

Analysis of the Role of Science in the Draft National Forest Management Act Planning

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The draft forest-planning rule acknowledges the important role of science as an underpinning of sound forest management to achieve Secretary Vilsack's vision and the mission of the Forest Service. Specifically, the opening overview of the draft rule states: *"The Forest Service Planning Rule serves as the primary tool to ensure that land management plans continuously provide desired ecosystem functions, contribute to social and economic sustainability, are rooted in the best available scientific information, and are developed with public input and participation."*

The narrative overview goes on to say, *"The proposed rule is very much a science-based rule and establishes a strong requirement for consideration and use of best available scientific information in planning. The proposed rule is based on some of the major recommendations from the 1999 Committee of Scientists report: sustainability, public participation and collaboration, adaptive management, monitoring and evaluation and the role of science [etc]."*

However, the rule does actually not require that forest plans use or even be consistent with the best available science. Rather, the draft rule only requires that the responsible Forest Service official merely consider the best available science and document their consideration of the science. Section § 219.3 Role of science in planning, states:

"The responsible official shall take into account the best available scientific information throughout the planning process identified in this subpart. In doing so, the responsible official shall determine what information is the most accurate, reliable, and relevant to a particular decision or action. The responsible official shall document this consideration in every assessment report (§ 219.6), plan decision document (§ 219.14), and monitoring evaluation report (§ 219.12)."

Non-scientific factors should be considered in developing a forest plan. However, only a forest plan based on the best available science has any chance of meeting its ecological sustainability objectives to restore and maintain forest and watershed health.

The requirement to merely consider the best available science means that management strategies might be pursued that are not based on any factual evidence that they will be effective.

Recommendation:

Include the provision for science consistency evaluations that currently exists in the 2000 planning regulations. Specifically, Section 219.24 requires that responsible official must ensure that plans are consistent with the best available science. The responsible official may use a science advisory board (Sec. 219.25) to assist in determining whether information gathered, evaluations conducted, or analysis and conclusions reached in the planning process are consistent with the best available science.