

**American Rivers ♦ Defenders of Wildlife ♦ Earthjustice ♦ Environment America  
Friends of the Earth ♦ Greenpeace ♦ Izaak Walton League of America  
League of Conservation Voters ♦ Natural Resources Defense Council  
Pew Environment Group ♦ Physicians for Social Responsibility Group ♦ Sierra Club  
The Wilderness Society**

The Honorable Thomas Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S.W., Suite 200-A  
Washington DC 20250

May 13, 2011

Dear Secretary Vilsack,

We are writing on behalf of organizations with millions of members nationwide who share your strong interest in the sound stewardship of our nation's public lands, and the water resources, fish and wildlife, and many other extraordinary natural values they harbor. We appreciate the opportunity to comment on what will be one of the Obama administration's most important, and we hope enduring, conservation decisions – management rules for America's 193 million acres of national forests and grasslands.

We welcome the conservation vision outlined in this administration's initial proposal for new regulations under the National Forest Management Act (NFMA). We applaud and support your stated goals of maintaining and restoring the integrity, resiliency, and health of our national forests and watersheds. It is vital that the substance of the final rules ensure this vision is realized. They must provide clear standards and strong safeguards for managing our national forests: provisions that guide line officers away from the mistakes of the past and make public input and participation fully meaningful. To achieve that, we believe that the following top priority revisions are needed in the administration's final rules.

### **Species Viability**

The rules must include a clear commitment to maintaining the viability of all fish, wildlife, and other species, well distributed across their existing ranges on national forest lands. The identification of "species of conservation concern" whose management helps implement this commitment must be based on the best available science, not local discretion. Allowances for circumstances genuinely beyond the agency's control or the land's capability must be explicitly defined. And the rules must require nondiscretionary monitoring to validate that habitat management activities are sustaining fish and wildlife populations and to ensure that species of conservation concern are not being locally extirpated within national forests.

### **Water and Watersheds**

There must be strong protective and restorative standards for the National Forest System's water resources, with clear criteria for how to identify and manage watersheds that need protection and restoration; minimum buffer zones of at least 100 feet along streams and other water bodies unless best available science indicates a greater minimum is needed; a mandate that management activities within buffer zones promote aquatic goals; and specific guidance for how to manage and remove logging roads, which continue to be the most critical threat to water quality in our national forests.

### **Process and Accountability**

In order to ensure meaningful citizen participation in the management of our national forests, including the opportunity to engage scientists and other experts, the NFMA rule needs to retain the existing 90

days for the public to review, gather information about, and comment on final forest plan proposals, without artificial limits on what issues they can raise to higher officials.

### **Role of Timber**

This planning regulation needs to focus timber treatments on restoration and maintenance of critical environmental services. The Forest Service already has many years of work to do repairing existing logging damage, and needs to stop making the situation worse by adding to the restoration backlog with new industrially-designed timber extraction.

### **Science**

As currently written, the proposed rule requires the responsible officials “to take into account” the best science. Consistent with the Obama Administration’s strong public commitment to incorporate scientific integrity in its decision-making, the new NFMA rules need to require that Forest Service plans “conform” to the best available science, not merely consider it.

**Wilderness Act Compliance** The planning rules must assure compliance with the Wilderness Act of 1964 and the National Environmental Policy Act in considering whether to recommend roadless lands to Congress for designation as wilderness. The current proposal uses evaluation criteria from an agency handbook that does not comport with the Wilderness Act.

In conclusion, these regulations will shape the conservation and restoration plans that determine the fate of America’s forests for generations to come. It is essential that the Obama administration adopt rules that will ensure its laudable objectives for these public lands are met. We believe this will be accomplished if the final rules follow our recommendations above, for clear standards that protect water quality and species viability, consideration of potential wilderness areas, reform of timber practices, fidelity to the best available science, and full and fair opportunities for public input into the planning process.

Thank you very much for your conservation leadership, and for your consideration of our views.

Sincerely,

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