# **USDA Forest Service** Climate Change Adaptation Plan 2014

# Forest Service Climate Change Adaptation Plan 2014 DRAFT

#### I. Policy Framework

#### Mission

The mission of the Forest Service (FS) is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations.

Americans rely on their forests and grasslands for a wide range of benefits—for provisioning services such as water, wood, and wild foods; for regulating services such as erosion, flood, and climate control; and for cultural services such as outdoor recreation, spiritual renewal, and aesthetic enjoyment. These services are connected and sustained through the integrity of the ecosystems on these lands.

#### **Goals and Strategic Approach**

FS policies, developed over many years, were mostly devised before the agency took climate change into account in its programs for public land management, private forest landowner assistance, and research. Such policies might not provide the most effective means for guiding actions to address climate change across broad landscapes, jurisdictions, and resource areas; however, these policies did consider establishing and maintaining resilient forests and rangelands in light of stressors. The FS is identifying shortcomings in its current policies, procedures, and program guidance. The goal is to reformulate them where necessary to align resources with an effective climate change response and to more effectively collaborate with other Federal agencies, States, Tribes, and other stakeholders for landscape-scale conservation.

The FS approach for adapting to climate change encompasses a) climate-specific strategies across the agency and b) direct program-by-program efforts to integrate climate-related policies and guidance, where climate change is one of many drivers of change to be considered in sustaining forest and grassland ecosystems. Climate-specific goals and strategies include:

- *USDA 2010-2015 Strategic Plan Goal 2*. Ensure our national forests and private working lands are conserved, restored, and made more resilient to climate change, while enhancing our water resources.
  - o Objective 2.2 Lead efforts to mitigate and adapt to climate change.
- FS National Roadmap for Responding to Climate Change (Roadmap). In October 2008, the FS had introduced a Strategic Framework for Responding to Climate Change. The Roadmap builds upon the strategic framework and lays out three types of actions for the FS to employ in a continuous cycle of adaptive management informed by monitoring and evaluation:
  - o **Assess** current risks, vulnerabilities, policies, and gaps in knowledge.
  - o **Engage** internal and external partners in seeking solutions.
  - o **Manage** for resilience, in ecosystems as well as in human communities, through adaptation, mitigation, and sustainable consumption strategies.

All three modes of action are dynamic and mutually reinforcing. They are interconnected through monitoring and evaluation, forming a continual feedback loop to allow opportunities for adjustment in direction or tactics.

- FS Climate Change Performance Scorecard (Scorecard) Individual National Forest System (NFS) field units apply the Scorecard to facilitate implementation of the Roadmap and USDA Strategic Plan. The Scorecard is completed annually in fiscal years 2011-2015. By 2015, each field unit is expected to answer Yes to at least seven of the Scorecard's 10 elements (questions), with at least one Yes in each of the four dimensions outlined below. The Scorecard's multiple dimensions ensure that each Unit works toward a balanced response to climate change. The four dimensions and ten elements are:
  - Organizational capacity Engage employees through training and integrate climate change into program of work.
    - 1. Employee Education
    - 2. Designated Climate Change Coordinators
    - 3. Program Guidance
  - Engagement Develop partnerships and transfer knowledge.
    - 4. Science and Management Partnerships
    - 5. Other Partnerships
  - o Adaptation Assess impacts of climate change and manage change.
    - 6. Assessing Vulnerability
    - 7. Adaptations Actions
    - 8. Monitoring
  - Mitigation and Sustainable Consumption Assess carbon stocks and reduce our Agency footprint.
    - 9. Carbon Assessment and Stewardship
    - 10. Sustainable Operations
- Executive Order 13514 Federal Leadership in Environmental, Energy, and Economic Performance. Directs each agency to not only develop a sustainability strategy and reduce greenhouse gas emissions but to develop policies and practices to support the Federal Adaptation Strategy. The Scorecard will simplify accomplishment reporting for this order.
- Executive Order 13653 Preparing the United States for the Impacts of Climate Change.

  Directs agencies to develop or continue to develop, implement, and update comprehensive plans that integrate consideration of climate change risks and vulnerabilities into agency operations and overall mission objectives.
- Forest Service Global Change Research Strategy 2009-2019. In keeping with the research goals of the U.S. Global Change Research Program, the FS Research and Development mission area helps define climate change policy and develop best management practices for forests (both rural and urban) and grasslands in order to sustain ecosystem health and services (adaptation), and

increase carbon sequestration (mitigation), all under changing climate conditions. The fundamental research focus of the FS Global Change Research Strategy is to increase understanding of forest, woodland, and grassland ecosystems, use this information to project potential futures. This information and the resulting tools will facilitate vulnerability assessments and the development of management practices to increase the probability of achieving projected futures that best meet the needs of the Nation.

The FS also incorporates climate considerations into program- or resource-specific policies and guidance. Examples include:

- Ecological Restoration and Resilience Directive (FSM 2020). The primary objective of this
  foundational policy for sustainable management of National Forest System (NFS) lands is to
  restore and maintain resilient ecosystems that will have greater capacity to withstand stressors
  and recover from disturbances, especially those under changing and uncertain environmental
  conditions, including climate change and extreme weather events.
- **2012 Planning Rule.** This new rule provides improved ability to respond to climate change and other stressors through an adaptive framework of assessment, planning and monitoring and new provisions intended to improve resilience of ecosystems on NFS lands. Examples include:
  - o 219.6(b)(3): "Identify and evaluate existing information relevant to the plan area for...the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change."
  - 219.12(a)(5)(vi): Monitoring programs must include monitoring questions and indicators that address "...measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area."
- Genetic Resource Management and Climate Change: Genetic Options for Adapting National Forests to Climate Change. This strategy provides an overview of current climate change knowledge and potential implications for forest tree species, as well as goals, principles, and recommendations for enhancing forest resilience and resistance through a re-aligned "climate-smart" NFS Genetic Resource Management Program.

#### II. Planning for Climate Change Related Risk

Section 5(a) of E.O. 13653 states that, "each agency shall develop or continue to develop, implement, and update comprehensive plans that integrate consideration of climate change into agency operations and overall mission objectives..." The five elements (subsections) are addressed in the remainder of this Plan.

Section 5(a)(i) - identification and assessment of climate change related impacts on and risks to the agency's ability to accomplish its missions, operations, and programs;

#### Impacts, Risks, and Vulnerability Assessment

The FS uses numerous national, regional, and local scale assessments to inform policies, programs, and land management planning of the impacts of climate change and other environmental stressors and influences. Examples include the Forest and Rangeland Renewable Resources Planning Act Assessment; National Climate Assessment – Forest Sector Report; Southern Forest Futures Assessment; and NFS land management plan assessments.

- Physical and Biological Climatic Concerns. The FS mission is impacted by shifts in temperature and precipitation patterns and amounts, extreme weather events, and climate variability. The FS manages public forests and grasslands and works with States, Tribes and private landowners to restore and sustain the health, diversity and productivity of the Nation's forests and grasslands. Changes in key climate variables affect the seasonality of hydrologic regimes, reproduction cycles of pests and pathogens, and length of fire seasons. Fire seasons in the West have increased by 78 days since the mid-1980s. Disturbance facilitates the introduction and spread of invasive species, which increase extinction risks for native species and other alterations of ecosystem processes and functions. The changing climate is already altering species ranges and has the potential to alter ecosystem structure in the future as evidenced by the mountain pine beetle (a native insect) epidemic in the West. Management will require forward-looking approaches to novel ecosystems instead of depending on historical ranges of variability. These impacts pose challenges to sustaining forests and grasslands and the supply of goods and services upon which society depends, such as clean drinking water, forest products, outdoor recreation opportunities, and habitat.
  - O Wildfires Increasing wildfire season length and extent of fire on the landscape. Research estimates the potential for up to 100 percent increase in the number of acres burned annually by 2050. Increasing wildfire response requires increased funding. Fire suppression funding has grown from 16% of the FS budget in 1995 to 42% currently and funding is transferred from other agency programs in years when suppression funds are exhausted.

All FS program accomplishments are reduced when wildfire suppression funds are exhausted. The increased extent of high severity fire on the landscape coupled with communities expanding into in the wild land-urban interface are reducing capacity to provide other services, including increasing the residence of ecosystems, and puts personnel, the public, communities, and infrastructure at higher risk.

Tribal communities and firefighting- NFS lands and bordering tribal lands are increasingly at risk of fire. Tribes are particularly vulnerable to fires both on and off tribal lands (e.g., on NFS and/or private lands over which they have no control or jurisdiction) which complicates coordination of firefighting across shared landscapes with such frequent fires. These risks are frequently exacerbated by a lack of adaptive capacity due to lack of resources, poverty, poor or nonexistent infrastructure, and relative isolation.

Human Health and Safety – Firefighting employees and contractors, and residents in the wild land-urban interface are increasingly at risk due to extreme wildfire behavior.

- Air Temperature Prolonged personnel exposure to the elements during extreme temperatures. Human health and safety Risk to employees and contractor/cooperators. Events that include atypical weather patterns experienced during the 2013-2014 winter season has result in extremely cold temperatures in most regions, especially unusual in the southern states. Higher summer temperatures may increase field personnel risk of heat exhaustion, heat stroke, and dehydration. Has the potential to impact operations at all levels.
- Insects and Disease Increased exposure to and spread of damaging insects and disease, especially invasive species. Affects natural resource management on all lands. Tribal

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<sup>&</sup>lt;sup>5</sup> Westerling, Hidalgo, Cayan, and Swetnam. 2006. Science 313: 940-943.

- communities and Forest Health NFS and bordering tribal lands are increasingly at risk of damaging insects and disease.
- Water Temperature Increased water temperatures in rivers and lakes, lower water levels in late summer, and drying of streams and ponds. Tribal communities and Watershed, Fish, Wildlife, Air and Rare Plants—Forest Service and bordering tribal lands are increasingly at risk regarding watershed and fisheries maintenance. Tribes are particularly vulnerable to fluctuations in water temperatures and flow as many communities rely on aquatic species for subsistence and cultural purposes. These risks are frequently exacerbated by a lack adaptive capacity due to lack of resources, poverty, poor or nonexistent infrastructure, and relative isolation. A further consideration is that failure to manage trust lands in a sustainable manner may result in abrogation of treaty rights, creating a risk position for federal natural resource agencies.
- o Rising Sea Levels Tribal communities, NFS lands, infrastructure. Coastal NFS lands and coastal Tribes are increasingly at risk of damage to their lands, including infrastructure, due to rising sea level. Tribes are particularly vulnerable to see level rise as many tribal communities are place-based, with limited or no opportunity to relocate without extreme cost and/or Congressional action. Those tribes that rely on aquatic species for subsistence and cultural purposes that are affected by sea level are further at risk. These risks are frequently exacerbated by a lack adaptive capacity due to lack of resources, poverty, poor or nonexistent infrastructure, and relative isolation. A further consideration is that failure to manage trust lands in a sustainable manner may result in abrogation of treaty rights, creating a risk position for federal natural resource agencies.
- Extreme Weather Events Impact to agency facilities, operations, and emergency response capability as a result of severe weather conditions. Affects all agency operations and programs. Past events such as Hurricanes Katrina and Irene had significant impact to infrastructures and personnel. Because FS has employees in all states, there is a high probability that a major function could be impacted by such weather events, requiring those offices to transfer duties until they can relocate to their COOP facility and get up and running.
- o **Increased Rainfall Transportation infrastructure concerns.** With increasing heavy rain events, the extensive road system on NFS lands will require increased maintenance and/or modification of infrastructure (e.g. larger culverts or replacement of culverts with bridges).
- o Fluctuating Precipitation and Temperature Outdoor recreation and recreation infrastructure. Ski areas, reservoirs, and campgrounds are strongly influenced by past and current climate. Preserving high-quality outdoor recreation experiences will depend not only on the condition of the land, facilities, and transportation infrastructure but also on where such opportunities can be accommodated safely and managed under a changing climate. The projected increase in U.S. population and the continual decline of public access to privately-owned undeveloped land will increase demand for recreation opportunities on public land.
- *Economic and Marketing Concerns*. Climate change may influence the demand for energy and its mix of sources. Woody biomass is gaining attention as a renewable energy source. An increasing demand for renewable energy may affect how forests are managed and influence a wide range of ecosystem services, such as water quantity and quality, wildlife habitat, and carbon sequestration. Changes in forest management objectives could affect the price of traditional forest products and downstream products such as housing.

Management options to maintain healthy ecosystems include thinning stands to reduce moisture stress and regenerating stands where they have been decimated by insects or disease. Having a market for products from these operations is important to offset management costs and improve local/rural economies. Because of the demise of the forest industry in many areas, a major marketing effort will be necessary to reestablish mills and processing plants.

Potential impacts to other ecosystem services also may affect social and economic sectors. For example, climate change may adversely affect river-based outdoor recreation opportunities through changes in the timing and volumes of streamflow; thereby impacting many rural communities dependent on favorable water flow and a river based economy.

The economic benefits of outfitting and guiding and river-related recreation use are large contributors to local and rural economies where rivers are large enough to support such economies. They should be recognized just as are reservoir operations and other developed recreation opportunities (campgrounds) along riverways.

• *Capacity Building*. The FS provides a wide variety of climate change training opportunities and communication materials for its employees, other agencies, and the public. These range from basic awareness education to highly technical seminars, workshops, and courses for conducting vulnerability assessments and developing adaptation and mitigation strategies.

Partnerships between scientists and land managers are being strengthened to improve the focus of research and technology to address current and emerging science and information needs. Resource inventory, monitoring, and assessment activities and decision support tools are being better aligned and coordinated across FS programs and with partner agencies at multiple scales. Examples of ongoing and newly initiated capacity-building efforts are:

- Climate Change Resource Center The primary web-based science delivery portal for FS
  employees and partners who need information and tools to address the impacts of climate
  change in land management decision making.
- Environmental Threat Assessment Centers (Eastern Forest Environmental Threat
   Assessment Center and Western Wild land Environmental Threat Assessment Center) Provide interdisciplinary resources that are actively developing new technology and tools to
   anticipate and respond to forest threats, including climate change.
- Regional Hubs Seven regional hubs now established across the US. They are repositories of data and offer practical, science-based tools and strategies farmers, ranchers, and forest land owners need to adapt and succeed in the face of a changing climate. The Hubs will provide outreach and information to producers on ways to mitigate risks; public education about the risks climate change poses to agriculture, ranchlands and forests; regional climate risk and vulnerability assessments; and centers of climate forecast data and information. They will also link a broad network of partners participating in climate risk adaptation and mitigation, including universities; non-governmental organizations; federal agencies such as the Department of Interior and the National Oceanic and Atmospheric Administration; Native Nations and organizations; state departments of environment and agriculture; research centers; farm groups and more.
- Conservation Education Programs Increase environmental literacy through partnerships
  with groups who educate urban populations on the value of well-managed public and private
  forested lands and, through natural resource stewardship, improve the public's quality of life.

Frequency of extreme events and more climatic variability will challenge stewardship programs that directly benefit urban dwellers.

#### Framework to Continually Review and Update Impact Assessment and Risk Determination

Understanding Risks – Actions the FS takes to better understand risks and opportunities.
 Management of forests and grasslands and associated resources involves making long-term commitments of resources and investments. The FS continues to refine its planning and decision making processes regarding the consideration of climate change risk and uncertainty. In January 2009, national guidance was developed for the NFS to address climate change in land management planning and project-level National Environmental Policy Act (NEPA) analyses. The 2012 Planning Rule and forthcoming directives and guidance are updating that initial guidance.

Agency research scientists work closely with land managers to downscale climate projections to better understand the range of potential ecosystem impacts, conduct vulnerability assessments for key resources, and develop localized adaptation approaches and options. For example, vulnerability assessments for water resources and aquatic ecosystems were recently completed on 12 national forests, representing each of the nine FS regions. Likewise, two regions have completed risk assessments of their forest tree species. These serve as pilots for completing additional assessments. Also, comprehensive risk assessments are being completed when planning recreation infrastructure projects; and a risk assessment of all developed recreation sites was conducted recently to identify and mitigate public safety issues related to extreme weather events.

In cooperation with national, state, and local partners, urban forest health monitoring efforts of the FS are underway to identify existing and potential pest and disease threats to our urban forests and help understand the impact of climate change on the vulnerability of urban forests to infestations.

All NFS unit level land management planning and project planning involves collaboration with the public and key partners such as Tribes and local governments. The FS is engaged with Department of Interior and State agencies in using the newly formed Landscape Conservation Cooperatives (LCCs), Climate Science Centers, and USDA Regional Hubs to coordinate sharing of resource information and science and developing adaptation strategies across these broader landscapes.

Following are example policies, programs, processes, and actions that provide frameworks for regularly monitoring and assessing risks and vulnerabilities:

- Forest and Rangeland Renewable Resources Planning Act (RPA) Assessment every 10 years
- o National Climate Assessment Forest Sector Report every four years
- o Regional assessments, such as the Southern Forest Futures Assessment.
- o National Cohesive Wild Land Fire Management Strategy
- o Collaborative Forest Landscape Restoration Program (CFLRP) monitoring

- Forest Health Monitoring Program Determines the status, changes, and trends in indicators
  of forest condition on an annual basis and, in a federal/state partnership, produces the
  National Insect and Disease Risk Map every 5-6 years.
- NFS Land Management Planning Monitor and assess regularly. Revise plans every 10-15 years, including consideration of changes in environmental, social and economic conditions and stressors.
- Watershed Condition Framework assess conditions every four years
- o Continuity of Operations (COOP) Plans
- o FS Health and Safety Program
- Sustained Adaptation Process. The Climate Change Advisor's Office will lead the Adaptation Plan's review, monitoring of actions listed in the appendix, and Plan update. Monitoring of resource conditions and trends with input from FS Research and Development, field units, other agencies, and stakeholders will inform prioritization or adjustment of national policies and programs.

Climate Change Performance Scorecard annual reporting will track progress on implementing major actions of the Roadmap and this Adaptation Plan. Improvement in Scorecard results will reflect effectiveness of agency strategic approaches, policies, this Adaptation Plan, and other efforts within the FS and by partners. The Scorecard itself will also be reviewed regularly to ensure it continues to meet the agency's needs, with potential to expand its application to other mission areas.

The *Adaptation Services Framework*, a State & Private Forestry companion to the Performance Scorecard is being developed.

National and regional assessments will continue to monitor the health and productivity of the Nation's forests and rangelands. Examples include:

- o Forest and Rangeland Renewable Resources Planning Act (RPA) Assessment
- National Climate Assessment Forest Sector Report
- Southern Forest Futures Project
- Northern Forest Futures Project.

The 2012 Planning Rule requires national forests and grasslands to monitor progress towards their desired conditions and including key indicators of ecosystem status and measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.

Section 5(a)(iii) - a description of how any climate change related risk identified pursuant to paragraph (i) of this subsection that is deemed so significant that it impairs an agency's statutory mission or operation will be addressed, including through the agency's existing reporting requirements;

- Impact/Risk Considered Significant. Increasing wildfire season length, size and severity of large fires, coupled with an expanding wildland-urban interface, has been multiplying wildfire suppression costs. Fire suppression funding has grown from 16% of the FS budget in 1995 to 42% currently and funding is transferred from other agency programs in years when suppression funds are exhausted.
  - All FS program accomplishments are reduced when wildfire suppression funds are exhausted. The increased extent of high severity fire on the landscape coupled with communities expanding into in the wild land-urban interface are reducing capacity to provide other services, including increasing the residence of ecosystems, and puts personnel, the public, communities, and infrastructure at higher risk.
- Rationale for Classifying the Risk as Significant. Wildfire suppression expenditures are now a significant percentage of the agency's budget, reducing capabilities to provide other critical services, including our capacity to manage forests for increased resilience, to protect their capacity to sequester and store carbon, and provide other ecosystem services. Increasingly large and severe wildfires will result in increased restoration needs as well as decreased capacity to manage for other services. They also increase risk to personnel and communities.
- Action(s) that may decrease the threat/risk. Change funding mechanism for wildfire suppression to protect funding of programs and activities that restore fire-adapted ecosystems, resilience, and accomplish other adaptation priorities. The FLAME Act of 2009 established a separate account for funding emergency wildfire suppression activities undertaken on DOI and NFS lands. Additional legislation is being considered (Wildfire Disaster Funding Act of 2013 HEN13D10).
- Can the action be addressed exclusively by the agency or do others need to be involved? Congressional action is required to change funding structure.

Section 5(a)(iv) - a description of how the agency will consider the need to improve climate adaptation and resilience, including the costs and benefits of such improvement, with respect to agency suppliers, supply chain, real property investments, and capital equipment purchases such as updating agency policies for leasing, building upgrades, relocation of existing facilities and equipment, and construction of new facilities;

FS Engineering and Watershed programs are developing national guidance to ensure flood emergencies are appropriately responded to and infrastructure is rebuilt to be more flood resilient. This guidance includes FS Manual and Handbook direction and development of incident command procedures. This is being coordinated with the USFWS, NRCS, BLM, USACE, and State Department.

Section 5(a)(v) - a description of how the agency will contribute to coordinated interagency efforts to support climate preparedness and resilience at all levels of government, including collaborative work across agencies' regional offices and hubs, and through coordinated development of information, data, and tools, consistent with section 4 of this order;

The FS supports coordinated climate adaptation efforts through its substantial contributions of science, data, information, tools, and technical support to Federal, State, and local agencies; Tribes; the business sector and producers; other partners and stakeholders; and the international community. Examples include:

- Regional Hubs: FS is host to five of the seven USDA regional hubs recently established. These provide outreach and information to producers (farmers, ranchers, and forest land owners) on ways to mitigate risks; public education about the risks climate change poses to agriculture, ranchlands and forests; regional climate risk and vulnerability assessments; and centers of climate forecast data and information. They will also link a broad network of partners participating in climate risk adaptation and mitigation, including universities; non-governmental organizations; federal agencies such as the Department of Interior and the National Oceanic and Atmospheric Administration; Native Nations and organizations; state departments of environment and agriculture; research centers; farm groups and more
- Western and Eastern Environmental Threat Assessment Centers
- Climate Change Resource Center (www.fs.fed.us/ccrc)
- Forest Service Global Change Research Strategy 2009-2019
- Interagency Coordination on Climate Projections
- Inventory, Monitoring, and Assessment Strategy
- Watershed and Terrestrial Condition Frameworks for integrated resource restoration
- Genetic Diversity
- National Cohesive Wild Land Fire Management Strategy
- National Fish, Wildlife and Plants Climate Adaptation Strategy
- FS is an active partner in Landscape Conservation Cooperatives and is lead agency for the Caribbean LCC.
- Tribal support through:
  - o National Fish, Wildlife and Plants Climate Adaptation Strategy, Landscape Conservation Cooperatives, and other interagency efforts.
  - o Tribal Climate Change Network and FS Regional Climate Hubs
  - o Backstop tribal representatives on the White House/CEQ climate task force.
  - Tribal Climate Change Adaptation Community of Practice (FS, White House, DOI's BIA and USGS, DOE, EPA, and CEQ)
  - o Inter-Agency Forum on Climate Change Impacts & Adaptations.

Section 5(a)(ii) - a description of programs, policies, and plans the agency has already put in place, as well as additional actions the agency will take, to manage climate risks in the near term and build resilience in the short and long term;

FS actions already completed, initiated, or proposed in response to climate-related impacts and risks (Section 5(a)(ii) are described in the Action Register below. In addition, the Action Register describes in greater detail those FS actions that contribute to interagency efforts to support climate preparedness and resilience, including coordinated development of information, data, and tools (Section 5(a)(v).

# Executive Order 13653, Sec. 5 - Federal Agency Planning for Climate Change Related Risk USDA Forest Service Action Register

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Inter- Governmental Coordination	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Implement the USDA-	Integration of	Climate	Natural resources, FS mission	Local,	Ongoing	Through various	Percent of	Increased		Need to	Roadmap and
Forest Service (FS)	climate	Change	and operations are broadly at	summarized		means, including	National Forests	collaboration such		improve	Scorecard issued
Climate Change Roadmap	change	Advisor's	risk	at Regional		policy	in compliance	as sharing of		scorecard	in 2011.
and Performance	response into	Office		and		formulation, and	with a climate	science, data, and		guidance;	
Scorecard	the agency's		Roadmap identifies ongoing	National		science support	change	tools,		limitations of	By end of
	policies,		actions and establishes short	levels		at national,	adaptation and			field units to	FY2013, 49% of
	programs, and		and longer term strategic			regional, and	mitigation			conduct	NFS units have
	operations.		actions and investments to			local levels.	strategy			vulnerability	met the
			respond and adapt to climate							assessments.	performance
			change.				Annual reporting				scorecard target.
			Performance Scorecard tracks				by field units on				
			progress implementing the				implementing at				
			Roadmap by individual				least seven of				
			national forests and				ten scorecard				
			grasslands.				elements by end				
							of FY2015.				

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Inter- Governmental Coordination	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Develop Adaptation	Adaptation	Climate	Opportunity to collaboratively	National,	Draft	The deliverable	Publication of				Framework
Services Framework	integrated into	Change	develop and provide a system	but may	Framework in	would be the	the S&PF				Proposal drafted
	S&PF	Advisor's	to evaluate and adapt State &	include	development.	S&PF	Adaptation				and currently
	program and	Office, S&PF-	Private Forestry programs and	region-	Final in	counterpart to	Services				under internal
	service	NA	policies in the delivery of	specific	December	the NFS Climate	Framework and				review.
	delivery,		climate change services to	goals and	2014	Change	Guidance				
	improving		partners (non-Federal forest	guidance.		Performance	Document				
	assistance to		managers, landowners and		Northeast	Scorecard.					
	forest		urban communities).		Area pilot in						
	landowners				FY2015 along						
	and managers,				with updated						
	allowing them				S&PF						
	to continue to				program						
	meet their				guidance. FS-						
	unique				wide						
	management				implementatio						
	objectives in a				n of						
	changing				Framework						
	climate				reporting in						
					FY2020.						

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Inter- Governmental Coordination	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Develop national policy	Entire FS will	Office of	Significant impact to	National,	Ongoing	WO will provide		Yes. Coordinate	Personnel time		The WO and
requiring the entire agency	have COOP	Safety and	facilities, other infrastructure,	Regional,		template to		with local	required to		several regional
to develop COOP plans to	Plans to	Occupational	and agency operations,	Locals		create COOP		agencies, esp	develop new		offices currently
ensure operability	implement in	Health	including emergency			plans by October		regarding	COOP plans		have COOP
continues when impacted	the event of an		response, as a result of			1, 2014. Once		continuity of FS			Plans.
by an extreme weather-	emergency		extreme weather events			created, plans		emergency			
related event.	requiring					will be		response			
	relocation to					reviewed/		assistance.			
Administrative units	an alternate					updated at least					
develop COOP Plans to	operating					yearly or when					
ensure facilities have	facility,					procedures					
continuing operating	devolution of					change and					
capabilities if vulnerable	functions, etc.					warrant an					
to extreme weather events.						immediate					
						update.					

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Inter- Governmental Coordination	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Safety Training: Train employees on proper procedures for working in and surviving extreme weather conditions, such as prolonged exposure to extremely high or low temperatures, precipitation, and wind	protect	Safety and Occupational Health	Human Health and Safety - Prolonged employee exposure to the elements during extreme high and low temperatures, potential flooding, or high wind events.	National, Regional, Local	Ongoing	Evaluations will be done during the WO assessments					USFS OSOH currently has procedures and policies to ensure employees understand hazards associated with prolonged exposure to extreme weather conditions as outlined in the Health and Safety Code Handbook, FSH 6709.11.
Develop Flood Response guidance and teams		Engineering/ Watershed	Increased risk of flooding. Opportunity to create flood response guidance and teams to assist forest and non- forest lands in flood emergencies	and International	December 2014	Guidance, manual handbook direction and development of incident command procedures		USFWS, NRCS, BLM, USACE, State Department			Stream Simulation Design development

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Inter- Governmental Coordination	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Issue Ecological Restoration and Resilience Policy (FSM 2020)	Provides foundational policy for sustainable management of NFS lands.	Forest Management	Addresses all risks and vulnerabilities of ecosystems and associated infrastructure. Objective is to restore and maintain resilient ecosystems that will have greater capacity to withstand stressors and recover from disturbances, especially those under changing and uncertain environmental conditions, including climate change and extreme weather events.	National	Finalize directive in May 2014	Issue directive		USFWS and other federal land management agencies		integrating the policy into other agency policies and programs	Interim directive first issued in September 2008; reissued in 2010 2011,and 2013; Proposed directive published in Federal Register
	National Forest System (NFS) land management planning policy and procedures include consideration of climate change	Ecosystem Management Coordination	Prior rule was out of date. Revised process for establishing, amending and revising land management plans for national forests and grasslands. Incorporates consideration of climate change into land management plans through assessments and monitoring.	National		developing new approaches,	under the 2012	Coordinated with CEQ, OMB, DOJ, EPA USFWS, and NOAA Fisheries		lawsuits filed	Planning Rule finalized March 2012

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Inter- Governmental Coordination	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Directives (FSM 1920 and FSH 1909.12)	NFS units will have land management plans that provide long term direction for climate change adaptation and mitigation address the impacts and risks of climate change.	Ecosystem Management Coordination	Opportunity to incorporate climate change adaptation guidance into 2012 Planning Rule directives. Will ensure consideration of climate change when NFS units revise their land management plans.	National		Issuance of directives to field units.		Coordinating with CEQ, OMB, DOJ, EPA USFWS, and NOAA Fisheries		community on estimating uncertainty and	Addressing 17,449 public comments on proposed planning directives.
Revise National Forest and Grassland Land	LMPs are "climate-smart."	Ecosystem Management Coordination	Older LMPs may not reflect new science and information on risks to sustainable ecosystems and communities from impacts of stressors, including climate change. For plans under the 2012 Planning Rule, assessments should evaluate vulnerability of key resources related to LMP decisions. As LMPs are revised, climate adaptation strategies are developed and incorporated as needed.	Local	Unit LMPs are revised under the 2012 Rule and directives	planning process implemented by individual or	revised annually under the 2012 Planning Rule.	intergovernmental coordination occurs at the scale of national forests, states and regions in preparation of these plans.	limitations and collaboration slow the pace of LMP revisions. Insufficient field resources to complete revisions.	meeting complex planning requirements. Controversy and litigation that drags out LMP revision	Baseline carbon assessments completed for each NFS unit. Publication of proposed final plans and Final EISs for 6 plan areas in the last 8 months.

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Lanvarnmantai	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Practices Directive (FSM 2470)	1	Management	Opportunity to provide direction and guidance on ecological restoration, management at landscape scale, and managing for climate change.	National	Finalize in FY 2014	Issuance of directive to field units.	Final directive is issued.	None		handbook needs revision to reflect changes made in directive.	Draft directive completed with collaboration from R&D and S&PF. Final draft submitted to ORMS for review and publishing.

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Inter- Governmental Coordination	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Implement National	Landscapes	Fire and	Increasing wildfire season	National,	Ongoing.	Strategy being		Wild land Fire			Phases I and II
Cohesive Wild Land Fire	are more	Aviation	length, severity, and extent of	Regional		implemented in	Strategy Goals	Leadership			completed.
Management Strategy		Management	fire on the landscape.		Phase III of	three phases.		Council (WFLC),			
	communities				plan to be	Restoration	Measures_being	representing FS,			
	are adapted to		Risk reduction - Addresses the		finalized in	component	developed. Five-	DOI, States,			
	fire, fire		nation's wildfire problems by		FY 2014	involves	year review	Tribes, and local			
	personnel		focusing on three key areas:			establishing	cycle to provide	agencies			
	have safe		Restore and Maintain			resilient fire-	updates to				
	areas to work		Landscapes, Fire Adapted			adapted	Congress.				
	within		Communities, and Response			ecosystems,					
			to Fire.			which would					
						also be better					
						adapted to the					
						effects of					
						climate change					
						and other					
						stressors.					
						Implement					
						through					
						programs and					
						projects, in					
						collaboration					
						with partner					
						agencies, Tribes,					
						landowners.					

Action Description	Action Goal	Agency Lead	Risk/Opportunity Description	Scale	Timeframe	Implementatio n Methods	Performance Metrics	Inter- Governmental Coordination	Resource Implications	Challenges/ Further Implications	Highlights of Accomplishme nts to Date
Implement National Fish,	Landscapes	Watershed,	Opportunity to improve	National	2014	Review agency	Crosswalk	Joint			JIWG
Wildlife and Plants	are more	Fish, Wildlife,	efficiency and effectiveness			programs and	established	Implementation			established
Climate Adaptation	resilient,	Air, and Rare	by identifying FS goals and			strategic plans	between FS	Working Group			
Strategy (NFWPCAS) and	maintain	Plants	strategic actions that can be			and NFWPCAS	goals and	(JIWG)			
FS goals	function and		implemented in alignment				strategic actions				
	productivity		with NFWPCAS				and NFWPCAS				
							goals, strategies,				
							and actions.				

Increase the pace of	Landscapes	Forest	Risk reduction - Initiative lays Lo	2001	Ongoing.	On-the-ground	FS annual	FS and NRCS are	Rudget	Phase II of the	Restoration
restoration on NFS lands	Lanuscapes	Management	out a series of ongoing and	Jean		-	restoration			Restoration	accomplishment
lestoration on NFS railus		Management				resource					
	resilient so as		future actions related to the		FY 2012-2015	-	performance			Strategy to	s from 23
	to maintain		use of active forest			treatments	metrics	1			Collaborative
	function,		management as one important				(Resiliency	needed restoration		Secretary	Forest
	productivity,		tool to maintain and restore				Measure)			requesting	Landscape
	and adaptive		the functions and processes				FY 2014 target	forest/private land	accomplished	department	Restoration
	capacity.		characteristic of healthy,				is 2.7 million ac	boundaries		support,	Projects
			resilient forests and							included	
			watersheds. Many of these							advocating	A team has been
			actions also support							expanding	developing
			adaptation of ecosystems to							Good Neighbor	
			climate change.							Authority and	performance
										reauthorization	
										of Stewardship	expected to be
										Contracting.	included in FY
											16
											Congressional
											Budget
											justification in
											July. 2014.
											Put in place 3
											new categorical
											exclusions for
											soil and water
											projects.
											r-sjeen.
											Acres treated:
											FY 2012: 2.56
											million ac;
											FY2013: 2.5
											million ac

Implement Western Bark Beetle Strategy (NFS lands)	Improve 1) human safety, 2) forest recovery, and 3) long-term forest resilience	Forest Management	Risk reduction - Addresses the West's bark beetle problems by focusing on three goals: human safety, forest recovery, and long-term forest resiliency. Removal of standing or dead hazardous trees near roads, along trails, and in campgrounds is top priority. The strategy is restoring healthy forest ecosystems in beetle-killed areas through planting appropriate species and thinning.	the strategy covers	2016	Through FS programs and projects, in collaboration with state governments.		FS works in collaboration with state governments in the Western States.	limitations	Limited markets for dead trees; litigations are on-going challenges.	FY11-FY13: 85,0703 acres treated; 3,838 miles of roads and trails had hazard trees removed; 851.4 MBF of timber and 410,823 tons of biomass were produced. FS spent \$321.3 M supporting safety, recovery and resiliency
Implement National Strategic Tree Planting Initiative	Dual goals: Increase community resilience and sequester and store carbon.	Cooperative Forestry	Risk reduction - Establish tree planting projects in urban and community forests to increase the amount of carbon sequestered and carbon emissions avoided. Also helps communities adapt to increasing temperatures by increasing cooling effect and other ecosystem services provided by urban trees.		Ongoing. FY 2012-2015	Through programs and projects, in collaboration with partner organizations and communities.	Number of trees planted. Amount of carbon sequestered and emissions offset per federal dollar invested		Initiative made possible by a Cooperative Agreement in 2012 with Arbor Day Foundation. No other funding resource needs are anticipated at this time.		activities  Currently nine electric utility companies participate in the program with nearly 17,000 trees planted in the fall of 2013.

		Research &	Opportunity - Promote and	National	Ongoing		Percent	Collaborate on		
Promote wood as a green	Supports dual	Development	seek recognition by the U.S.	rational	Oligoling		completion of	changes in		
	goals of	Development			FY 2012-2014		Life Cycle	certification		
building material (FS)			Green Building Council and others of the environmental		F1 2012-2014			ceruncation		
	adaptation and						Inventory (LCI)			
	mitigation.		benefits of wood building				wood database			
	Increases		products. Supports restoration				update for Life			
	utilization of		of forest ecosystems to make				Cycle			
	wood to help		them more resilient to climate				Assessment			
	facilitate		change and other stressors,				(LCA) use and			
	ecological		while mitigating climate				EDP			
	restoration and		change through wood's				establishment			
	adaptation		substitution for energy-				for wood			
	activities.		intensive building materials.				products to meet			
							Green Building			
							standards			
Wood To Energy	Supports dual	Cooperative	Opportunity to create and	National	Ongoing	Grant Program	Metric Tons		Budget	
	goals of	Forestry	expand markets for small-						limitations	
	adaptation and		diameter material and low-							
	mitigation.		valued trees removed from							
	Increase		forest restoration activities.							
	utilization of		Grant funds are targeted to							
	wood to help		help communities,							
	facilitate		entrepreneurs, and others turn							
	ecological		residues into marketable forest							
	restoration and		products and/or energy							
	adaptation		products. Products help fund							
	activities.		treatments that restore							
	activities.		resilience of forests to							
			stressors, including climate							
			change							
						ĺ	1			

	Contributions to Coordinated Interagency Efforts, Including Development of Information, Data, and Tools														
Implement Forest Service	Provide	Research &	Fundamental research focus of National	Ongoing	Research,	Broad diversity	Coordinates with	Budget							
Global Change Research	science that	Development	the FS Global Change		publications and	of research	USGCRP	limitations							
Strategy 2009-2019	supports		Research Strategy is to	FY 2009-2019	other technology	products									
	adaptation		increase understanding of		transfer	including peer-									
			forest, woodland, grassland,		activities	reviewed									
			and urban ecosystems so they			publications,									
			can be managed to sustain and			number of tools									
			provide ecosystem services			developed,									
			for future generations.			customer-									
						satisfaction									
						surveys and									
						science delivery									
						efforts, such as									
						workshops.									

Forest and Rangeland	Provide	Research &	Publication: Future of	National,	Ongoing -	Conduct	Research	Useful to other		2010 RPA
Renewable Resources	science to	Development	America's Forests and	Regional	every 10 years	assessment.	publications	agencies, land		Assessment
Planning Act (RPA)	inform policy,	_	Rangelands: Forest Service			Distribute/post		managers, and		published in
Assessments	including		2010 Resources Planning Act			publications		sectors		2012
	adaptation		Assessment							
	1									
			This scientific assessment							
			provides a snapshot of current							
			U.S. forest and rangeland							
			conditions and trends on all							
			ownerships, identifies drivers							
			of change, and projects							
			conditions 50 years into the							
			future. Includes analyses of							
			forests, rangelands, wildlife							
			and fish, biodiversity, water,							
			outdoor recreation,							
			wilderness, urban forests, and							
			the effects of climate change							
			on these resources.							

			Publication: Effects of Climatic Variability and		Ongoing - every four	Conduct assessment.	Research publication	Useful to other agencies, land		Forest Sector Report published
	inform policy,	Development	Change on Forest	Regional	years	Distribute/post	publication	managers, and		in 2012
-	including		Ecosystems: A Comprehensive			publication		sectors		
	adaptation		Science Synthesis for the U.S.							
			Forest Sector.							
			A scientific assessment of current condition and likely future condition of forest resources in US relative to climatic variability and change. Assessment provides technical input to the NCA and serves as a framework for managing forest resources in the US.							

Establish regional climate	Support	Research &	Hubs will provide outreach	Regional /	Ongoing	Work through	In startup, but	Yes, within	No additional	Limited	Hubs now
hubs for risk adaptation	adaptation by	Development,	and information to producers	Landscape,		existing USDA	initially will	USDA. Will also	funding for	resources	established.
and mitigation to climate	providing	USDA CCPO	on ways to mitigate risks;	Local		programs.	examine the	link a broad	this initiative		
change. FS hosts five of	information		public education about the				processes	network of			
the seven hubs.	and technical		risks climate change poses to				involved in	partners			
	advice needed		agriculture, ranchlands and				vulnerability	participating in			
	by producers		forests; regional climate risk				assessments and	climate risk			
	(farmers,		and vulnerability assessments;				implementation	adaptation and			
	ranchers, and		and centers of climate forecast				of management	mitigation,			
	forest land		data and information.				actions	including			
	owners).							universities; non-			
								governmental			
								organizations;			
								federal agencies			
								such as DOI,			
								NOAA, Native			
								Nations and			
								organizations;			
								state departments			
								of environment			
								and agriculture;			
								research centers;			
								farm groups and			
								more			

Implement Inventory,	Provide	Ecosystem	Opportunity to improve	National,	Ongoing	Policy changes	TBD - IM&A	Coordination with		Effectively	Drafted National
Monitoring, and		Management	resource inventory,	Regional,			Strategy	other federal,			Management
Assessment Strategy	and	Coordination	monitoring, and assessment.	Local		information	scorecard	state and local		large number of	
	assessment		Goal is for land management			management	metrics	agencies on		agency	guide
	information		information to be					identifying and		business areas	Information
	that support		comprehensive, inclusive,					implementing		and information	Needs
	adaptation		credible, and responsive and					opportunities to		needs;	Assessment
	planning and		adaptive to changes. Supports					share data,		Conducting a	
	other business		adaptation and mitigation					standards, tools		collaborative	
	needs		policies, such as the					and products		process;	
			President's Climate Action							Adjusting the	
			Plan and the National Fish,							way the agency	
			Wildlife, & Plants Climate							has managed	
			Adaptation Strategy.							resource	
										information	
										over time –	
										culture;	
Develop and implement	Provide	Sustainable	Opportunity to characterize	National,	Ongoing	Development of	WCF and TCC	Sharing of	Better		
Watershed and Terrestrial	information	Landscape	and prioritize watersheds and	Regional,		indicators, tools,	become an	science, data,	coordinated		
Condition Frameworks	that supports	Management	landscapes for developing	Local	FY2016	and guidance for	integrated	tools applicable to	land		
	integrated	Board of	restoration and adaptation			assessments.	dataset,	vulnerability	management		
	resource	Directors	strategies. Continue effort to				assessment, and	assessments,	across		
	restoration and		merge these into a				monitoring tool.	priority setting,	jurisdictions.		
	CC adaptation		comprehensive assessment					etc			
			tool and indicator set.								
			Watershed Condition								
			Framework is operational.								
			TCF component is being								
			developed.								

Improve the Climate Change Resource Center (www.fs.fed.us/ccrc)	Provide access to information and training that supports CC adaptation	Development	Opportunity to enhance this web-based science-delivery portal for Forest Service employees and partners who need information and tools to address climate change in project planning and implementation.	National	2012-2015	Website development and improvement	Annual monitoring of website improvements completed.	Share science, data, tools, educational materials		
Improve Interagency Coordination on Climate Projections		Climate Change Advisor's Office, Research & Development	Opportunity to coordinate and provide guidance within Forest Service on the selection & use of downscaled climate projections and expand across land management agencies and climate science providers. The goal of this larger effort is to simplify the complex array of choices in a rigorous, defensible manner and facilitate greater comparability in data use	nested to apply at multiple levels	On-going. Work plan defined June 2013, draft products expected by end of year.	Coordinating with other agencies	Published # of agencies on- board  Publication of guidance  Adoption/use of guidance  Outreach activities to promote awareness	This one of several projects sponsored by the Interagency Landscape Management Adaptation Group (ILMAG).  Interagency work group formed. Sharing science and coordinating further work.		Climate Projections FAQs publication completed and distributed.
Conserve Genetic Diversity	Improve the success of adaptation projects.	Forest Management, Rangeland Management	Risk reduction - Genetic differences found in forest and rangeland plant species would be mapped to the landscape using GIS and other spatial analyses. From these genetic landscape maps, develop seed movement guidelines for species of restoration and reforestation concern by predicting their ability to be adapted to future climates.		On-going	Research, publication of guidelines.	Number of species genetically analyzed	No inter government coordination exists. However, inter-agency coordination exist between FS, ARS, NRCS, and BLM	Lack of funding and loss of trained geneticists.	Studies have been completed or are underway for 15 grass species, 9 forbs, and 7 trees and shrubs

Improve Forest Tree Gene	Supports	Forest Health	Risk reduction - Prioritize	National	Ongoing	Research,	Ensure at least			
Conservation	1	Protection	forest trees for gene			planning,	20 unrelated			
	forests to CC		conservation, develop		FY2012-2015	implementation	individuals (or			
			conservation plans, carry them	l.			seed) collected			
			out				per seed zone.			
Implement National Insect			Identifies areas at risk to	National,		Risk map and	Updated map is	Covers all treed	Future plans	National Insect
and Disease Risk	ecosystems to	Protection	catastrophic levels of forest	Regional,	2013	supporting data	issued	lands in US.	include	and Disease Risk
Assessment	increase		insects, pathogens and abiotic	and Local		and information		Assessment	enhanced	Map was just
	resilience		mortality agents. Projects			are posted on		completed	climate	updated.
			anticipated levels of tree			Forest Health		through Forest	projections	
			mortality over the next 15			Monitoring		Health		
			year period.			website.		Monitoring		
						information for		Program – a		
						strategic and		federal and state		
ļ				<u> </u>	<u> </u>	tactical planning		partnership		
Create climate-sensitive	Improve	Forest	Provides opportunity to model		2014 - 2015	C		An inter-agency	Because	A climate
		Management	effects of climate change and	model			completion of	steering team	climate change	sensitive version
C	simulate		develop management	applied at			the model and	with members	•	of FVS has been
	effects of			Regional			_	from the BIA,		implemented for
supported forest	climate		result in a resilient ecosystem					BLM, and NRCS	unlike anything	
dynamics model.	change on		when planning for restoration,	levels				helps direct work	,	conterminous
	forested lands		watershed improvement, and					of the FVS staff,	for validation	United
			other activities. Reduces risk					including		States. Develop
			of planning activities likely to					development of	are lacking and	
			have an adverse effect on					the climate		eastern version
			ecosystem resilience as the					model.		is well
			climate changes.						available.	underway.

R&D All Station Climate	Learn from	R&D		National,	On-going	Plan and	# of	Collaborative	Highlights	Work with over 80
Change and Tribes	and Assist	(Northern		Regional		facilitate	Tribes/Native	Work with many	needs for	Tribes and 20
Project	Tribes and	Station				workshops,	orgs engaged	DOI LCCs and	funding for	intertribal/native
	other native	currently				support		CSCs.	monitoring	organizations. Active
	peoples in	serving as				Regional			culturally	science-manager
	managing our	project				Scientist-			important	networks established in
	nations'	coordinator)				Manager			1	PNW and SW. Over
	natural					networks,				60 tribal
	resources in					develop				experts/students
	the context of					"portfolio"				supported to attend
	changing					studies				climate-related
	climate					highlighting				conferences/workshops.
						particular local				Dozens of publications
						challenges and				and guides for Tribes.
						adaptation				
						options.				
Synthesize climate	Coordinate		Opportunity to improve		2014	Research,	Publication			
change adaptation across	adaptation		coordination by	Regional,		review existing				
all federal land	among		documenting past and	Local		programs and				
management agencies	agencies		ongoing climate change			efforts				
		Research &	adaptation efforts of all							
		-	federal land management							
			agencies, developing							
			overarching inferences							
			regarding adaptation, and							
			emphasizing the consistency							
			among agencies.							