



December 29, 2006

Ms. Claire Harper
USDA Forest Service
Cooperative Forestry
Mail Stop Code 1123
1400 Independence Ave, SW
Washington, DC 20250-1123

Dear Ms. Harper;

The Society of American Foresters, representing over 15,000 forest managers, researchers, and consultants in all sectors of the profession, strongly supports the conservation of forested open space. In response to the request for comments in the November 13, 2006 *Federal Register* notice on the development of a USDA Forest Service Open Space Conservation Strategy and Implementation Plan, we offer the following perspectives.

As the Agency develops a strategy outlining its unique role in the conservation of open space, we urge the Forest Service to focus on the conservation and management of *forested* landscapes, maintaining consistency with the agency's mission. Additionally, while it's important the Forest Service assess its unique role, the Agency must take into account other efforts by other agencies and partners when developing a strategy for open space conservation.

For a forested open space strategy to truly be effective, it must contain components that address the ecological, the social, and the economic aspects of forest management, and recognize the interdependent nature of these three components. In other words, it must contribute to sustainable forests on the landscape. For example, any strategy that simply focuses on maintaining or conserving ecological values but fails to sufficiently address economic issues, will ultimately fail. Conversely, a strategy that only provides for economic support and ignores the ecological issues, will also fail. Many of the nation's forest policies relating to forest conservation and management do not reflect these principles, placing more emphasis on one aspect or completely ignoring aspects.

We are seeing the results of these broken policies manifested in a number of current forest crisis, including in the loss of forested open space on private forests; the divestiture of industry lands; the loss of around 1 million forested acres per year to development; fragmentation of forested landscapes reaching an all time high; and the immense growth at the wildland-urban interface which creates challenges for the management of both public and private forests.

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While the current programs within State and Private Forestry in the USDA Forest Service are well valid programs, they can only an impact on a fairly small scale, when compared to the extent of the problems we face. Additionally, these programs can only reach a small segment of the forest ownership base. For example, the Forest Stewardship Program reaches only a small portion of the total small family forestland owner base with its limited resources. The Forest Legacy Program is a well designed, strategic program, but there will never be enough resources to purchase all the land as a means to “conserve” open space. Other programs administered outside the Agency, such as the Environmental Quality Incentives Program also assist in managing and conserving forested open space although again, only affect a small portion of the landscape. This is not to say these programs are unimportant, but unfortunately, they can only have a limited impact on the truly astronomical problem we are facing as a nation.

To truly affect change on the forested landscape, SAF believes the following are essential in any open space conservation strategy focused on the forestland base. These elements are a combination of policy, program, research, and partnership tools to address open space conservation:

- **Prioritization:** given we are facing an enormous problem and the federal government has finite resources, prioritization and better focus of federal resources are essential.
- **Landscape and Multiple Ownership Approaches:** all too often, programs and policies only address one ownership, ignoring the fact that forested landscapes are typically a patchwork of ownerships. Programs must provide for coordination across multiple ownerships on a landscape, including both public and private ownerships.
- **Local solutions:** given that the policies and issues affecting the forestland base are typically local, it is essential the any federal program recognize this and work within the local context, helping foster sound forest management decisions at the local level.
- **Management for Open Space:** a federal open space conservation strategy must recognize that to truly conserve the forested land base, we cannot simply put “fences” around these forests and leave them alone. While some forests are appropriate to be left alone, others need management. To truly conserve forest lands, we must maintain the ability to manage them to meet the needs of society. If forests no longer meet the public’s needs, they become irrelevant and their conservation, impossible.
- **Coordination with other efforts:** the Agency must recognize that they have limited authority and resources to truly address the issues and must rely on partnerships and coordination with other agencies and partners at the federal, state, and local level. The more efforts to conserve open space can be coordinated, the better resources can be used and leveraged to accomplish results.
- **Incentivizing Action:** experience has demonstrated that incentivizing action is an effective way to influence positive change. Federal programs should focus on incentives for open space conservation, rather than regulatory approaches.
- **Private landowner and community outreach, education, and technical assistance:** given that the bulk of US forests are owned by small family owners who traditionally lack the resources and expertise to manage their forests, an open space conservation strategy must engage and educate the landowning community and offer them sound advice and assistance to inform their decision making. This can be done through both existing and new innovative programs and efforts.

- **Forest Inventory and Analysis:** the federal government is uniquely positioned as the provider of a nationally, consistent system of forest inventory and analysis. It is essential that the federal government continue to fulfill this role. The FIA program offers the only nationally consistent means to measure progress or challenges in the conservation of forested open space.
- **Maintenance and Development of Markets for Forest Resources:** as the US forest products industry continues to move overseas, it becomes increasingly difficult to cover the costs of maintaining and managing forested landscapes and the open space values they provide. Any strategy to conserve open space should look at ways to generate economic value for that open space, whether in the harvesting of forest products, the sequestering of carbon, offering recreational access, or other opportunities.

In response to the questions raised in the *Federal Register* notice, we offer the following.

1) How can the Forest Service protect land from conversion to other uses?

It is important that the Forest Service have a number of tools to assist landowners and communities in making sound decisions about their land. It is not a realistic goal for the Forest Service to set aside and “protect” all forested lands from conversion. Instead the Agency must assist landowners and communities in making well-informed decisions about the forested landscape, meaning some lands will ultimately be developed but if done strategically, the impacts on the forests and the associated values can be minimized.

A number of current Forest Service tools assist in this endeavor, most notably the Forest Legacy and Forest Stewardship Programs. There are also a number of tools within other agencies, such as the Natural Resources Conservation Service, the Cooperative State Research Education and Extension Service, and the Farm Services Agency, that assist in protecting forestland from conversion. It is important that these programs remain, work in a more coordinated and focused manner, and that they have sufficient resources. New programs may also be necessary in the form of community technical assistance, green payments, emergency forestry assistance, and other ideas.

Another means besides direct landowner and community assistance is market maintenance and development. With markets and industry infrastructure in place, owning and managing forestland becomes much more economically viable, forest health and biodiversity issues can be better addressed and other social and ecological values can be better provided for. The Forest Service currently plays a strong role in addressing these issues through the Forest Products Laboratory. However, the agency could play a stronger role, in coordination with other efforts occurring within USDA’s rural development arm, the Department of Energy, the Department of the Interior, and others.

Tax policy is another way to stem the conversion of forestlands to non forest uses. While the Agency does not have the authority or oversight over tax policy, they certainly can play a role in informing policy decisions at the national, state, and local levels to ensure incentives for forest conservation and management are present and disincentives are eliminated.

In addition to the work that can be done to help private forest owners, it is essential that policymakers recognize the role of publicly owned forests in conserving open space. The federal forests in particular play tremendous role in conserving open space. Unfortunately, these lands are facing major pressures both from a forest health perspective and from decreasing management budgets. If these lands are not managed sustainably, recognizing they can contribute to the ecological, economic, and social fabric of the nation, their very existence may also be threatened as federal resources become scarcer and the surrounding forested communities become even more frustrated with the problems these forests create.

To address these challenges and truly conserve open space, we must recognize that strategies need to involve multiple ownerships on a landscape, not just a single ownership. Additionally, it would be worthwhile for the Forest Service to test new authorities for both public and private ownerships and ways to incorporate a landscape/multi-ownership approach and address some of the management challenges that are threatening forest sustainability on the landscape.

2) How can the Forest Service assist private landowners and communities in maintaining and managing their land as sustainable forests and grasslands?

As mentioned above, it is important that the Forest Service have a number of tools to assist landowners and communities in sustainable forest management. These tools should reflect the three components of sustainability: the ecological, economic, and social values and issues that affect the sustainability of forests.

Ultimately, sustainable forests should be the goal the Forest Service and other agencies strive towards. This goal would involve the conservation of open space as well as ensuring a number of the other values that forests provide.

3) How can the Forest Service mitigate the impacts of existing and new developments?

While the Forest Service can assist in helping communities and landowners make informed decisions about forested lands, the Agency has little authority over such decisions. The Agency can assist communities in planning for open space as they are considering development and the Agency can also better manage their own lands to ensure open space is adequately provided on those lands.

In conclusion, there are a number of roles the Forest Service can play in conserving open space, but at the same time, there are also limitations to the agencies authorities and resources. The more the Agency can form partnerships and cooperate with ongoing efforts, the better the results on the ground will be. Ultimately, efforts to conserve open space must recognize and complement the principles of forest sustainability to truly be effective.

Thank you for the opportunity to comment.

Sincerely,



Michael T. Goergen Jr.
Executive Vice-President, CEO