

May 15, 2011

Forest Service Planning Draft Environmental Impact Statement
C/O Bear West Company
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Submitted via <http://www.govcomments.com/>

The Northern California Society of American Foresters (NCSAF) would like to submit the following comments on the USDA Forest Service's proposed Planning Rule (PR). We are a state division of the Society of American Foresters, the national scientific and educational organization representing the forestry profession in the United States, and including over 14,000 professional foresters nationwide.

For our comments, we will concentrate on sustainable forests and sustainable communities.

Sustainable Forests

Healthy, sustainable forests are a cornerstone of the Forest Service's mission and its very existence. The appropriate uses of National Forest system lands were outlined by Gifford Pinchot in 1907 and no legislation has repealed that direction. Yet this PR seems to ignore the role that active management plays in sustaining the health of our forests and does not even mention the term *silviculture*. As has been seen in a number of western states, when sound forest management is excluded from the forests there are few options available when a natural disaster such as insect or disease outbreak, or catastrophic wildfire occur. Even more problematic is the loss of forested habitat related to a lack of reforestation after those events. It has been suggested in reports that the National Forests may become a net emitter of carbon if current management trends continue.

The PR states that the major goals of Forest Service planning include watershed and ecosystem restoration, providing suitable habitat for species of concern, enhancing forest resilience, and supporting vibrant rural communities; yet it ignores the need for sound forest management, including silvicultural practices, in order to attain these goals along with all the other uses of the forests. Long gone are the days when forested landscapes could be maintained with little or no active management. National Forest policies on fire suppression have helped lead to drastically changed habitats that are, in large part, no longer capable of withstanding major disturbance events. In order to maintain the functionality of these forest ecosystems, periodic treatments are necessary. Society is no longer willing to accept the consequences of natural (i.e. uncontrolled) processes, especially with the increased populations and property values in the wildland/urban interface. Therefore, human management activities are required to maintain the health and viability of our forests. The statement on page 65 of the draft environmental impact statement (DEIS) that a "restored ecosystem should be able to sustain itself overtime with minimal intervention" is the type of misconception that can lead forest managers and the public to take unwarranted risks that could lead to dire, and possibly fatal consequences. The PR needs to acknowledge that active management is not only appropriate, but desirable for the benefit of both society and the ecosystems on which society depends.

A major cornerstone of all third-party forest certification is sustainable management. Increasingly, forest landowners are encouraged to follow best management practices that recognize the importance of healthy forests and the risks of over-exploitation. We are not suggesting that the National Forest System seek third-party certification, but do urge the Forest Service to commit to the goals of sustainable management in this PR.

Page 8491 of the Federal Register indicates that the “proposed rule considers the ecological, social, and economic systems as interdependent systems, which cannot be ranked in order of importance”, however, it does not follow through with that commitment. It states that “the Agency has more influence over factors that impact ecological sustainability on National Forest Systems lands than it does for social and economic sustainability...” While this may sometimes be true, the National Forests certainly have a large and direct effect on local economies and their sustainability. The cumulative effect on neighboring communities and resources that result from decisions on National Forest System management can be very significant and must be more thoroughly addressed in the PR.

Sustainable Rural Communities and National Forest Partners

Agriculture Secretary Tom Vilsack stated in his vision for the Forest Service that “We must work towards a shared vision—a vision that conserves our forests and the vital resources important to our survival while wisely respecting the need for a forest economy that creates jobs and vibrant rural communities.” In quoting this statement, the Federal Register acknowledges that the contributions of the National Forests to the well being of those rural communities within and dependent upon the public forests are of high importance. However, the PR fails to follow up on Secretary Vilsack’s vision – the PR needs to include commitments to goals that promote local jobs and community stability. The PR needs to be amended to expand the list of linked resource management considerations in Section 219(a) to require opportunities to improve the socio-economic condition of dependent rural communities.

The groups that the Forest Service relies on to meet its mission, including not-for-profit and for-profit entities, must have a reliable commitment from the agency in order to justify their investments including personnel hiring, equipment purchases, and supply agreements. Past PRs have required that forest plans include a component specifying allowable harvest levels and a schedule of harvesting activities. Unfortunately, this PR eliminates these plan components instead making them part of the Forest Service’s Directive system. While many forests have failed to meet their forest plan commitments, removing these directives nearly eliminates the Forests’ accountability for their impacts to the socio-economic well being of associated rural communities. It is extremely disappointing that Section 219.11, *Timber requirements based on the NFMA*, not only does not require the Agency to supply timber or biomass for renewable energy, but actually limits or prohibits timber sales. This section should specifically acknowledge the benefits of silvicultural treatments in accomplishing ecosystem restoration.

The Forest Service needs to use this PR as a tool to adopt Secretary Vilsack's vision for sustainable forests and their interconnected communities. Declines in Forest Service outputs, other than firefighter pay, have led to a loss of infrastructure and knowledge which will be difficult to regain. The resulting degradation in the health and vitality of the National Forests and their rural communities is nearing a tipping point from which recovery may not be possible. Without the infrastructure to handle forest products and ecosystem services, it will be problematic for the Agency to attain non-commodity services such as watershed and ecosystem restoration, reforestation, and community stability. However, the PR is silent on this issue. The PR needs to include direction to take advantage of the opportunities that still exist to work with partners and communities to address and promote a healthy forest ecosystem, before these opportunities are lost.

In the recent past many, if not most, western communities have completely lost their wood products manufacturing capability due to major reductions in timber harvesting on public lands. Those communities that still have capacity are reaching a point where those facilities may also disappear. Once these facilities are gone, enticing another entity to make the level of investment necessary to rebuild the infrastructure is likely to be difficult at best. Many rural communities are likely to fail if there is no change in Forest Service direction. Ecotourism and small businesses rarely provide living wage employment for significant numbers of families. If the National Forests are unwilling to supply an adequate level of goods and services to meet public and resource management needs, the public through their members of congress may rightly question the need to continue having a separate Forest Service.

Thank you for considering these comments, and we urge you to make the necessary changes to remedy these significant flaws in the proposed rule.

Sincerely,

Ken Nolte, Chair
Northern California Society of American Foresters