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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.

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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,

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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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