



## Sierra Forest Legacy

Protecting Sierra Nevada Forests and Communities



March 13, 2014

Dear Supervisors Gould, Elliot, and Armenta:

Thank you for offering your insights and listening to the concerns of the public at the Federal Advisory Committee meeting in Sacramento last week. As stakeholders and managers of early adopter forests, part of our role is to evaluate the implementation of the new planning rule and identify problems and solutions. At the meeting, it was clear from the stakeholders in attendance that there is wide agreement that the planning timeline for the three forests is too aggressive and ought to be reconsidered in order to address deficiencies in the products produced to date and prevent future problems.

After the timeline discussion, several Forest Service employees approached us to ask “How much more time do you need? Is 60 days enough? 90 days?” These questions miss the point. The timeline should be extended not for *us*, but so that *the agency* has the time to meet the obligations of the forest planning regulations and create a solid foundation of science- and policy-based standards and guidelines to help manage public forests over the next twenty years. We offer the attached timeline as an example and would like to talk more with you about implementing this time line for your forests.

Of course, every planning effort involves a tradeoff between quality and timeliness, and we never know exactly what problems could arise, in theory, in the process. We, however, have identified three *actual* deficiencies that demonstrate how the current timeline is not working right now. To ignore these problems because of a rushed timeline would be month-wise and year-foolish.

1. The travel analysis processes and resulting reports are not being used to inform forest planning. Although the draft planning handbook directives (as amended by the FACA committee recommendations) outline how the recommendations from travel analyses should be incorporated into roadless inventory and wilderness evaluation—and these travel reports are due to be completed, 13 years after the regulation requiring them was promulgated, in the next couple of months—they will not be used under the current timeline if the Forest Service fails to stretch the timeline.

2. The “Need to Change” statement does not provide a link between current trends and conditions, future desired conditions, and what we need to change to get us there. We have heard from Forest Service staff that there was no systematic or transparent methodology for determining the need to change because there was not sufficient time to do so.

3. The scope of the thematic issues is too narrow. For example, the major themes discussed in the need to change statement do not include management and monitoring of species of conservation concern or opportunities for conservation designations.

We urge you to take the necessary amount of time to resolve these specific deficiencies. You have support from the public to do so, and it likely may save you time in the long run. As always, we stand ready to work with you and your staff and offer assistance in any way we can. Thanks to you and your staff for your hard work and dedication.

Sincerely,



Regional Conservation Representative  
The Wilderness Society  
250 Montgomery Street, Suite 250  
San Francisco, CA 94104



Susan Britting, Ph.D.  
Executive Director  
Sierra Forest Legacy  
PO Box 377  
Coloma, CA 95613

CC: Deborah Whitall, Acting Ecosystem Planning Director

**Timeline Proposed by Environmental Coalition for  
Region 5 Early Adopter Forest Plan Revision Process**

(Adapted from the Nez Perce-Clearwater Forest;

[http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5447510.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5447510.pdf))

<b>Pre-NEPA</b>	<b>Timeline</b>	<b>Continued Collaboration/Public Participation</b>
Preliminary Need for Change Analysis	60 days beginning March 2014	Expand Need for Change Analysis to include all 15 Topic Areas as identified in the Planning Rule (§ 219.6). Develop desired conditions.
Public Workshops	May 2014	Accept input on Preliminary Need for Change Analysis and desired conditions.
<b>NEPA</b>	<b>Timeline</b>	<b>Continued Collaboration/Public Participation</b>
Distribute Proposed Action for Formal Comment (Scoping Begins)	60 days beginning June 2014	Release of a preliminary proposed action. Accept public input to help determine key issues, emphasis areas and alternatives.
Public Workshops	June 2014	Check-in meetings to share information on proposed plan and review requirements for substantive comments.
Formal Scoping Ends	August 2014	Comments are analyzed and summarized; key issues and emphasis areas are identified. Comment content summaries will be published to the Forests' website for public review.
Share Draft Alternatives	October 2014	Draft alternatives will be published to the Forests' website for public review. Collaborative meetings for interested parties to provide feedback.
IDT Conducts Effects Analysis and Develops Draft Monitoring Plan	November 2014 through May 2015	Updates on progress and new information (if discovered) will be provided to interested parties through Forests' website.
Share Draft Monitoring Plan	February 2015	Draft monitoring plan will be published to the Forests' website for public review. Collaborative meetings will be scheduled for interested parties to provide feedback.
Distribute DEIS for Public Review and Formal Comment	90 days beginning in June 2015	This is an approximate date. Depending on key issues, emphasis areas, and number of alternatives, DEIS may be available at an earlier date.
Public Workshops	June 2015	Public workshops to share information on the DEIS and review requirements for substantive comments.
Formal DEIS Comment Period Ends	September 2015	Comments are analyzed and summarized. Resource specialists respond to comments and provide additional analysis or clarification and needed.
IDT Prepares FEIS and Responsible Official Prepares Draft ROD	October 2015 through February 2016	Updates on progress and new information (if discovered) will be provided to interested parties through Forests' websites.
Distribute FEIS and Draft ROD and Begin Pre-decisional Review (i.e., Objection Project	60 days beginning in March 2016	This is an approximate date. Depending on comments received for the DEIS, the FEIS and draft ROD may be available at an earlier date.
Public Workshops	March 2016	Share information in the draft decision, answer questions, discuss adaptive management.
Issue Final Decision	September 2016	This is an approximation dependent on the date pre-decisional review begins.