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New Rule: Scientists Say Stronger Science Standards Will Protect National Forests

Washington, D.C. – The Forest Service should enact stronger science-based standards in its proposed national framework for the management of 155 National Forests and 20 Grasslands according to the Society for Conservation Biology (SCB; www.conbio.org), an international conservation society with nearly 10,000 members worldwide.

SCB along with some of the nation's top scientists reviewed each of five focus areas in the agencies' draft Environmental Impact Statement[1] on the service's proposed rule[2]. While reviewers noted that the planning rule was in certain respects a marked improvement over the 1982 forest rule that is currently in effect, they called on the Forest Service to make improvements in order to reach the agencies' stated goal of protecting water and wildlife in a changing climate and to meet the requirements of the law in today's world.

Key findings of the SCB review include:

1. **Wildlife viability** – the Forest Service has a legal mandate to maintain plant and animal diversity across the National Forest System and to fulfill its mandate. The agency needs to ensure that all fish and wildlife species have the best chance of persisting in the face of climate change and ongoing land uses. The agency needs to adopt stricter measures to ensure wildlife are well-distributed and populations are viable across the National Forest System.
2. **Watershed integrity** – the Forest Service should adopt watershed assessments as a national standard to guide restoration priorities and include riparian conservation areas with protective streamside buffers of at least 100 feet. Road removal and remediation in riparian conservation areas and key watersheds managed for aquatic species and clean water should be the top restoration priority.
3. **Climate change adaptation –** the Forest Service fell short in failing to acknowledge the importance of climate change and the vast body of scientific knowledge about potential consequences. If a forest plan is intended to last 15 years it is absolutely necessary to include climate change in the management decisions being made on that timeline. Failure to do so will mean scientifically flawed plans are created and inadequate management decisions are made.

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[1] http://www.fs.usda.gov/wps/portal/fsinternet/!ut/p/c5/04_SB8K8xLLM9MSSzPy8xBz9CP0os3gjAwhwtDDw9_AI8zPwhQoY6IeDdGCqCPOBqwDLG-AAjgb6fh75uan6BdnZaY6OiooA1tkqlQ!!/dl3/d3/L2dJQSEvUUt3QS9ZQnZ3LzZfMjAwMDAwMDBBODBPSEhWTjJNMDAwMDAwMDA!/?navtype=BROWSEBYSUBJECT&ci.

[2] **Federal Register** / Vol. 76, No. 30 / Monday, February 14, 2011 / Proposed Rules; http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5270250.pdf

4. **Climate change mitigation**–despite the mention of forest carbon in the management of National Forests and Grasslands, considering only the live carbon stored in forest and grassland vegetation is *completely unacceptable* and *scientifically indefensible*. This deficiency will result in numerous challenges of forest plans that will be impossible to defend. Offsets such as biofuels and substitution of wood for other, more energy-intensive materials should be included with the caveat that they be treated in a realistic manner. For example, it is not credible to assume that all biofuel harvests are automatically carbon neutral.
5. **Ecosystem restoration and resilience to climate change** – the Forest Service should allocate substantial portions of the National Forest System to reserve-style management and other portions to creative experimental management to restore degraded areas and prepare for climate change.

Commenting on the findings, SCB's Policy Director John Fitzgerald said, "We urge the Obama administration to set a higher standard of scientific integrity in rulemaking. While the proposed rule is in some ways an improvement over the status quo, tighter language is needed to close the loopholes and require that the best science is used in forest planning." He noted that "stricter language will ensure that the rules as finally adopted and put into practice, monitored and enforced, will be more likely to fulfill the requirements of the National Forest Management Act and the other laws that set the standards of stewardship for our National Forests."

Dr. Lara Hansen, Chief Scientist at EcoAdapt , an organization working to help people adapt to climate change, underscored the importance of the National Forest System in the face of climate change. She noted " our public lands and waterways are irreplaceable. Unlike housing or shares on the stock market that may rise and fall in value, our forests can be steady, productive assets, giving us fish and wildlife, cleaning our water and air, buffering floods and drought, and providing other services that society needs now more than ever as we respond to climate change."

According to Dr. Barry Noon, Professor of Fish, Wildlife, and Conservation Biology at Colorado State University "We need stronger rules to ensure the fish and wildlife species on our national forest system lands are managed for viable populations to avoid weakening our forests and grasslands and depleting our country of native pollinators for agriculture, fish and game and many other forms of natural wealth that is our American heritage."

"Taken together, SCB's legal and scientific analyses mean that the proposed rules as they stand fall short of the mark for effective resource management that would withstand challenges and fulfill the intent of the law, said, Fitzgerald. See the full SCB review at www.conbio.org/resources/policy.

A separate review of the Draft Environmental Impact Statement, commissioned and released by the Forest Service on May 5[3], also called on the agency to provide more specificity in managing the nation's fish, wildlife, and water, particularly in a changing climate.

[3] http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5295052.pdf>.

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