

Recommendations for the Sierra Nevada Framework: Responding to the National Review Team's Report 8/29/2000

The Sierra Nevada Framework decision will amend 11 existing forest plans to deal with the problems of old forest, aquatic and riparian and meadow, fire and fuels, noxious weeds, and lower Westside hardwood forest stewardship. National Forest conservation is far broader than these five problems, yet the sense of urgency is exceptionally high for each and the existing forest plans are in various stages of obsolescence with respect to each. A decision for the Sierra Nevada project will place the national forests on a path that is substantially different than the past. The stage will be set for forest plan revisions to address other issues, including water, recreation, and economic and social development that will attend the projected expansion of California's population to 60 million by 2040.

During the decade of the 1990s, substantial interest was directed toward several of the problems included in the Sierra Nevada EIS. The decade began with significant attention focused on the need to conserve the California spotted owl. A comprehensive technical report on the spotted owl was published in 1992 and follow-up interim guidelines to protect the owl on the national forests were issued in 1993. A draft EIS to replace the interim guidelines and establish standards and guidelines for spotted owl habitat management was released for public review on February 3, 1995. A Revised Draft EIS to provide a permanent solution to spotted owl protection and several other issues, including riparian conservation, was approaching finalization in 1996 when work was suspended pending a review by a federally chartered advisory committee. The committee concluded that the proposed RDEIS was inadequate as either an owl conservation plan or as an ecosystem plan.

On a parallel, but related track, the report of the Sierra Nevada Ecosystem Project was issued in 1996 and provided a comprehensive treatment of environmental, social, economic, and demographic trends and issues in the Sierra Nevada. Problems were identified, notably that the three most altered ecosystems in the Sierra were old forests, aquatic and riparian, and lower Westside hardwood. Though the SNEP report did not thoroughly develop solutions, there was encouraging discussion as to the possibilities for solution.

During the spring of 1998, direction was issued to the national forests in the Sierra Nevada to be especially aware of several unresolved issues—especially old forest, aquatic and riparian, and fire and fuels. At the same time, the Pacific Southwest Research Station prepared a scientific review of the science surrounding the most pressing issues for national forest conservation in the Sierra Nevada. The report drew heavily from SNEP and from more recent science. At the same time, the Sierra Nevada Framework project was launched to address the five problem areas characterized by the greatest sense of urgency. The Framework approach to amending forest plans has been to bring the best scientific thinking to bear on policy formulation, and to do so in an open, collaborative manner.

Significant coordination and outreach has occurred during the preparation of the Sierra Nevada Framework DEIS. Five of the seven action alternatives reflect, to varying degrees, the recommendations of groups or agencies with ideas on how the national forests could be managed to address the five problems.

The national review team has concluded that significant improvements would need to be made before a credible, defensible decision for the Sierra Nevada could be made. We concur. Much, but not all comment by the public and national review team can or should be addressed as we finalize the EIS. We are committed to developing a final EIS that is more understandable than the draft, is defensible as the basis for our decision, meets public expectations, is implementable, and is cost efficient.

Our recommendations, by six broad areas of concern, are as follows. As preface, we do not concur with the national review team's conclusions that Option A ("continue") will result in a product that is neither understandable nor defensible. We believe that the improvements we have underway will make significant improvements in understandability and defensibility.

Strategies for addressing national review recommendations. Estimated completion dates for options and recommended actions in parentheses.

	Options		
Issue	A (10/00)	B (12/00)	C (12/01)
I. Alternative structure			
1. Vision: Review team wants vision of what the Sierra Nevada will look like long term. There are competing views about what that vision should be.	Stay with existing set of alternatives and descriptions	Historical conditions vision	“B” plus new alternative
Recommended Action: Option A plus components of B. Develop vision statements as a component of each of our 5 problem areas and alternative theme descriptions. If necessary, based on public comment, develop another alternative and do a supplemental EIS. (11/00)			
	Options		
	A (11/00)	B (11/00)	C (12/00)
2. Linkage to SNEP: Team did not feel that linkages to SNEP were obvious	Leave as is	Document references to SNEP	“B” plus science consistency check
Recommended action: Option C. Better feature discussion of all relevant background materials and products such as SNEP, FACA committee report, and science review. We anticipate doing science consistency check of the FEIS and draft ROD. (12/00)			
	Options		
	A(11/00)	B (11/00)	C (11/01)
3. Fire and Fuels: The review team saw SPLATS as the only strategy featured.	Leave as is	Describe fuels management alts not considered in detail	Construct range of fire loss reduction strategies
Recommended action: Modified option C. We are featuring all types of fuels treatments and we are considering a range of fire loss scenarios and a range of strategies to deal with them. Fuel management strategies are being described with their associated uncertainties and risk. Effects analysis will clearly display those uncertainties. (11/00)			

	Options		
	A (11/00)	B (11/00)	C (02/01)
4. Adaptive Management: Did not see depth in adaptive management strategy in DEIS	Leave as is	Better describe monitoring and response option sets	Develop an integrated monitoring and adaptive management strategy for all issue areas
Recommended action: Modified option C. Develop an adaptive management strategy, appropriate for each alternative, that addresses key elements with their associated risk and uncertainties. The strategies identify triggers that initialize changes in management activities. Develop a specific monitoring plan for the decision. (12/00)			
	Options		
	A (10/00)	B (10/00)	C (10/01)
II. Modeling: Concerns about the following areas of analysis	Leave as is	Document existing assumptions and rationale	Redevelop modeling parameters
Accuracy Assessment			
Choice of models			
Prominence of timber in objective function			
Assumptions about treatment effectiveness			
Recommended action: Option B expanded with sensitivity analysis. We will continue to use the latest modeling tools available to develop alternatives and evaluate their effects. These tools include GIS for spatial analysis of data layers; FLAMMAP for hazard and risk mapping; FARSITE for spatial fire behavior; SAFE D for landscape fire behavior/vegetation and fuel changes over time; GAMMA to do growth and yield modeling; SPECTRUM to receive these inputs and optimize output metrics based on multiple objective functions (old growth, owl habitat, stand replacing events, fuel treatments, timber volume, PNV); RELM to further refine SPECTRUM at the watershed level; VDDT to do sensitivity analysis of stochastic events such as fire and drought; BAYVEG to capture variation in projected (future) stand conditions; and CWHR to project species habitat relations. Collectively these models are the best tools available to estimate effects in a dynamic system affected by human and natural disturbance at multiple temporal and spatial scales. We intend to do a thorough job documenting assumptions, parameters and model limitations. (10/00)			

	Options		
	A (10/00)	B (11/00)	C (11/01)
III. Aquatic Conservation strategy	Revise purpose and need	Rethink strategy and integrate priorities for restoration, etc	Identify inadequacies and commit to supplement
Clarity of strategy			
Consistency with purpose and need			
<p>Recommended action: Option B. We intend to clarify the scope of the problem we are trying to solve by modifying the purpose and need to clearly convey our intent to amend, not revise, the existing forest plans (comprehensive treatment of dams, diversions, FERC re-licensing are examples of issues that are beyond the scope of this EIS). Following the review team’s suggestions comprehensively display the link or path between: (1) a revised set of aquatic conservation strategy goals, (2) watershed condition for 5th field watersheds and their Clean Water Action Plan conditions, (3) the species of concern and interest within those watersheds, (4) the stressors affecting those watersheds, and (5) the recommendations for level of watershed analysis, default standards and guidelines, including those that can be amended through watershed analysis. Information developed since the DEIS release will be used to prioritize watersheds and better evaluate cumulative effects. (11/00)</p>			
	Options		
	A (11/00)	B (12/00)	C (12/01)
IV. Species Effects	Clean up existing analysis	Establish common outputs across species	Redo analysis with front end expert involvement
Consistency of methods			
Integration of experts			
Risk factors and roles			
Specification of outcome or rating scales			
Species selection			
Likelihood of meeting legal obligations			
<p>Recommended action: Option B with modification of the scope of the species. Augment the interdisciplinary team and science team by contracting with species experts to provide us additional advise us on measures to conserve controversial species identified in the NOI. Expand our discussion of effects on other species wherever we have information that will help us do so. Document rationale for selection of certain species for greater level of analysis over others. (12/00)</p>			

	Options		
	A (10/00)	B (10/01)	C (11/00)
V. Economics and social	Make planned changes	Peer review current analysis	Describe demographic patterns that aggravate the fire problem, etc
Differences between alternatives			
Emphasis on employment			
Demographic patterns and fire loss			
Cost effectiveness of fire and fuels programs			
Recommended action: Option A with some C. Improve the existing treatment of effects; use the review team's recommendations to reinforce the analysis already intended. We will add the effects on land use changes, effects on private land, and economic and social impacts of catastrophic fire. (11/00)			

	Options		
	A(10/00)	B (11/00)	C (6/01)
VI. Cumulative Effects Analysis	Revise to include linkages with other ongoing National policy development.	Revise with A, plus addressing reasonable foreseeable action on private lands, and augment analyses of specific resource areas.	Revise with option B, plus extensive data collection from counties, tribes, and the State on trend analyses for reasonable foreseeable future development and uses.
Links to National Policy			
Trends for private land			
Resource effects			
<p>Recommended Action: Option B. Revise the cumulative effects discussion in Chapter 3 to include links and cumulative effects with ongoing national policies to include the planning rule, roadless rule, roads rule, strategic plan, and cohesive fire strategy. Expand the cumulative effects discussion in Chapter 3 to include discussion of past trends on private lands relative to the five issue areas and the projection of reasonable foreseeable trends for these same issues with geographical specificity. Revise Chapter 3 to include a cumulative effects analysis considering private, tribal, and State actions that contribute to the incremental contributions of the SNFP to air quality, water quality, wildfire risk and occurrence, focal species (owls, goshawks, and willow flycatcher), forest carnivores, and aquatic species. (11/00)</p>			

Summary:

- We intend to make significant improvements between draft and final that are essential for a reasoned decision—those improvements will reflect the thinking of the review group.
- We recognize that further analysis beyond that proposed, and which would require additional time and effort, would add to the already considerable information that might inform the decision.
- The advantages of additional analysis must be weighed against the costs of disappointment and dismay that certain stakeholders will feel if we choose to delay the decision.
- We believe additional effort to enlist species experts in designing and evaluating our management choices will reinforce our confidence in the final decision.
- Care in identifying adaptive management assurances and clarity in implementing the decision will give us the opportunity to adjust our decision and cope with uncertainties, unanticipated circumstances, and new information.
- This decision will set a sensible foundation for forest plan revisions (to deal comprehensively with water and recreation) and Forest Service participation in solving issues that transcend federal land and jurisdiction.

Task	Timeline for Recommended Action	Timeline for Full Option C as proposed by National Review Team
A. Complete Refined Modeling and Analysis	10/00	10/01
B. Response to Public Comment	10/00	10/00
C. <u>Washington Office and National Review Team recommendations (Aquatic Conservation Strategy, Cumulative Effects)</u>	11/00	11/01
D. <u>Science Consistency Review</u>	12/00	12/01
E. Consultation with FWS Biological Opinion	12/00	12/00
F. Update S&G's	11/00	12/00
G. <u>Update effects analysis (Species and Social Economic)</u>	12/00	6/02
H. <u>Monitoring Plan (Adaptive Management)</u>	10/00	12/01
I. Integrate new information into document (Alternative Structure)	Ongoing 12/00	4/02
J. <u>Identify preferred alternative</u>	11/00	4/02
K. <u>Draft Record of decision</u>	12/00	5/02
<u>Issue FEIS and ROD</u>	12/00 *	6/02

* Assumes everything goes as planned with no restarts