



Sustainable Forest Action Coalition

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**Participating
Representation from
the following:**

July 2, 2014

CALIFORNIA

- Amador
- Butte
- Calaveras
- Del Norte
- El Dorado
- Glenn
- Inyo
- Lassen
- Modoc
- Nevada
- Placer
- Plumas
- Sacramento
- Shasta
- Siskiyou
- Sierra
- Tehama
- Trinity
- Tuolumne
- Yuba

To: All SFAC Supporters

The SFAC has worked for over two years with staff from the Forest Service Region 5 Regional Office to bring awareness and a meaningful process to include social and economic input to all Forest Plan and individual project level NEPA decisions. The SFAC maintains that the Forest Service, in general, has not met their requirements as outlined in the NEPA law and subsequent CEQ regulations when it comes to analyzing the social and economic benefits of proposed projects or in their Forest Plans.

In general, there is a lack of comparison of the environmental versus social and economic benefits. When we review sections of the Council on Environmental Quality (CEQ) established by Title II of the NEPA Act, we find areas of concern over how NEPA project analysis is accomplished. We feel that the agency has taken a narrow interpretation of the “Human Environment”. CEQ defines Human Environment;

Sec. 1508.14 Human environment.

“Human environment” shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment. (See the definition of “effects” (Sec. 1508.8)

CEQ then defines effects;

Sec. 1508.8 Effects.

“Effects” include:

(a) Direct effects, which are caused by the action and occur at the same time and place.

OREGON

- Coos
- Curry
- Douglas
- Jackson
- Klamath
- Josephine
- Lake

NEVADA

- Nye

(b) Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Effects and impacts as used in these regulations are synonymous. Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.

All agency NEPA projects should provide a Purpose and Need statement in relation to Social and Economics (S/E). As discussed below, S/E is an element of most Forest Service NEPA documents that has been generally overlooked or deficient in content to truly be analyzed along with the environmental elements that are discussed in detail in all NEPA decisions.

If you look at Forest Service Manual, section 1920 Land Management Planning, there is a very important section that often plays second fiddle to all the resource issues on any given project and within the Land Management Plan. In most instances, there is only a fleeting reference to any specific social and economic discussion or analysis within the document. When you consider that there are hundreds of pages of information on environmental issues, it is no wonder that our counties and communities do not fair well with Forest Service projects. The specifics that I would like to discuss relate to:

1921.72 – Social and Economic Sustainability

The overall goal related to social and economic elements of sustainability is to contribute to sustaining social and economic systems that are affected by Forest Service management within the plan area (36 CFR 219.10(a)). For effective evaluation, the Responsible Official should identify and understand the social and economic systems related to the plan area.

1921.72a – Addressing Social and Economic Sustainability in Plans

The Responsible Official should collaboratively develop plan components to gain broad and diverse perspectives about sustaining social and economic systems in the plan area (see FSM 1921.6). In addressing contributions to sustaining social and economic systems in the plan, the Responsible Official should:

1. Establish desired conditions that contribute to sustaining social and economic systems using an interdisciplinary and collaborative approach;
2. Establish plan objectives, such as important roles and contributions the Forest Service can play, to achieve or maintain desired conditions; and
3. Establish performance measures to evaluate progress in achieving desired conditions.

1921.72b – Evaluating Contributions to Social and Economic Sustainability

In evaluating contributions to sustaining social and economic systems, the Responsible Official should:

1. For economic systems, consider the changing conditions and trends that affect relevant economic indicators such as employment, income, capital, housing, and fiscal health for important economic units such as individuals, households, industries, communities, regions, state and local governments, tribes, and the nation.
2. For social systems, consider the changing conditions and trends that affect relevant social indicators such as health, safety, and quality of lifestyle for important social units such as individuals, families, communities and the nation.
3. Consider how plan components contribute to sustaining social and economic systems.
4. Consider the performance of the plan components in achieving desired conditions for sustaining social and economic systems.
5. Periodically determine whether the plan components, especially the desired conditions, for contributing to sustainable social and economic systems remain valid.
6. Determine whether the evaluations indicate the need for change in the plan.

Given the fact that most public land forested geographic locations in California and Oregon have lost all of their capacity to economically treat products produced from Forest Service projects, it is time that the agency address the issue that this social and economic impact is having on their ability to accomplish projects. In addition, what these losses mean to the communities that the agency serves.

Just a few topics that need to be addressed to make a complete informed decision within NEPA documents in relation to forest health projects would be;

- Impact of reduced forest management and the effects on rural counties and communities;
- The loss of forest products infrastructure, both mills and biomass facilities, and how that loss affects the ability to economically accomplish projects
- What does each forest health project mean to the local workforce as far as number of jobs supported or created over current standards?
- Discuss the relationship between wages and benefits for mill/co-generation and woods workers to that of jobs related to recreation and tourism.
- Discuss not only the jobs created directly to forest and forest infrastructure, but also the indirect jobs that such job sustainability means to the communities.
- Discuss the Secure Rural Schools Act, its social and economic benefits to the counties and

communities. What has that meant in relation to the previous National Forest Fund (NFF) deposits and receipts before and after the decline in the timber supply. What is the declining scale and the impact in relation to the current President's budget and the proposal to go to zero in five years?

- Discuss the impact if you plan on using Stewardship contracts to accomplish the projects and the fact that there is not legal provision under that legislation to collect revenue generated from those contracts back into NFF.

A quick discussion of how the current social and economic situation that surrounded the most recent mill closures within the geographic area of consideration is worth discussing for consideration of providing a complete Social and Economic Analysis within all project documents.

Given all of the above, the SFAC and its Social and Economic (S/E) Sub-committee are now ready to take the lead with the California State University Chico Economic Development Department in cooperation with the Region 5 Regional Office, a series of Round-tables to further develop how S/E should be included and analyzed in all Forest Plans and individual NEPA projects. Attached are three documents that have been developed by the S/E sub-committee with CSU Chico and the Forest Service. The document titled "NE Socioeconomic Roundtable Proposal 06-27-14" is the most recent draft, but not yet complete. It does outline an Estimated Cost for each session. I feel that the estimate of \$30 per participant should be held to \$20 to encourage more participation. Given that difference, the estimate for each session would become \$7,100. Laurel and I have discussed that it is time for us, as your co-spokespersons, to request support for this important effort. Once S/E Purpose and Need and proper analysis is accomplished, it will finally provide the opportunity for all of our counties to become engaged and participate in the objection process as well as intervener status when necessary.

Donations to the cause will be run through the El Dorado County Chamber where Laurel serves as the CEO. We will do a monthly balance report and update at each of our five scheduled yearly meetings. If someone has a more appropriate suggestion, we are open. At this time we are asking for consideration of \$500 per County who supports the SFAC, or a \$100 contribution from individual businesses or individuals. When checks are made out, they should be to the El Dorado Chamber of Commerce and on the memo line indicate SFAC. You will see that all funding will go to cover expenses associated with the CSU Chico Economic Develop Department and direct expenses for the sessions. We are hoping to be able to hold the first session for the NE part of California and then a session more in the Central California region. It is also our desire to expand the effort into Southern Oregon after we have this same discussion during our August 22nd meeting with both the Region 5 and 6 Regional Office staff.

Thank you for your consideration.

Sincerely,



Bill Wickman and Laurel Brent Bumb
Co-Spokespersons for SFAC