Director
Bear River Watershed Council

Karen Schambach
President
Center for Sierra Nevada Conservation

John Buckley
Executive Director
Central Sierra Environmental Resource Center

Nicole Hayler
Program Coordinator
Chattooga Conservancy

Catherine Murray
Executive Director
Cherokee Forest Voices

Elise Jones
Executive Director
Colorado Environmental Coalition

Katie Blackett
Chief Executive Officer
Colorado Mountain Club

Ryan Demmy Bidwell
Executive Director
Colorado Wild

Dave Wertz
Science and Conservation Director
Conservation Northwest

Barbara Ullian
Coordinator
Friends of the Kalmiopsis

Wayne Jenkins
Executive Director
Georgia ForestWatch

Emily Platt
Executive Director
Gifford Pinchot Task Force

Bill Hedden
Executive Director
Grand Canyon Trust

Kelly Burke
Executive Director
Grand Canyon Wildlands Council

Rodger Schlickeisen
President and CEO
Defenders of Wildlife

Trip Van Noppen
President
Earthjustice

Alison Adams
Preservation Associate
Environment America

Scott Greacen
Executive Director
Environmental Protection Information Center

Barbara Rivenes
President
Forest Issues Group

Judith Rodd
Director
Friends of Blackwater

Gary Macfarlane
Ecosystem Defense Director
Friends of the Clearwater

Veronica Egan
Executive Director
Great Old Broads for Wilderness

Mike Clark
Executive Director
Greater Yellowstone Coalition

Eleanor Tillinghast
President
Green Berkshires, Inc.

Greg Dyson
Executive Director
Hells Canyon Preservation Council

Dan Morse
Executive Director
High Country Citizens' Alliance

Rick Johnson
Executive Director
Idaho Conservation League

Lisa Linowes
Executive Director
Industrial Wind Action Group

Louise Lasley
Public Lands Director
Jackson Hole Conservation Alliance

Jim Scheff
Director
Kentucky Heartwood

Kimberly Baker
Forest and Wildlife Protection Coordinator
Klamath Forest Alliance

Stephanie Tidwell
Executive Director
Klamath-Siskiyou Wildlands Center

Terry J. Harris
Executive Director
Kootenai Environmental Alliance

Jeff Kuyper
Executive Director
Los Padres ForestWatch

Michelle Berditshevsky
Director
Mount Shasta Bioregional Ecology Center

Dominick DellaSala
President and Chief Scientist
National Center for Conservation Science &
Policy

Thomas C. Kiernan
President
National Parks Conservation Association

Frances Beinecke
President
Natural Resources Defense Council

Nathan Newcomer
Associate Director
New Mexico Wilderness Alliance

Scott Greacen
Conservation Committee Chair
Northcoast Environmental Center

Bonnie Phillips
Executive Director
Olympic Forest Coalition

Brent Fenty
Executive Director
Oregon Natural Desert Association

Steve Pedery
Conservation Director
Oregon Wild

Christopher A. Frissell, Ph.D.
Director of Science and Conservation
Pacific Rivers Council

Joshua Reichert, Ph.D.
Managing Director
Pew Environment Group

Jeff Ruch
Executive Director
Public Employees for Environmental
Responsibility (PEER)

Tom Sobal
Coordinator
Quiet Use Coalition

Mike Kellett
Executive director
RESTORE: The North Woods

Rosalind McClellan
Director
Rocky Mountain Recreation Initiative

Alex Maksymowicz
President
Rogue Valley Audubon Society

Christine Canaly
Director
San Luis Valley Ecosystem Council

Rob Schaeffer, Ph. D
Director
SAFE: Save Our Ancient Forest Ecology

Mark Sprengel
Executive Director
Selkirk Conservation Alliance

Hilary White
Director
Sheep Mountain Alliance

Carl Pope
Executive Director
Sierra Club

Don Rivenes
Conservation Chair
Sierra Foothills Audubon Society

Craig Thomas
Executive Director
Sierra Forest Legacy

Shane Jimerfield
Executive Director
Siskiyou Project

Melanie Emerson
Executive Director
Sky Island Alliance

Dave Willis
Coordinator
Soda Mountain Wilderness Council

Mark Shelley
Director
Southern Appalachian Forest Coalition

Sarah A. Francisco
Senior Attorney
Southern Environmental Law Center

Gloria Flora
Executive Director
Sustainable Obtainable Solutions

Janice Bezanson
Executive Director
Texas Conservation Alliance

Steve Brooks
Director
The Clinch Coalition

Mike Petersen
Executive Director
The Lands Council

William H. Meadows
President
The Wilderness Society

Carol Cairnes
President
Tongass Conservation Society

Ken Carloni
President
Umpqua Watersheds, Inc.

Donna Stevens
Executive Director
Upper Gila Watershed Alliance

Bud Watson
Executive Director
Virginia Forest Watch

Laura Neale
President
Virginia Wilderness Committee

Scott Silver
Representative
Voices for Public Lands

Terry Fernsler
Executive Director
Washington Wilderness Coalition

Hugh Rogers
President
West Virginia Highlands Conservancy

Scott Silver
Executive Director
Wild Wilderness

Mike Costello
Campaign Coordinator
West Virginia Wilderness Coalition

Bryan Bird
Wild Places Program Director
WildEarth Guardians

Janine Blaeloch
Director
Western Lands Project

Peter Hart
Conservation Analyst/Staff Attorney
Wilderness Workshop

Julie V. Mayfield
Executor Director
Western North Carolina Alliance

Bethanie Walder
Executive Director
Wildlands CPR

Jonathan B. Ratner
Director
Western Watersheds Project

Ray Vaughan
Executive Director
WildLaw

Dave Holaway
President
White Mountain Conservation League

Matthew Koehler
Executive Director
WildWest Institute

Tracy Davids
Executive Director
Wild South

Laurie K. Milford
Executive Director
Wyoming Outdoor Council

James Catlin, PhD
Project Coordinator
Wild Utah Project

Liz Howell
Executive Director
Wyoming Wilderness Association

David Hannah
Conservation Director
Wild Virginia

Scott Hoffman Black
Executive Director
Xerces Society for Invertebrate Conservation

cc: Director John Holdren, Office of Science and Technology Policy
Undersecretary Harris Sherman, US Department of Agriculture
Deputy Undersecretary Jay Jensen, US Department of Agriculture
Chief Tom Tidwell, USDA Forest Service