



February 16, 2010

Forest Service Planning NOI
c/o Bear West Company
172 E 500 S
Bountiful, UT 84010

Dear Forest Service Planning Rule Team (fspr@contentanalysisgroup.com):

The National Association of State Foresters (NASF) appreciates the opportunity to comment on the Notice of Intent (NOI) for a new National Forest System (NFS) land management planning rule. NASF is a non-profit organization that represents the directors of forestry agencies from the fifty states, eight U.S. territories and associated states, and the District of Columbia. Our State Forester members share a public trust responsibility with the Forest Service in managing and protecting the nation's forests. We ask you to consider our comments with this perspective.

The new planning rule must contribute to a national forest conservation vision for all lands by facilitating on-the-ground forest management, protection, and restoration activities on National Forests and grasslands. The health and sustainability of public, private and state lands are interdependent and threats to forest health do not respect boundary lines. The new planning rule must guide public land management in a manner that considers ecological, social, and economic elements of sustainability. It must support the needs of adjacent communities and landowners as well as federal agency land managers.

NASF urges that the new planning rule retain an outcome-based approach that focuses on Forest Plan implementation, desired future conditions, and measurable objectives. Principles of restoration must be included in this new planning rule as a subset of the sustainability and diversity provisions. Restoration activities contribute to the recovery of ecosystem resilience and adaptive capacity, as well as support the economic viability of local communities.

Due to the minimal engagement period (60-day minimum required by National Environmental Policy Act), NASF will submit detailed comments and suggestions in the next phase of this process. We look forward to continuing to engage in this very important planning effort. Please direct any questions to NASF Director of Forest Policy Jake Donnay (202-624-5977 or jdonnay@stateforesters.org).

Sincerely,

President and Maryland State Forester