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Comments

I have read the National Forest System Land Management Planning Notice of Proposed rulemaking and am writing in response to the request for comment. As a relatively recent member of environmental academia whose background has emphasized the interdisciplinary aspects of ecology, I commend this plan's adherence to the dominant paradigm shift toward ecosystem management. One sentence that I believe captures this shift expressively is as follows: "Land management planning is complex and decisionmakers must consider such things as balancing competing values or competing ecological concerns" (USFS 2011). This is a task that is by no means easily definable or manageable. Although, I believe it is an important guiding mentality to keep when looking for areas to better achieve the stated mission of the United States Forest Service. One opportunity for improvement can be found in the gap that is implied to exist by the language of this notice between the ecological responsibility and social and economic responsibility. While these three factors are all recognized as significant, the wording of the notice (specifically in section 219.8) consistently separates ecological from the grouped social and economic responsibility. A partial explanation may be derived from the following passage:

"The distinction between these two sets of requirements recognizes the Agency has more influence over the factors that impact ecological sustainability on NFS lands (ecological) diversity, forest health, road system management, etc.) than it does for social and economic sustainability (employment, income, community well-being, culture, etc.). National Forest System lands can provide valuable contributions to economic and social sustainability, but that contribution is just one in a broad array of factors that influence the sustainability of social and economic systems" (USFS 2011).

While I recognize the NFS's closer relationship with ecological sustainability, I believe this should make it all the more invested in social and economic sustainability. While this passage explains the logic behind choices to affect one aspect of sustainability, there is no direction to have the NFS involved a participatory agent or information provider in any direct action to affect social or ecological issues. Recognizing that these elements of sustainability are interconnected as the NFS clearly does, the NFS is a stakeholder in social and economic issues. This plan could be improved by including direction to the NFS on its role as an advocate; its efforts to collect and apply best available science may give it a unique edge in giving a voice to the most pertinent information and the goal of this plan and this organization could benefit by including express directions to do so.

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