

National Forest Management Plans

September 2016

Use plans to protect rivers

In a nation of highly developed working rivers, a vigorous effort to protect remaining intact, healthy rivers and stream corridors is essential and always timely.

While the best-known and most enduring method of protecting rivers is congressional designation of rivers into the *National Wild and Scenic Rivers System*, we can also secure more immediate administrative protections through federal land management plans.

The revision or update of these plans is your cue for action.

Preparation and implementation of revised forest plans include three primary phases, each with enhanced opportunities for public comment and involvement:

Assessment

Evaluating the current situation on the ground, determining changes and improvements needed

- Use best available scientific information
- Pre-assessment
- Assessment

Revision

Essentially the new, revised management plan

- Plan Development, comparative alternatives
- Proposed plan
- Final plan, record of decision

Monitoring/adaptive management

Day-to-day management actions under the new plan

- Implementation of the plan
- Monitoring and evaluation
- Adjust plan as needed

For details, read on...

NOTE that the U.S. Forest Service published in 2012 its new and long anticipated rule on forest planning and plan revisions. The agency has portrayed this rule as a means to simplify and speed up forest planning.

Rivers-specific: In response to the new rule, the USFS has also updated its Forest Service Handbook section regarding wild and scenic rivers – Section 1909.12, Chapter 80.

A few forest plan revisions already started under the old (1982) planning rule might continue under that rule, and attention to which rule is used for your local plan revision is important. The majority of current revisions, and all upcoming revisions, use the new rule.

Forest plans, and how to influence them

Assessment

Public notification (beginning of the plan-revision process)

Assessment of existing information on key features and activities

This first phase generally reviews current conditions of, and factors affecting, the national forest, including the need for a plan revision. This and subsequent phases of the planning sequence are announced in a combination of notices in the *Federal Register*, information on the forest's internet site, and general publicity.

Rivers-specific: This assessment (and pre-assessment) phase includes extensive public review and comment opportunities, typically in a combination of public meetings, formation of advisory or working groups, and opportunity to submit written comments to influence the assessment and the subsequent proposed plan. This is the first opportunity to submit detailed, well-documented information about priority rivers (and to establish yourself as a credible source of rivers data and knowledge).

Among other things, this assessment must be heavily founded in the best available scientific information. Some of this information may be gathered by the agency, but other details and interpretation can and should come from interested groups and advocates.

Insist that the agency provide details of its analyses during this phase—what data and other information was used in reaching conclusions, w&s eligibility *e.g.*

Press for detailed description and documentation of river values identified (in w&s eligibility report *e.g.*)—specific features,

species, and activities rather than the generalized eligibility categories often used in eligibility reports: recreation, geology, vegetation *e.g.*—and submit your own details.

Revision

Preparation of the forest plan must include several specific components: desired conditions, objectives, standards, guidelines, goals. It is important that each of these components be addressed for specific high-value rivers.

The plan must also address several specified features of the forest, among them several related to rivers and their health: priority watersheds, riparian areas, water quality, water resources, diversity of plant and animal communities, ecosystem services, opportunities to connect people to nature, sustainable recreation. Advocating for rivers protection within the plan may be addressed through provisions proposed for these features, in addition to direct wild and scenic emphasis.

Develop proposed plan (with accompanying environmental analysis), including desired conditions, objectives, standards, guidelines, goals, suitability of lands for specific uses,

Rivers-specific: The proposed plan must identify the eligibility of rivers for inclusion in the National Wild and Scenic Rivers System (unless such an inventory was previously completed and conditions have not changed since). Comment on the adequacy (or inadequacy) of any previous inventory cited, propose rivers for inclusion in the new eligibility assessment, critique the adequacy of any list of eligible rivers published by the forest.



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Public comment on proposed action (preliminary plan, with draft environmental impact statement)

NOTE that the agency may have on record previous w&s eligibility reports. The agency may rely on that previous information for evaluating rivers' current eligibility and suitability, or the agency be obliged—and pressed—to update its information and eligibility review if the previous version is out of date or otherwise inadequate.

Rivers-specific:

- a) The proposed plan must also extensively address ecological sustainability, including attention to aquatic ecosystems and watersheds, water resources, riparian areas, water quality, the interdependence between terrestrial and aquatic ecosystems. Submit comments that emphasize protection for rivers, including use of wild-and-scenic eligibility and suitability to address various water-related management needs.
- b) The proposed plan must include standards and guidelines for management and protection of already designated wild and scenic rivers and for management and protection of rivers found eligible or determined suitable for designation. Comment on the details of these provisions management and protection provisions, pressing for the highest level of protection.
- c) The proposed plan must include specific provisions for monitoring the ongoing effectiveness of the new plan, including specified questions and associated indicators for specific resources conditions and management prescriptions. Comment specifically on the forming of those questions and indicators related to rivers in general and to eligible and suitable rivers in

particular; be sure that these measurements are clear and that failure to meet them will result in positive adjustments.

d) The plan revision process must address rivers' potential and eligibility for wild and scenic protection. Comment on draft list of initial list of rivers to be studied, on the draft eligibility report, and on draft suitability report (if included in the planning process*); highlight rivers that are left out, are inappropriately found not eligible or not suitable.

(*W&S suitability might also be determined in the plan, but that is not required under the planning rule. Suitability may also be addressed at a separate time.)

Potential and existing wild and scenic rivers are specifically listed as one of several "major planning topics" in the Forest Service's A Citizens' Guide to Forest Planning

Alternatives development

The forest must prepare a range of alternatives to the proposed plan (for assessment in the accompanying environmental impact statement (EIS)). Generally, this range includes an alternative emphasizing development and resource extraction, an alternative emphasizing preservation of natural features and processes, and one to three additional alternatives. Often this range of alternatives is published separately for public information (sometimes with, sometimes without a public comment opportunity).

Rivers-specific:

If the agency invites comment on the range of alternatives, submit comments supporting inclusion of specific high-value rivers in at least one alternative; ask for adjustments if key rivers are not included.

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- **Environmental Impact Statement**
Integrated among the various phases of the plan revision process are comment periods on the environmental impact statement (EIS) addressing the proposed plan and alternatives, as required under the National Environmental Policy Act (NEPA)—in draft, then final form. Many of the details of the proposed plan will be found in the EIS and its appendices.

Rivers-specific:

Support the alternative, or portions of alternatives, that include the best list rivers as eligible and suitable, that provide the most effective and reliable protections for eligible and suitable rivers, and that provide the most effective and reliable protections for rivers and river corridors in general.

Draft record of decision (proposed final plan), with final EIS

Objections (administrative review)
People who are dissatisfied with the proposed final plan, EIS, or record of decision and who have been involved in the revision process will have 60 days to object; negotiations with the Forest Service follow.

Final plan, final record of decision

Monitoring, evaluation, adjustment

The plan must include a monitoring process for ongoing assessment of plan's effect on watersheds, ecological conditions, focal species, visitor use, progress toward desired conditions and objectives, effects of management systems.

More information

See *American Rivers'* full wild & scenic rivers advocate's resource center at www.americanrivers.org/wildriverresources

