

August 25, 2009

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

Tom Tidwell
Chief of the Forest Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

RE: Forest Service Planning Regulations

Dear Secretary Vilsack and Chief Tidwell:

The groups below represent millions of hunters, anglers, fish and wildlife professionals, and outdoor enthusiasts. We congratulate you both on your appointments as Secretary of Agriculture and Chief of the Forest Service, respectively, and look forward to working with you both to provide proper stewardship for the nation's 193 million acres of national forests and national grasslands. We are writing today to provide advice on how the Forest Service should move forward with its responsibilities under the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976 (RPA/NFMA), to provide rules and regulations for the planning and management of the National Forest System (the planning rules).

When a federal court ruled on June 30, 2009, that the 2008 planning rules violated the National Forest Management Act, the agency was left with the long-outdated 1982 rules. The planning rules have long been marked by litigation and controversy. As a result, Forest Service managers in the field have no clear direction or guidance for fulfilling their stewardship and natural resources development and use obligations as set forth in the Organic Administration Act of 1897, and affirmed by the Multiple Use-Sustained Yield Act of 1960 and the aforementioned RPA/NFMA. State agencies and other partners are similarly stymied in efforts to assist the agency in accomplishing its multiple use mission. We urge you to initiate a process to use much needed restoration work as a launching pad to modernize the 1982 rules as appropriate so that field managers can continue with collaborative efforts to update, amend, or revise forest plans as required by law.

The 1982 rules were written to ensure that all values and uses of national forests and national grasslands were protected from unintended consequences of natural resource extraction and development. While this is still important, times and issues have changed dramatically since 1982. Important fish, wildlife and water resources are now threatened not so much by resource extraction, development and use but by the Forest Service's inability to manage proliferating mechanized recreation and reduce forest and rangeland vulnerability to climate induced uncharacteristic fires, droughts, insect epidemics and invasive species. New rules are urgently

needed to focus the agency's limited investments and energy on the challenges of today and tomorrow.

We are impressed and encouraged by the work of the Roadless Area Conservation National Advisory Committee in helping the Forest Service and the State of Idaho to develop the Idaho Roadless Rule. Bringing together diverse interests with the goal of applying common sense to common problems for the common good is a proven remedy to gridlock. Thus, we also urge you to employ a similar approach by empanelling a group of managers, state agency officials, scientists, and other interested parties who can provide advice and counsel in addressing the role of the Forest Service in rebuilding resilience in natural systems so that fish and wildlife and human communities are better insulated against the predicted effects of a changing climate. The work of this group could serve as a basis for revisions to the 1982 planning regulations.

The so-called viability section of past regulations has served as a lightning-rod for controversy. The effects of a changing climate may even render the debate over what is required for viable populations a diversion from the real challenges that need to be addressed. We need resilient, ecologically connected populations of native and desired non-native fish and wildlife species. Predicted increases in natural disturbances associated with a changing climate, including more intense fires, earlier flooding, prolonged drought, and increased vulnerability to invasive species, make clear that we cannot solely look to managing national forest landscapes as isolated museum pieces where all assets are protected in place.

Instead, the Forest Service, working with state fish and wildlife agencies and other partners, should actively and aggressively work to protect and restore resiliency of the full range of fish and wildlife habitats, and also ensure their connections with adjacent or downstream habitats on public and private lands. This type of integrated and landscape scale approach to conservation will ensure that fish and wildlife survive a changing climate. Connecting public land efforts with associated private lands will be essential. For example, looking for opportunities to integrate Forest Service efforts with Natural Resource Conservation Service efforts to implement conservation programs under the Farm Bill will be vital.

This approach of protecting, reconnecting, and restoring landscapes will have significant benefits for human communities. For example, protecting high elevation drinking water supplies will reduce water filtration costs. Reconnecting rivers to floodplains will reduce downstream flooding costs. Restoration activities such as thinning unnaturally dense forest stands near communities will provide high paying, family-wage jobs while insulating communities from the effects of intense wildfires.

The NFMA planning rule has become a two-decade's long debate with much heat, but little light as costly and time-consuming forest plans are rarely finalized, and more rarely fully or equitably implemented. The House of Representatives has passed climate change legislation that would provide \$500 million to \$4 billion over time in adaptation funding. Restoration is adaptation. We strongly recommend that you empanel a diverse and distinguished group of experts with practical experience in natural resources planning and management to provide counsel to the Forest Service in crafting an integrated landscape scale adaptation strategy through a revised planning rule that benefits both fish and wildlife *and* human communities would help to fulfill the agency's statutory responsibilities while well-positioning the Forest Service as a leader in climate change adaptation.

We also urge you not to start over, rather to begin with the lessons learned from the 2000, 2005, and 2008 rules and build on their adaptive concepts and strengths with an aim to make the new and refined rule more responsive to the multiple use mandate of the Forest Service in context with dynamic landscapes affected by climate change.

Thank you for your consideration of our ideas. We would be pleased to meet with you to discuss our recommendations.

Sincerely,

American Fisheries Society
American Sportfishing Association
Association of Fish and Wildlife Agencies
Backcountry Hunters and Anglers
BASS/ESPN Outdoors
Berkley Conservation Institute
Boone and Crockett Club
Catch A Dream Foundation
Congressional Sportsmen's Foundation
Izaak Walton League of America
Mule Deer Foundation
National Wild Turkey Federation
The National Wildlife Federation
Pheasants Forever
Pope and Young Club
Pure Fishing
Quail Forever
Quality Deer Management Association
The Campfire Club of America
Theodore Roosevelt Conservation Partnership
Trout Unlimited
Whitetails Unlimited
Wildlife Forever
Wildlife Management Institute