



**File Code:**

**Date:** March 25, 2001

Secretary Ann Veneman  
U.S. Department of Agriculture  
14<sup>th</sup> & Independence  
Washington, DC

Dear Secretary Veneman:

As you know, this is my final week as Chief of the United States Forest Service. I grew up on the Chequamegon National Forest along forest road 164. As a young boy, I made many trips up and down the West Fork lookout tower that was in full view from our kitchen window. As perhaps the only Chief to have actually grown up on a National Forest, it has been a distinct honor to serve with 35,000 employees dedicated to caring for the land and serving people.

One hundred years ago, one of your predecessors, Secretary James Wilson, directed the Forest Service to manage public resources for “the greatest good of the greatest number in the long run.” What defines the “greatest good” has changed significantly since 1904, even since 1997 when I accepted this job. Our modern industrialized society of 275 million people recognizes today that the values of open space, clean drinking water, and recreation far outstrip more traditional commodity values.

Although the mix and intensity of uses have changed significantly over the years, the multiple use mission of the Forest Service remains as important today as ever. Consider our many multiple use accomplishments of the past year. We:

- Provided drinking water to approximately 60 million Americans;
- Managed about 35 million acres of wilderness;
- Performed watershed improvements on 35,500 acres;
- Restored 470,500 acres of wildlife and fish habitat
- Permitted 9.3 million animal head months of livestock;
- Maintained 23,000 developed recreation sites and 4,300 campsites;
- Assisted 146,700 woodland owners and 690 rural communities;
- Reduced hazardous fuels on 1.4 million acres;
- Developed 2,500 research reports and other technical documents;
- Maintained 4.5 billion board feet of timber under contract; and
- Processed 1075 energy and bonded non-energy operations.



Early in my tenure, we faced congressional threats of “custodial funding” due to a decline in the production of commodities. Four years later after an incredibly challenging fire season and an unprecedented debate on the value of clean water and unfragmented landscapes, the overall Forest Service budget increased by 65 percent. National Forest System funding increased by 22 percent. State and Private Forestry increased by 159 percent and Research by 28 percent. I hope that you are able to continue these sorts of investments in conservation and knowledge that pay such high dividends to future generations.

As you begin your tenure as Secretary of Agriculture, I would like to share with you recommendations to help resolve specific longstanding conservation challenges as the Forest Service enters a new century of managing for “the greatest good of the greatest number in the long run.”

### **Roadless Area Protection**

I hope the Administration’s intent is not to negotiate a settlement with those opposed to roadless area protection. Doing so would undermine the most extensive multi-year environmental analysis in history; a process that included over 600 public meetings and generated 1.6 million comments – the overwhelming majority of which supported protecting roadless areas. Controversy over roadless areas has persisted for decades. I hope you will withstand political pressure and not reopen this divisive debate.

Due to complexity, cost, and controversy more projects fail in roadless areas than anywhere else. Most important, not a single private land owner or corporate interest would continue to build new roads in pristine areas while saddled with a crumbling 386,000 mile road system with an \$8.4 billion road maintenance backlog liability. One quarter of one percent of our nation’s timber and a fraction of a fraction of our oil and gas is a small price to pay for the protection of 58.5 million acres of our children’s natural resource inheritance. The long-term public interest in conserving these areas should prevail over short-term private interests.

### **Civil Rights and Financial Management**

Much progress has been made in the areas of civil rights and financial management and accountability, but more remains to be done. The Forest Service must remain vigilant in promoting a civil rights agenda that treats employees and customers fairly and with decency and respect.

Financial management and accountability remain a significant vulnerability. Although the traditional culture of the agency does not readily accept outside assistance, I recommend your bringing in the highest quality expertise to bolster Forest Service skills and accelerate the achievement of financial and program accountability goals. With a \$4 billion budget and 35,000 employees, the Forest Service is akin to a Fortune 500 company in size and complexity. It deserves comparable leadership and expertise in the arena of financial management.

## **Old Growth**

More than any other, the old growth issue symbolizes the conflict and controversy that crippled the Forest Service for 30 years or more. Former Chief Dale Robertson called for the inventory and mapping of old growth forests more than a decade ago. It is time we completed those inventories and maps.

Moreover, it makes little sense to harvest old growth forests simply to bring their short-term economic values to market. The greatest good of these remnant forests is found through their research and study, conservation and restoration. The mark of a truly wealthy nation is not measured in acres harvested, rivers dammed, oil barrels filled, or mountaintops mined. Our maturity is most ably displayed by demonstrating mastery over ourselves. Our willingness to say, "Enough, these ancient forests cannot be improved through commodity timber production" honors our nation far more than engineering an expensive road to harvest an old growth stand.

Timber harvest remains an important function of the National Forest System. For example, thinning of brush and small diameter trees may help protect communities and restore fire dependent ecosystems, and in the process employ thousands of people in high quality jobs. But not if timber harvest comes at the expense of our rarest and most biologically significant old growth forests. Ensuring the conservation of old growth forests should become among the highest Forest Service priorities.

## **Timber Trust Funds**

The incentive system that drives many Forest Service activities, despite the best intentions of field employees, continues to be modeled on an outdated system from a bygone era. The Forest Service helped to prompt congressional reform of a 1908 law that separates funding for rural schools and roads from timber harvest levels. If implemented as passed, this legislation can help to diminish controversy and reconnect communities to the lands and waters that sustain them.

Congress should now turn its attention to reforming the financial incentive system that promotes roadless area development and old growth harvest. The fact that timber receipts are used to pay employees and finance important programs too often pits long-term land health objectives against short-term financial considerations.

For the past two years ago, the Forest Service proposed that Congress make nearly \$400 million of Forest Service timber related trust funds (e.g., Knutson-Vandenberg, Salvage, and Brush Disposal funds) subject to public scrutiny and congressional review through the annual appropriations process. Given the increases in our budgets over the past few years, it is past time that all Forest Service programs are treated on an equal par.

## **Wilderness**

Few congressional decisions are more forward-looking than those involving wilderness designation. We must highlight the profile of, and increase the funding for, the dwindling number of wilderness employees in the field. This helps to explain why I committed to hiring a hundred new wilderness field staff and created a separate wilderness program apart from Recreation, where Wilderness formerly resided. It is far more than a recreation resource. Wilderness is a salve to the human spirit. In an increasingly developed and urbanized society it is a tangible reminder of our pioneer heritage.

As an agency, we have always had a schizophrenic relationship with wilderness. Although the Forest Service practically invented the wilderness ethic, we struggle with recommending new wilderness designations from the most biologically productive lands. Existing wilderness areas remain under threat today – from proposed mining operations under the Cabinet Mountains Wilderness of Montana to chronic under-funding. Remaining vigilant against these threats and recommending the expansion of wilderness from remote high elevation areas to old growth forests, prairie grasslands, and bottomland hardwoods would demonstrate your commitment to this enduring resource.

## **Fire Management**

Six years ago, in the wake of a deadly fire season, Congress passed, and the President signed, the Salvage Rider. The Salvage Rider applied short-term solutions to the long-term degradation of forest ecosystem health through past management actions and fire suppression. I became Chief on the heels of this 18-month law that suspended citizen appeals and directed agency resources into timber harvest of burned and associated green trees, and inherited the rancor and gridlock it wrought.

By contrast, in the aftermath of last summer's similarly intense fire season, we crafted a bipartisan approach to protecting communities and restoring fire dependent ecosystems not dependent on the use of traditional commercial timber sales. Our long-term solution directs protective work on the areas directly adjacent to communities most at risk, through thinning of brush and other fine fuels that are most flammable, and broader use of prescribed fire. Thousands of jobs and economic opportunities await those communities willing to perform the needed stewardship work and to use the wood fiber generated incidental to accomplishing restoration objectives. The effort will meet controversy and gridlock, however, if used to simply accelerate commercial timber harvest in the name of fire protection.

## **The 1872 Mining Law**

The General Mining Act of 1872 is the product of an era when women and many minorities could not vote, the nation was struggling through Civil War reconstruction, and St. Louis represented the western frontier to many citizens. The 1872 Mining Law confounds Forest Service efforts to balance multiple uses. Problems with the Law's antiquated royalty provisions are well known. In addition, the Law allows privatization of public lands for as little as \$2.50 to \$5 per acre. Every single use of the National Forest System: recreation, timber harvest, oil and

gas development, for example, is subject to the approval or rejection of a field official for environmental or safety reasons. All but one, that is – hard rock mining.

It is Congress, not the Forest Service that must act to bring this law into a modern context. Because they have not, I recommended the segregation and withdrawal from development under the 1872 Mining Law of the Rocky Mountain Front, the Guadalupe Caves in New Mexico, portions of the biologically rich Siskiyou National Forest of Oregon, and other areas of the National Forest System. I had little choice in the matter because the anachronistic law vests anyone capable of filing a valid claim with the right to develop an area regardless of its other social or environmental values. Until Congress demonstrates the willingness to reform the outdated 1872 Mining Law, I urge you to continue to aggressively recommend the segregation and withdrawal of our most sensitive forests and grasslands from hard rock mining.

### **Off Highway Vehicles**

More people recreate on National Forests and Grasslands than on any other public lands. Technological innovations in motorized recreation enable people to get into more remote areas than ever before, often resulting in degraded water quality and wildlife habitat and erosion. Off highway vehicles should remain a legitimate use of public lands where expressly allowed. We must ensure, however, that their use does not compromise the integrity of the soil and water resource and wildlife habitats.

Last year, more than 100 groups petitioned me to initiate a national rulemaking regarding off highway vehicles. I resisted in part due to other priorities. This issue, however, will not get any easier for local managers. I urge to you to ratify and implement policies that I articulated last year for the use of off road vehicles on the National Forest System. They include:

- All off road vehicle decisions, including those that change present levels of use, should be made through an open and public process, except where emergency closure is needed to protect public safety or forest resources.
- Motorized use should occur only on designated routes and areas. Development and use of unauthorized roads and trails should be illegal. This will require adequate signing and mapping for responsible off road vehicle users.

If such recommendations are not implemented, the litigation and controversy that greatly reduced the timber program, will almost certainly soon haunt the Recreation Program.

### **Private Land Conservation**

Fewer areas offer more promise for conservation and watershed restoration than private lands. Decisions by the nation's largest wood retailers to not purchase wood from endangered forests and to only sell appropriately certified wood products speak to the promise and momentum of this issue. The Forest Service State and Private and Research programs offer urban and rural residents alike voluntary options for improving management, conservation, and restoration of private lands. These programs are chronically under-funded yet entirely consistent with this

Administration's stated intent to offer incentives to private land conservation, and should be a priority for the Department of Agriculture.

## **Water**

Recent international studies indicate that by 2025, two-thirds of the world's people will face water shortages. As Chief, it was my policy that watershed health and restoration serve as the overriding priority of all forest plan revisions. Fewer States demonstrate the importance of the National Forest System to drinking water than your home state, California. Although National Forests comprise only 20 percent of the State's land base, they supply nearly 50 percent of the surface runoff. Ensuring the multiple benefits of the National Forests water resource will require, among other things, a willingness to assert water rights to preserve wilderness values, providing minimum instream flows for fish, and securing bypass flows for other resources.

I recognize that short-term political imperatives run rampant in Washington, DC. Please remember that the decisions you make through your tenure will have implications that last many generations. You cannot fail if you allow your loyalty to the land and to those yet to be born to take precedence over all other organizational and political fealties.

I wish you much success as Secretary of Agriculture, and hope that you receive these recommendations in the constructive manner they are intended. With clear conservation policy direction, and without micromanagement from political forces, the Forest Service is the world's finest conservation organization. Allow Forest Service employees to follow their land ethic and they will provide for "the greatest good of the greatest number in the long run."

Sincerely,

Michael P. Dombeck  
Chief of the Forest Service