Proposal for NEPA Alternatives

Sponsored by: The Nature Conservancy, Southern Environmental Law Center, Evergreen Packaging, National Turkey Federation, The Wilderness Society, Root Cause, NC Wildlife Federation, MountainTrue

This proposal is to use NEPA alternatives to help us compare different win/win solutions proposed by Forum members.

For example, some have proposed an emphasis on ecological restoration, while others have proposed more emphasis on backcountry values or creation of shifting mosaics of habitat. We propose that the NEPA alternatives look at different ways of combining these management strategies, and that **each alternative in the plan be designed to minimize conflict and maximize progress towards the desired conditions that reflect each of our values**. Instead of several win/lose alternatives, we propose that the alternatives attempt to compare different Forum ideas for win/win solutions.

We realize that this means that none of us will see his or her ideal, 100% perfect alternative analyzed in full detail. But we also recognize that none of us will ever see that personal ideal plan *implemented*, because the Forest Service's job is to balance many uses. We would therefore rather see a set of fully analyzed alternatives, all of which attempt to make the greatest possible progress from the status quo, and all of which are implementable.

Instead of assuming that our various interests are in tension with each other, we propose that the Forest Service show how they can be complementary. We believe we can make progress towards all our many goals by working together, which was the idea that brought us together as stakeholders in the first place. We would like to see the NEPA process reflect that premise.

If our interests were mutually exclusive (if, for example, protecting old growth would always result in less young forest habitat), then it would make sense to include "win/lose" alternatives, such as an alternative with lots of old growth and less young forest, and another alternative with lots of young forest and less old growth. Instead, we propose that each alternative use tiered objectives to show how we can do both, and emphasize recreation and clean water too.

Our discussions

As we understand it, the Forest Service has been expecting to come up with a single, evolving plan alternative, and that the NEPA process will look at "bookends" for analysis, each of which will favor some interests over others. A small group of us got together because we were worried that these win/lose alternatives would inevitably move us away from consensus, and drive us towards singular positions.

After talking with the planning team, we realized that the Forest Service understands these potential problems, and that they have been hoping the Forum can help to solve them by narrowing the range of disagreement through collaboration. But what happens if the range of general public opinion is still very broad compared to the collaborative group? The full range of disagreement will still need to be reflected in the alternatives, and the bookend alternatives could still be very far apart.

We observed that the use of bookend alternatives is based on theoretical tradeoffs, and on an assumption, that there's not enough room on the forest for any of our interests to grow unless we take away from another interest(s). However, we do not believe this assumption is true. While it is true that, at some point, increasing levels of backcountry and/or wilderness would interfere with our ability to increase the pace and scale of restoration, and vice versa, we are far below that point now. This reality allows us to make progress towards all our goals without working at odds with our colleagues.

Instead of theoretical tradeoffs based on land allocations, the real tradeoffs we have noticed in Forum discussions are between:

- predictable flow of young forest habitat/forest products and ecological need
- economic efficiency and distribution of management activities
- restoration at landscape and fine scales
- scheduled/managed succession and restoration/mimicking of natural disturbance processes.

These are critical tradeoffs to analyze, but none of them inherently prevents us from moving incrementally toward many goals at the same time.

Our Proposal

First, we propose that extreme win/lose alternatives be eliminated from detailed consideration in the NEPA process. To be clear, we do not believe that either "custodial management" or "no wilderness" alternatives meet the multiple use mandate or the "givens" for the planning process. The "givens," incidentally, should serve as good screening criteria to determine whether an alternative should be considered in detail.

Second, we propose that the NEPA alternatives examine different strategies for locating zones of agreement in the plan. This proposal is based on our assumption that prioritizing work in a zone(s) of agreement will allow for the most progress from the status quo.

We believe that the Forum has identified several large zones of agreement already. Areas outside the "overlap" between the wildlife alternative and natural area priorities have been broadly supported for their respective management emphases. We propose that these zones of agreement be reflected in all the alternatives that receive detailed consideration.

With respect to the overlap areas, where there is still some potential conflict, we are aware of multiple options for solving the problem. We have drafted three potential alternative options to provide concrete examples of how this might work and have included them with this document as Appendix A. We recognize that there are probably other alternatives that are win/win options and would like to take time to explore this further. In Appendix B we have addressed how the example alternatives meet the NEPA requirements as we understand them.

Third, we also propose that each NEPA alternative use the concept of tiered objectives and adaptive management triggers to ensure that progress is made on multiple goals at the same time. The precise triggers would vary between alternatives, but the concept would be the same: a first tier of management objectives and wilderness recommendations would be set at a level where we are confident they will both be achievable without interfering with other goals, and a second tier would provide for sustained progress toward management (habitat and recreation) goals before additional

wilderness recommendations become effective. In other words, wilderness recommendations that create substantial uncertainty about our ability to sustainably meet other management goals would be made provisional, while recommendations that do not create uncertainty would be made in the first tier.

In summary, we are proposing an innovative use of alternative development to achieve a collaborative plan that furthers our dialogue. We hope that you will strongly consider this proposal to support the collaborative process that we have all invested so much time and effort in.

Appendix A. Potential alternative options to be considered.

A. Ecological restoration on a large landscape - the "granular" approach

This alternative would ensure that we can meet ecological restoration needs wherever we find them, subject to accessibility, and as would result in broader distribution of habitat diversity. Stand-level need would determine treatment. Balancing age classes would not drive stand-level prescriptions, but ecological restoration would result in a mix of young and open habitats of various sizes and configurations. Top priorities would be to treat stands with uncharacteristic vegetation and to provide underrepresented conditions by manipulating overrepresented conditions. Old growth and state natural areas would be managed, if at all, to enhance or restore the unique contributions to ecological integrity for which they have been identified. Old growth restoration would be preferentially located where it would provide connectivity or permeability between existing patches or natural areas. This alternative would make the most rapid progress toward restoring ecological integrity at the fine and landscape scale and would have the widest distribution and variety of habitat diversity, but it would have a somewhat less predictable flow of large-patch young forest habitat and forest products. In general, projects would have lower impact on recreation and scenic values while providing a similar amount of forest products distributed across the forest. This could result in lower receipts that could be utilized for other goals such as recreation infrastructure, facilities, road maintenance, etc. The charts below provide summary information that may be helpful.

Alternative	Land Allocated to Matrix	To Ecological Restoration	To Backcountry
Granular	None	Largest	Smallest

Alternative	Portion of landscape open to all tools	Flow of large patch ESH	Intensity of stand-level treatment	Volume of forest products	Total number of acres treated
Granular	Largest	Least predictable	Mixed, but lower on average	Same or nearly same in each alt.	Highest

B. Backcountry and balanced age classes - the "spatial" approach

This alternative would shift areas with high biodiversity and sensitive contexts, including areas with high relative proportions of old growth and state natural areas, from interface/matrix into backcountry. This would result in some accessible areas being placed into backcountry, but the backcountry MA would allow the use of existing roads for ecological restoration to restore natural processes. In the matrix MA, plan components would provide for restoration *and* balancing of age classes. This alternative would make some progress toward restoring ecological integrity, but it would have a higher and more predictable rate of large-patch young forest habitat creation and forest products. Projects might have more of an impact on recreation and scenery in the interface and matrix, but backcountry recreation would expand and projects would be likely to provide higher receipts for other goals (access, recreation infrastructure, and facilities). The charts below provide summary information that may be helpful.

Alternative	**Land Allocated to Matrix**	**To Ecological Restoration**	**To Backcountry**
Spatial	Largest	None	Largest

Alternative	**Portion of landscape open to all tools**	**Flow of large patch ESH**	**Intensity of stand-level treatment**	**Volume of forest products**	**Total number of acres treated**
Spatial	Smallest	Most predictable	Mixed, but higher on average	Same or nearly same in each alt.	Lowest

C. Ecological Restoration and balanced age classes - the "blended" approach

This alternative would attempt to blend ideas from the other two. By fine tuning MA allocations, it would likely support the quickest increase in the pace and scale of active management, but it would also require the greatest amount of place-based collaborative discussion.

- A large majority of the current interface and matrix would provide for both ecological restoration and balancing age classes, as in the "spatial" alternative above.
- Portions of the current interface and matrix that provide important natural area values (old growth, rare and exemplary communities, and WIA cores) and provide for natural recreation experiences would be mapped into an ecological restoration MA. The ecological restoration MA would have components like the "granular" alternative above, and it would emphasize restoration of natural settings in the long term and interpretation for active and recent projects in the short term. These areas would typically border backcountry "cores."
- The least accessible parts of the current interface and matrix (including WRC recommended backcountry, semi-primitive non-motorized cores, and contiguous old growth and state natural areas) would move into the backcountry MA.

This alternative would make a medium level of progress toward restoring ecological integrity on a large landscape, but it would also have a higher and relatively predictable flow of large-patch young forest habitat and forest products. Widely distributed projects would impact recreation and scenic values in the short term, but would educate users through interpretation and would attempt to restore natural settings where possible in the long term. In addition, receipts would be available to meet goals for recreation, access, and facilities. The charts below provide summary information that may be helpful.

Alternative	Land Allocated to Matrix	To Ecological Restoration	To Backcountry
Blended	Medium	Medium	Medium

Alternative	Portion of landscape open to all tools	Flow of large patch ESH	Intensity of stand-level treatment	Volume of forest products	Total number of acres treated
Blended	Medium	Moderate predictability	Mixed	Same or nearly same in each alt.	Moderate

To summarize, as shown in the tables below, the "granular" approach would emphasize context-sensitive ecological restoration over the largest total area. The "spatial" approach would favor predictability and efficiency of young forest creation/forest products over context-sensitivity but would limit the distribution to avoid areas with difficult contexts. The "blended" approach would have the second widest distribution of activities, and it would ensure predictability, efficiency, and a moderate rate of progress toward ecological restoration. We expect the total volume of management would be the same or nearly the same for all alternatives, but the spatial distribution, intensity, and number of total acres treated would vary. The economics of each of these options could also vary considerably.

Alternative	Land Allocated to Matrix	To Ecological Restoration	To Backcountry
Granular	None	Largest	Smallest
Spatial	Largest	None	Largest
Blended	Medium	Medium	Medium

Alternative	Portion of landscape open to all tools	Flow of large patch ESH	Intensity of stand-level treatment	Volume of forest products	Total number of acres treated
Granular	Largest	Least predictable	Mixed, but lower on average	Same or nearly same in each alt.	Highest
Spatial	Smallest	Most predictable	Mixed, but higher on average	Same or nearly same in each alt.	Lowest
Blended	Medium	Moderate predictability	Mixed	Same or nearly same in each alt.	Moderate

Appendix B. Meeting NEPA Requirements

It is our understanding that NEPA alternatives must meet a number of policy requirements, and we think these example alternatives will satisfy each of them.

First, alternatives must resolve tradeoffs. The example alternatives included in Appendix A are options that would consider tradeoffs between predictability, economic efficiency, and ecological need at multiple scales without creating artificial tradeoffs between stakeholders' interests.

Second, each alternative must address one or more issues. The issues that the agency has identified for our planning process are wildlife habitat, designations, access, and recreation (from April 2014). Each of our example alternatives addresses these issues from a different angle, showing pros and cons of various strategies for each issue (Appendix A).

Third, the alternatives must cover the full range of reasonable public perspectives. For example, some members of the public may ask for high levels of backcountry, while others may ask for high levels of wildlife habitat creation. Instead of creating alternatives that capture the range of perspective *between different alternatives* (e.g., a low habitat alternative and a high habitat alternative), we are proposing to analyze the range of reasonable management outputs *within each alternative* using tiered objectives. In other words, each alternative would include both a lower (tier 1) and higher (tier 2) output for management goals.

Fourth, alternatives must compare "apples to apples." This means that all plan alternatives will use the same set of management area "buckets." We recognize that this is a challenge and in our example alternatives we have used three primary Management Areas: Ecological Restoration, Balancing Age Classes (Matrix), and Backcountry. In these examples, Ecological Restoration and Matrix would differ by the purpose and long-term goal of management, but not by the tools available to accomplish it. Backcountry would allow ecological restoration, but would not allow road construction.

Note: The interface would no longer be mapped as a spatial MA, but the unique needs of open road corridors would be considered instead using forest-wide components. This would allow changes to the road system to be made more easily during implementation. Areas currently mapped as interface where the primary recreational use is hunting or wildlife related (seasonal road corridors) would not be considered as interface for purposes of scenery standards.