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Forest Issues
Group



CALIFORNIA
NATIVE PLANT
SOCIETY

May 27, 2015



Al Olson
Director Ecosystem Planning
USDA Forest Service
Pacific Southwest Region
1323 Club Drive
Vallejo, CA 94592

Re: Recommendations related to forest plan revision process on national forests in California

Dear Al:

A group of us met recently to talk about our experiences to date with the forest plan revision effort underway on the Inyo, Sequoia and Sierra national forests. As a result of this meeting, we offer the following suggestions in an effort to build on our experiences and improve future forest plan revision efforts. The suggestions below are organized into some general recommendations in the body of this letter and more detailed suggestions in Attachment A.

Timing and sequencing for the next forest plans

We are aware that you and staff from Region 6 are creating a plan to address completion of the next forest plans in California and states to the north. We discussed at our meeting a schedule for these next forest plans that would allow our organizations and supporters effectively to participate in the revision process for multiple forests. Some of our organizations expect to be involved in revision efforts outside of the Sierra Nevada and we included reference to these forests because of this. The schedule below was developed based on the following considerations:

- Maintaining momentum from recently initiated forest planning in the Sierra Nevada bioregion
- Grouping forests that have some geographical and ecological similarity
- Sequencing forests to distribute work load in time

National Forest	2016	2017	2018	2019	2020	2021	2022
Tahoe National Forest	X	X	X				
Eldorado National Forest	X	X	X				
Stanislaus National Forest	X	X	X				
Lassen National Forest			X	X	X		
Plumas National Forest			X	X	X		
Modoc National Forest			X	X	X		
NWFP forests in California					X	X	X

With respect to the grouping of the forests, we felt that the TNF, ENF and STF were quite similar geographically and ecologically and best handled together. This would allow for agency staff to support each other across forest boundaries. We grouped the LNF, PNF and MNF together even though there is less similarity among these forests. There was fairly strong agreement that the LNF and PNF should be handled together since they share many ecological issues, e.g., spotted owl conservation, fire-dependent ecosystems, American marten, meadow and riparian conditions. The MNF has some similarity to the northern and eastern portions of the LNF, but quite a few habitat types that are unlike any on either the LNF or PNF. That said, the inclusion of the MNF with the NWFP forest made less geographical or ecological sense to us as any other grouping. We were somewhat unresolved about this though.

Three year time frame for completing a revision

The schedule above utilizes a three year time frame for developing a forest plan because we understand this to be one premise you have adopted in in your evaluation of how to complete the remaining revisions in California. We do not endorse this three year time frame though since we believe that it is most important to complete a revision process that is effective, appropriately addresses critical resources, and efficiently uses budget and technical capacity. Our experience is that timelines that are too short can result in work that is incomplete or of poor quality and that must be revised. Ultimately, this results in an extension of the timeline and often dissatisfaction from the agency and stakeholders with the process. We encourage you not to adopt timelines that are overly ambitious. We are fully supportive of using time and resources efficiently to complete high quality work.

We believe the suggestions we offer in Attachment A related to integration of training of agency staff about the 2012 rule, the development of guidance of specific aspects of the planning process, and better integration of the planning steps would make the process more efficient and effective. We also suggest that teams at the regional and forest level be more clearly defined before the revision process is initiated for a forest. This will help both stakeholders and agency personnel understand who is working on the specific aspects of the plan. It will also help to identify where there are gaps in technical capacity.

We look forward to working with Region 5 to revise the remaining forest plans in California. If you have questions or would like to discuss any of these ideas further, please contact Sue Britting (britting@earthlink.net; 530-295-8210).

Thank you for your consideration of our comments.

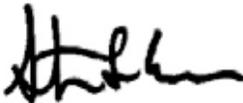
Sincerely,



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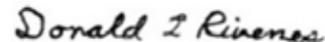


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Attachment A: Additional Recommendations for Forest Plan Revision (FPR) Process

Process step	Recommendations for northern Sierra Nevada and Northwest Forest Plan NFs
Public Engagement	
Use of Sierra Cascades Dialogue (SCD) for engagement	<p>Need long-term vision for sequencing of topics for the work at SCD to be relevant and integrated with the revision timeline</p> <p>Need a better explanation or demonstration from the Forest Service as to how feedback from SCD informs FPR process</p> <p>Review/evaluate past SCDs to ensure they delivered as expected and will provide what's needed for future FPRs</p> <p>Need a better explanation of important steps in process and key plan components for FPRs so that participants (including Forest Service staff) fully understand the process, e.g., desired conditions were hard for some public members to comprehend in order to be effective/helpful in the meetings</p>
Our Forest Place – wiki, blog and other aspects	<p>Focus on one type of platform; we prefer the wiki and not other aspects of Our Forest Place (much information to be gained by crowdsourcing)</p> <p>Set rules for engagement that are clear and be clear about how the site is refereed</p> <p>Have clear statements of purpose and structure</p>
Education on new FPR process (under 2012 rule)	<p>Important to hold trainings for Forest Service staff to ensure they are knowledgeable about the process</p> <p>Develop a schematic/flow chart on how the whole process works stating clearly how the Science Synthesis and current condition and assessments provide the foundation for monitoring and NEPA and lead to framing the need to change, and developing desired conditions and other plan components. The existing schematics fail to reflect how the FPR process needs to be integrated from day one.</p>
Forest Service hosted workshops	<p>Need to improve facilitation and ensure that facilitators are well informed about the process and social/cultural influences</p> <p>The agency needs to do a better job explaining the overall arc of forest planning, the questions posed to the public and information needed at each stage of the process, and how one stage leads to another.</p> <p>Presentations followed by small group discussions seem to work better</p> <p>Different rooms for breakouts very helpful in managing the flow of people</p> <p>Have specialists for the specific topic area take notes for breakouts (having someone unfamiliar with the topic are results in poor quality of note taking and time delays making sure the note taker has captured the information correctly)</p>
Assessment	
Science synthesis (SS) for Sierra Nevada and Southern Cascades	<p>The SS reflects information reviewed through 2012. It is important to establish a technical panel to review information since 2012 that is relevant to FPR. This could be accomplished with a small panel of scientists using an annotated bibliography format. Authors of respective chapters could be asked if the new information changes their recommendations in substantive ways.</p>

Attachment A: Additional Recommendations for Forest Plan Revision (FPR) Process

Process step	Recommendations for northern Sierra Nevada and Northwest Forest Plan NFs
Bioregional assessment	<p>Convene a panel to review/update Bioregional Assessment and especially address information that we were told would be in the Forest Assessments but in the end was not, e.g., comprehensive trend and habitat information for species of federally listed species and species of conservation concern, meadow and riparian systems.</p> <p>This assessment helps to maintain integrity of regional, overarching conservation/species issues and should be retained and updated.</p>
Forest assessment	<p>Allow for sufficient time to prepare assessments; develop information to support assessment in advance of initiating FPR process if possible and if information will not become dated</p> <p>Agency staff working on forest assessment should be well informed about how the 2012 planning rule functions</p> <p>Should be focused on substantive provisions of planning rule to inform monitoring and need for change and subsequent development of other plan components</p> <p>Should provide the basis for the affected environment portion of the NEPA document for the FPR</p>
Wilderness inventory and evaluation	<p>Sequencing: Complete inventory early and evaluation of potential areas prior to alternative formulation</p> <p>Invite public feedback at each step in the 4-step process and prior to finalizing that step</p> <p>Provide methods and approach in advance of issuing results or at the same time so public can understand the assumptions used in the analysis as results are being reviewed.</p> <p>Affirm existing Wilderness recommendations on Forests where previous forest plans have recommended Wilderness</p>
Wild and Scenic Rivers evaluation and planning	<p>Affirm existing suitability recommendations on Forests where comprehensive inventories and evaluations were completed in the original FPs</p> <p>For Forests lacking a comprehensive inventory and evaluation, complete the inventory and evaluate eligible rivers for suitability prior to alternative formulation</p> <p>Seek public feedback at each step in the process and prior to finalizing that step</p> <p>Provide justification for not completing the suitability evaluation other than its not required in the Forest Planning Rule</p> <p>Determine whether changed circumstances warrant updating existing Comprehensive River Management Plans (CRMPs)</p> <p>For designated rivers without CRMPs, determine the need for preparing a CRMP to ensure protection of free flowing character and outstanding values</p>
Plan design and components	
Integrating Travel Management in FPR	<p>The Travel Analysis Report should inform the statement of “need to change” and development of plan components that guide identification and implementation of a minimum road system.</p> <p>The road system is a major issue that must be addressed in the land management plan revision</p> <p>To the extent the FPR makes over-snow vehicle (subpart C) use designations</p>

Attachment A: Additional Recommendations for Forest Plan Revision (FPR) Process

Process step	Recommendations for northern Sierra Nevada and Northwest Forest Plan NFs
	(through recreational opportunity spectrum or otherwise), must apply the executive order minimization criteria
Need for change	<p>The Agency needs to do a much better job of explaining the arc of the forest planning process in non-jargon-laden language; the process has been difficult to understand and seemingly disjointed from one stage to another</p> <p>Should be informed by the forest assessments and public review</p> <p>Disclose methodology for the evaluation in advance of releasing the results (or at a minimum at the same time)</p> <p>Ensure that the assessment asks and answers the right questions to inform need for change (and subsequent plan components)</p>
Desired conditions and other plan components	<p>These should reflect substantive requirements of planning rule (i.e., ecosystem integrity, ecological and fiscal sustainability, diversity, etc.) and have enforceable standards to achieve those substantive requirements.</p> <p>Developing a toolbox of example plan components, relevant to our bioregions, that would achieve those requirements for issues like infrastructure, designated areas, species management, etc.</p>
Scoping	<p>Clearly link the purpose and need statement to “need for change” and forest assessment</p> <p>If scope is limited by the agency, doing so should be supported by status and trend information in forest assessments that demonstrate ecosystem integrity and other requirements of the planning rule will be met under the status quo</p>
Monitoring plan	<p>The information presented in the forest assessments should provide the foundation for the questions to be addressed and evaluated in the monitoring plan</p> <p>The development of the monitoring plan should begin with and be coordinated with the forest assessments</p>
Developing alternatives	<p>This process should be more interactive with opportunities for public review of draft alternatives prior to the release of the DEIS</p> <p>Post a public review draft of the alternatives 3-4 months prior to release of the DEIS (This is a common approach used in the development of county general plans.)</p>