



February 16, 2010

Tom Tidwell, Chief  
US Forest Service  
1400 Independence Avenue, SW  
Washington, D.C. 20250-0003

Re: Forest Planning Rule, 74 FR 242 67165 12/18/09

Dear Chief Tidwell:


The Society of American Foresters (SAF), the scientific, educational and professional organization devoted to the sustainable and science-based management of our forests appreciates the opportunity to comment on the Notice of Intent (NOI) and Scoping for the forest planning rule. We also ask that SAF be a participant in the planning rule roundtables being organized by the Forest Service.

To achieve the goals mentioned in Secretary Vilsack's Seattle speech on domestic forests, it is vital to have a functional, practical, and efficient planning rule. The current planning process is demoralizing to the agency-- millions of dollars are spent on plans that are obsolete by the time they're finalized and then litigated over and over again. As the Forest Service reviews numerous lengthy comments on the NOI, we have one request: please keep the rule as simple as possible. An exhaustive, complicated new planning rule will only exacerbate existing problems, inviting more litigation, cost and frustration at no benefit to our national forests.

The Forest Service desperately needs a rule that is flexible and adaptable to new information and quickly changing economic, social, and environmental conditions. It needs to be collaborative and easy for the public to understand. Further, it needs to be practical and implementable in a relatively short amount of time. With a more efficient and flexible planning process, agency land managers would be able to devote more of their scarce resources to implementing the forest plan and actual projects on the ground.

Thank you for the opportunity to comment. SAF is dedicated to helping USDA craft a planning rule that will work for planners, land managers and the many different stakeholders concerned about our national forests.

Sincerely,

  
Michael B. Lester, CF  
President